

# **Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge**

**Consultation with key stakeholders - comments received and responses to these**

**November 2023**

Respondent	Comments received	Response
Heart of SW LEP	<p>Thank you for the opportunity to comment on “Our Shared Co-ordinates”, a joint strategy for East Devon, Exeter, Mid Devon and Teignbridge. We welcome the initiative of producing a joint strategy covering the area of four districts, centred on the city of Exeter. Working through the draft document in turn we offer a number of comments below, which we hope will be helpful.</p> <p><u>An exceptional place</u></p> <p>Without wanting to detract from the strategic nature of the document we wonder whether it might be helpful on this introductory page to include the current population and employee numbers on this page.</p>	<p>Comment noted.</p> <p>The last sentence on page 2 last has been amended to read "Such is the attractiveness of the area that the resident population (approx. 500k people) is forecast to increase by 8.5% ....."</p> <p>and the first sentence on page 12 has been amended to read "Our area is experiencing fast employment growth, current predictions are for around 35,000 new jobs between now and 2040. This is driven largely by the emergence of more knowledge-based sectors...."</p>

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	<p><u>Context map</u></p> <p>There is no key to this map, and there are some inaccuracies/ inconsistencies with later maps. For example, Tiverton Parkway station is shown in the wrong location; the railway line to Okehampton is not shown at all; the A35 trunk road is not shown.</p> <p><u>Our Vision</u></p> <p>We endorse the vision statement. The map on page 6 again omits the Okehampton railway line, and some of the railway stations.</p> <p><u>Net Zero</u></p> <p>Page 10 highlights initiatives such as standards for new housing, hybrid electric aviation, etc. It should be pointed out that the greater contribution in moving towards net zero is likely to come from retro-fitting existing housing (insulation, heat pumps) and from facilitating the transition to electric vehicles, given that</p>	<p>Comment noted.</p> <p>The diagram on page 2 is for illustrative purposes only, designed to show the key strategic assets of the district. Further detail is provided with an accompanying key on the map on page 6.</p> <p>The map has been amended to show Tiverton Parkway in the correct location, the railway line to Okehampton and the A35 Trunk Road</p> <p>The map on page 6 has been amended to include the Okehampton railway line and stations</p> <p>Comments noted. The ambitions on Page 9 reflect the targets we have collectively signed up to in the Devon Carbon Plan. The ambitions are focused on what the planning system can actively influence. As such, notwithstanding that retrofit is an important aspect of addressing energy security, it is not a strategic planning issue associated with this strategy.</p>

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	<p>domestic heating and land transport currently constitute a significant proportion of total carbon emissions.</p> <p><u>Jobs and Prosperity</u></p> <p>Mention might also be made of the need to improve productivity, generally, but particularly in sectors such as agriculture and tourism.</p> <p>Also, there should be an acknowledgement of the importance of health and social care within the economy of the area, and the likely growth in demand given the age demographic mentioned elsewhere in the document.</p> <p>The map on page 14 shows a “Major tourism opportunity” with no other narrative. This merits some explanation.</p>	<p>These are agreed as key issues but it is considered that reference to agriculture and tourism is sufficiently covered on Page 12. The first bullet on page 16 has been amended to read: ‘Encouraging SME developers to supply a larger proportion of homes within the area and promoting employment and skills plans’.</p> <p>Page 12 has been amended to include the following text: ‘This requires a skills and education infrastructure that is fully aware of, and responsive to, the needs of growth sectors, particularly in the delivery of science, technology, engineering, maths and medicine (STEMM) subjects, whilst also supporting health, social care, farming and tourism’.</p> <p>Comment noted. The notation relates to the Mid Devon Local Plan proposal for a major tourism, leisure, and retail development at Junction 27 on the M5 motorway. It is not considered necessary to repeat the detail of local plan proposals in the Joint Strategy,</p>

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	<p><u>Homes</u></p> <p>It is not clear whether the development ‘circles’ on the map on page 18 reflect the total size of those development areas, including housing already delivered, or the numbers of dwellings which will in future be delivered at those locations.</p> <p><u>Nature</u></p> <p>The map on page 24 includes areas within South Hams and Torbay as part of “The Area”. This deserves some explanation.</p> <p>The blue colour of the Jurassic Coast is not evident on the plan.</p> <p><u>Connectivity</u></p> <p>The text on page 27 states Marsh Barton station will open – it actually opened in July 2023. The map on page 28 appears to have a number of inaccuracies. For example, the first section of the A361 North Devon Link Road is incorrectly shown; the A35 trunk road from Honiton to Axminster and beyond is not shown.</p>	<p>The notation used sets an arbitrary threshold of 3,000 homes and is indicative of the scale of development (recently completed, committed and proposed in locations) across the area.</p> <p>The map is clear in defining the area to which the Joint Strategy applies by means of a red line. It is appropriate to show notation beyond the Joint Strategy area which can help provide context to discussions with stakeholders in neighbouring areas, which supports the purpose of the Joint Strategy.</p> <p>The plan on page 24 has been amended to show the Jurassic Coast more clearly.</p> <p>The text has been updated to indicate the Marsh Barton station opened in July 2023.</p>

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Active Travel England	<p>Thank you for your email.</p> <p>Active Travel England does not currently have a strategic Pre-Planning offer, and so we cannot comment or consult on your Joint Strategy.</p> <p>In the meantime, what I can suggest is that when you come to thinking about individual sites, we would want to encourage / embed use of the Planning Assessment toolkit to assess proposals – and so we are offering the the tools and guidance to enable planners, transport officers and developers to assess their proposals against the latest best practice and policy requirements.</p> <p>The planning application assessment toolkit helps local planning authorities to gather evidence and assess the active travel merits – walking, wheeling and cycling – of a development proposal.</p> <p>These tools have been developed over the last year or so bringing together the expertise and expertise of planning professionals working in our development management team, but also planning authorities, highway authorities, transport consultants and internally, within ATE, the DfT and DLUHC.</p>	<p>Comment noted that Active Travel England cannot comment on the Joint Strategy.</p> <p>The links provided to Active Travel England’s Planning Assessment toolkit are noted. However, these are not needed for this consultation since the Joint Strategy is not a development plan and does not allocate development sites.</p>

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	<p>Whilst the planning assessment is integral to our standing advice offer this is also the tool that ATE will be using to assess Planning Application proposals.</p> <p>ATE's Development Management will be attaching our toolkit summary report to our formal responses where we recommend standing advice.</p> <p>ATE also considers it would be hugely beneficial if developers were to include these assessments in their pre-application and planning application submissions.</p> <p><b>ATE Planning Application Assessment Toolkit (PAAT): Checklist User Manual <a href="#">Active Travel England: planning application assessment toolkit - GOV.UK (www.gov.uk)</a></b></p> <p>The planning application assessment toolkit helps to gather evidence and assess the active travel merits – walking, wheeling and cycling – of a development proposal. It should be used by local authority planning and transport officers in conjunction with the applicant.</p> <p>When making a planning application assessment, you should also refer to:</p> <ul style="list-style-type: none"> <li>• <a href="#">Active Travel England: development management</a></li> </ul>	

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	<ul style="list-style-type: none"> <li>• <a href="#">Active Travel England: sustainable development advice notes</a></li> </ul> <p>A checklist user manual and a tutorial video have been produced to help you understand how to complete the assessment.</p> <p><b>Development Management Procedural Note for Local Planning Authorities <a href="#">Development Management Procedural Note for Local Planning Authorities (publishing.service.gov.uk)</a></b></p> <p>This procedural note for local planning authorities sets out how Active Travel England (ATE) will approach planning casework.</p> <p>It is designed to provide context to our remit and support the formal comments that the ATE team may make as a part of the statutory consultee process.</p> <p>When making a planning application assessment, you should also refer to:</p> <ul style="list-style-type: none"> <li>• <a href="#">Active Travel England: planning application assessment toolkit</a></li> <li>• <a href="#">Active Travel England: sustainable development advice notes</a></li> </ul> <p><b>Active Travel England Standing Advice Note: Active travel and sustainable development <a href="#">Active Travel</a></b></p>	

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	<p data-bbox="450 236 1189 344"><a href="#">England Standing Advice Note: Active travel and sustainable development (publishing.service.gov.uk)</a></p> <p data-bbox="450 384 1232 488">Two advice notes have been produced to reflect the different considerations that apply within and outside of London.</p> <p data-bbox="450 531 1249 711">These standing advice notes provide guidance for local planning authorities on how planning applications should be considered when Active Travel England (ATE) will not undertake a detailed assessment of development proposals.</p> <p data-bbox="450 754 1211 820">When making a planning application assessment, you should also refer to:</p> <ul data-bbox="499 866 1155 1010" style="list-style-type: none"> <li>• <a href="#">Active Travel England: planning application assessment toolkit</a></li> <li>• <a href="#">Active Travel England: development management</a></li> </ul> <p data-bbox="450 1050 1128 1121"><b>Manual for Streets: <a href="#">Designing and modifying residential streets - GOV.UK (www.gov.uk)</a></b></p> <p data-bbox="450 1161 1043 1195">This manual provides guidance about the:</p> <ul data-bbox="499 1238 719 1342" style="list-style-type: none"> <li>• design</li> <li>• construction</li> <li>• adoption</li> </ul>	

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	<ul style="list-style-type: none"> <li>• maintenance</li> </ul> <p>of new residential streets. Information inside it can also be applied when redesigning existing residential streets.</p> <p>The ‘Manual for streets’ has won a Royal Town Planning Institute prize. The award recognises that the document is radically changing designers’ and local authorities’ approach to residential street design for the better.</p> <p><b><u><a href="https://www.gov.uk/government/publications/local-transport-note-120-cycle-infrastructure-design">LTN1/20: Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk)</a></u></b></p> <p>This local transport note (LTN) provides guidance to local authorities on delivering high quality, cycle infrastructure including:</p> <ul style="list-style-type: none"> <li>• planning for cycling</li> <li>• space for cycling within highways</li> <li>• transitions between carriageways, cycle lanes and cycle tracks</li> <li>• junctions and crossings</li> <li>• cycle parking and other equipment</li> <li>• planning and designing for commercial cycling</li> <li>• traffic signs and road markings</li> <li>• construction and maintenance</li> </ul>	

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	<p><b>Inclusive Mobility</b> - <a href="http://www.gov.uk">Inclusive mobility: making transport accessible for passengers and pedestrians - GOV.UK (www.gov.uk)</a></p> <p>This document gives the latest guidance on designing and improving the accessibility and inclusivity of public transport and pedestrian infrastructure.</p> <p>This guidance was informed by <a href="#">research that the Department for Transport (DfT) published in February 2020</a>.</p> <p>The purpose is to provide good access for disabled people and meet the needs of many other people.</p> <p><b>Pedestrian Comfort</b></p> <p>ATE has no specific guidance relating to Pedestrian Comfort however I can signpost you to TfL's <a href="http://tfl.gov.uk">Pedestrian Comfort Guidance for London (tfl.gov.uk)</a></p> <p><b>Women and Girls' Safety</b></p> <p>Likewise, ATE has no published guidance relating to Women and Girls' Safety – the Council should look to apply their own guidance / policies developed in response to the government's <a href="http://www.gov.uk">Tackling violence against women and girls strategy - GOV.UK (www.gov.uk)</a> and Safer Streets initiatives</p>	

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	<p><b>Active Travel Local Authority Toolkit</b> <a href="https://www.gov.uk/government/toolkits/active-travel-local-authority-toolkit">Active travel: local authority toolkit - GOV.UK (www.gov.uk)</a></p> <p>Best Wishes</p>	
<p>Devon County Council – Transportation Planning</p>	<p>I have provided the below comments to the non-statutory consultation document on behalf of Devon County Council's Transport Planning Team.</p> <p>Overall the vision aligns with the vision and objectives of our developing Local Transport Plan update and is therefore supported. It is good that recognised the need to reduce travel as well as switching to more sustainable modes.</p> <ul style="list-style-type: none"> <li>• Page 27 mentions more park and ride / change facilities which was initially identified in the Exeter Transport Strategy and published pre-Covid. Following the pandemic there has been a very slow return to using the park and ride services in Exeter which has resulted in a reduced service. The development of new park and ride services will be subject to the speed of recovery of the existing sites and integrated with the management of parking provision in Exeter City Centre. The sites also serve as multimodal interchanges for other sustainable forms of travel such as cycling and will provide electric charging facilities. It is suggested this section is reworded</li> </ul>	<p>Comment noted. No change is needed to the Vision.</p> <p>The text in the third bullet of text on page 27 has been replaced with the following text:</p> <p>“Park and Ride/Change and mobility hub facilities....”</p>

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	<p>slightly to reflect this and focus on mobility hubs as opposed to park and rides.</p> <ul style="list-style-type: none"> <li>• Some of the pieces of work have progressed since the drafting of the report.</li> <li>• The LCWIPS for Exeter and Newton Abbot have been completed and are awaiting Cabinet approval before being published. (They did go to Cabinet last week but have been delayed following the plan for drivers document).</li> <li>•</li> <li>• The LCWIPS for the West of East Devon and Tiverton / Cullompton are under way and we are looking at going to public consultation shortly.</li> <li>•</li> <li>•</li> <li>• Marsh Barton station opened in July 2023.</li> <li>• Not sure what the planned station in Exeter is on page 28 as we are not actively looking at any more stations. Is this one that has already been delivered?</li> <li>•</li> <li>• The report mentions a strategic infrastructure proposals list in an Appendix but I have not seen this to be able to comment.</li> </ul>	<p>The text has been updated with the factual correction.</p> <p>The text has been updated with the factual correction.</p> <p>The text has been updated with the factual correction.</p> <p>The proposed new station shown on the map (page 28) of the Joint Strategy is 'Monkerton', which was identified in the Devon Metro programme. Exeter City Council has safeguarded land for this new station.</p> <p>An infrastructure delivery list is included on page 30 of the Joint Strategy.</p>

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Historic England	<p>Thank you for sharing this document with us, which outlines the joined-up strategy and policy approach that the Councils are taking and which is informed by the emerging Local Plans. We look forward to publication of the associated Local Plans and would be willing to engage and potentially collaborate on topics relevant to our statutory role.</p> <p>We offer the following limited comments on the joint strategy:</p> <p><b>Challenges on page 4</b></p> <p>We think that this would benefit from an additional heading highlighting that there is a need to accommodate new development, potentially at higher densities, in a way that is sensitive to the characteristics of the area that make it special. For example, the historic environment of Exeter and rural towns and villages. This would integrate well with the 'Quality Places' section of the report.</p> <p>We have published some useful research on <a href="#">Increasing Residential Density in Historic Environments</a> which could assist the Council's in developing their thinking in this area.</p>	<p>An additional 'challenge' has been added on page 4.</p> <p><b>"Landscape and heritage – accommodating growth within a high quality built and natural environment"</b></p> <p>Local plans can include policies in relation to the density of new development, which would not be appropriate for inclusion in the Joint Strategy.</p>

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	<p>We have also produced an advice note on <a href="#">Tall Buildings</a> which is a key resource to inform research and policies relating to e.g. tall buildings, views and skyline.</p> <p><b>Vision</b></p> <p>We would welcome greater recognition of the environment in the shared vision – in terms of the value of its natural, built and historic assets.</p> <p>Likewise mention of the historic environment in the spatial strategy that accompanies the vision would be positive.</p> <p><b>Net-zero</b></p> <p>It would be beneficial if this section could highlight the fact that a large proportion of our building stock is already in existence and that retrofit of existing buildings (including buildings of traditional/historic construction) will play an important role in achieving net zero. Reuse and conversion of existing buildings is also encouraged by NPPF paragraph 152. Historic England has a range of <a href="#">associated guidance</a> online and we will soon be publishing our draft Climate Change Advice Note.</p> <p><b>Quality places</b></p>	<p>The words “and heritage” have been added after the words “..celebrate the area’s beauty”</p> <p>No change needed as the spatial strategy includes reference to “exceptional environments”, which is sufficiently broad to include historic environment.</p> <p>The ambitions on Page 9 reflect the targets the partner Councils have collectively signed up to in the Devon Carbon Plan. The ambitions are focused on what the planning system can actively influence. As such, notwithstanding that retrofit is an important aspect of addressing energy security, it is not a strategic planning issue associated with this strategy.</p>

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	<p>We are supportive of inclusion of this theme which seeks to respect and enhance local character and the environment through new development.</p> <p>Our suggestions in relation to the challenges of the area, and our associated research on residential densities and guidance on tall buildings are also relevant here.</p> <p><b>Nature</b></p> <p>We welcome the reference in this section to protecting the landscape setting of the settlements of the area.</p> <p>Many thanks,</p>	<p>Comments noted.</p> <p>Local plans can include policies in relation to the density of new development and tall buildings, which would not be appropriate for inclusion in the Joint Strategy</p> <p>Comment noted.</p>
National Highways	<p><b>Our Shared Coordinates Consultation</b></p> <p>Thank you for consulting us on the September 2023 draft of 'Our Shared Coordinates – A joint strategy for East Devon, Exeter, Mid Devon and Teignbridge'.</p> <p>National Highways has been appointed by the Secretary of State under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is in this context our comments are made.</p> <p>With a coverage of East Devon, Mid Devon, Exeter and Teignbridge this non-statutory plan includes sections of</p>	

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	<p>the M5 motorway, A38, A30, A35 and A303 trunk roads, which form part of the SRN. These routes perform a key function in enabling strategic connectivity. They have priority both in terms of strategic through-traffic that is vital for the south-west peninsula, but also in terms of supporting economic performance and growth.</p> <p><b>Spatial Strategy</b></p> <p>The document proposes the authorities will focus large scale new development around strategic growth areas – including Exeter (and surrounds), Newton Abbot &amp; Kingsteignton, Cullompton, Tiverton and M5 Junction 27.</p> <p>As identified in the consultation document, Exeter has the 2nd largest travel to work area in the UK, with 37,000 daily commuters – with a dominant reliance on private car. Growth both within/near Exeter and in the market towns surrounding rely on SRN to enable access to employment opportunities the city offers. The emerging transport evidence that is being developed to support the Greater Exeter Local Plans indicates growth related increases of traffic demand will affect SRN performance around Exeter. It is necessary that the transport evidence quantifies these impacts, and where necessary, capacity enhancements are identified as part of the plan-making process<sup>1</sup>. <sup>1</sup> As set out in DfT policy, Circular 01/2022 This provides the best opportunity to consider the cumulative impacts of development and to</p>	<p>Comments noted. The Joint Strategy, and its Infrastructure Delivery List, have been informed through the content of existing and emerging Local Plans which have themselves been prepared using technical evidence in relation to traffic and road transport infrastructure, and in consultation with National Highways.</p> <p>Comment noted. The Infrastructure delivery list on page 30 has been amended to include an additional bullet:</p> <ul style="list-style-type: none"> <li>• Improvements to the Strategic Road Network</li> </ul>

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	<p>identify appropriate mechanisms for the delivery of strategic highway infrastructure. National Highways would expect the findings of this work to inform the 'Infrastructure Delivery List' of this document.</p> <p><b>Jobs and Prosperity</b></p> <p>National Highways recognises that prosperity depends on our roads, so aims to support growth and facilitate development based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety.</p> <p>In alignment with the proposed spatial strategy, a number of strategic employment sites are identified around Exeter, and then along the M5 at Junction 28 (Cullompton) and Junction 27 (near Tiverton). While access to the M5 may be attractive for new employment growth, if travel impacts from proposed growth cannot be mitigated, the reliability of the network could become a potential constraint, affecting both the prosperity of the new sites, but also importantly, the existing productivity of the whole area. As above, evidence needs to be developed to ensure the impact of proposed growth on the SRN is understood, and also where necessary, mitigation plans in place to ensure growth is sustainable.</p> <p><b>Homes</b></p>	<p>Comments noted. The Joint Strategy has been informed through the content of existing and emerging Local Plans which have themselves been prepared using technical evidence in relation to traffic and road transport infrastructure, and in consultation with National Highways.</p>

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	<p>See comments above regarding ‘Spatial Strategy’.</p> <p>It is notable that the Culm Garden Village section has no mention of the strategic intervention that is needed at M5 Junction 28 to enable the delivery of this scheme.</p> <p><b>Connectivity</b></p> <p>The consultation document focuses on providing digital networks to reduce the need to travel, and seeks to make walking, cycling, public transport and shared mobility the preferred choice for most journeys. These principles are in accordance with National Highways guiding planning policy document, DfT Circular 01/2022, which identifies in plan-making local authorities should facilitate high quality places and ensure that developments optimise the potential of sites to support local facilities and sustainable transport networks. This too forms a component of developing a ‘vision-led’ approach to transport planning which sets an outcome communities want to achieve and provides the transport solution to deliver those outcomes.</p> <p>We would like to stress however that whilst facilities and services can be provided locally for new development, along with sustainable transport offer, additional development will still create some demand for trips (particularly long-distance journeys) made by private car, potentially using the SRN. The principle purpose of the SRN, to enable safe, reliable, efficient, often long</p>	<p>The text on page 17 has been amended to include reference to the need for a strategic intervention at Junction 28 to support the delivery of the Culm Garden Village.</p>

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	<p>distance, journeys of both people and goods in England, needs to be maintained. It may be necessary to deliver highway investment to ensure the SRN can continue to function as needed for both the Greater Exeter authorities, but also the wider peninsula, if growth is identified as having an impact on safety and performance</p> <p>The 'Connectivity Plan' includes a 'proposed improvement to road junction' marker on the M5 north of Junction 27. We presume this should in fact be indicated at M5 Junction 28, associated with the LLM bid for a strategic intervention to deliver growth at Cullompton.</p> <p>The 'Connectivity Plan' also has no mention of the MRN scheme to improve connectivity between the A38 and Newton Abbot.</p> <p><b>Making it Happen / Infrastructure Delivery List</b></p> <p>National Highways endorse the Greater Exeter local planning authorities working together to consider cumulative and cross boundary impacts associated with their local plan growth. As identified in the consultation document, the 'Infrastructure Delivery List' will need to be updated in light of the transport evidence work being done to support the local plans – we anticipate this to include detailed consideration of how impacts on the</p>	<p>The Connectivity Plan on page 28 has been amended so that the 'Proposed improvements to road junction' notation is moved to the position of Junction 28, M5, at Cullompton</p> <p>The Connectivity Plan on page 28 has been amended to include the A382 from Newton Abbot to the A38 .</p> <p>Comment noted.</p> <p>The text on page 30 makes clear the Infrastructure delivery list can be updated.</p>

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	<p>SRN are to be mitigated with funding mechanisms identified.</p> <p>We hope these comments are useful and look forward to continuing to work with the Greater Exeter local authorities in developing sustainable proposals in their Local Plans.</p> <p>Yours sincerely</p>	
Natural England	<p><b>Planning consultation:</b> Consultation on a Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge / Comments invited from Natural England</p> <p>Thank you for your consultation on the above dated 26 September 2023.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment on the emerging Joint Strategy at this stage. We would like to make the following comments:</p> <p>Natural England supports the emergence of this collaborative document which highlights shared</p>	

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	<p>ambitions across a range of strategic planning matters for the area.</p> <p>It would be a beneficial addition to the document to specifically acknowledge coastal change and the impacts this will have on nature and strategic plans. This would include coastal processes such as erosion and flooding and key coastal planning tools such as Coastal Change Management Areas (CCMAs) and Shoreline Management Plans (SMPs).</p> <p>The NPPF maintains that local planning authorities should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast.</p> <p>Coastal Change Management Areas (CCMAs) have been identified as a key coastal planning tool. They are to be defined in Local Plans as areas likely to be affected by coastal change, such as physical change to the shoreline through erosion, coastal landslip, permanent inundation, or coastal accretion (e.g. accumulation of sand), over the next 100 years. Policies and guidance to support this approach are set out in the</p>	<p>The following text has been added in the Nature section: “Our communities benefit from large areas of coastline along the south of the region, stretching from Teignmouth and Dawlish, through the Exe Estuary and into East Devon and encompassing the world famous Jurassic Coast. However, our coastal environment is extremely vulnerable to physical changes through erosion, coastal landslip, permanent inundation and coastal accretion (e.g. accumulation of sand) over the next 100 years. We need to ensure that we reduce the risks arising from these changes by avoiding inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast.”</p>

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	<p>National Planning Policy Framework (NPPF - <a href="#">Here</a>) and its associated Planning Practice Guidance (PPG - <a href="#">Here</a>).</p> <p>The Shoreline Management Plan (SMP - <a href="#">Here</a>) is a key document for CCMA's. It provides the analysis and recommendation for a defined area which may need to be designated as a CCMA. These recommendations when adopted and detailed in Development Plan Documents are for those areas likely to be affected by coastal change, such as physical change to the shoreline through erosion, coastal landslip, permanent inundation, or coastal accretion.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Jemma Short on <a href="mailto:jemma.short@naturalengland.org.uk">jemma.short@naturalengland.org.uk</a>. For any new consultations, or to provide further information on this consultation please send your correspondences to <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p> <p>Yours sincerely</p>	

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Network Rail	<p>Thank you for your time and for consulting Network rail.</p> <p>I have read the document, which is well instrumented, and with the exception of the additional station at Exeter which is proposed in the document but unknown to me , everything else looks good and exciting.</p> <p>I would appreciate if you could clarify the proposed station position.</p>	<p>Network Rail has been advised that the proposed new station shown on the map (page 28) of the Joint Strategy is 'Monkerton', which was identified in the Devon Metro programme. Exeter City Council has safeguarded land for this new station.</p> <p>Network rail has confirmed it does not have any further comments.</p>
Environment Agency	<p>Thank you for the opportunity to provide some comments on this joint strategy for East Devon, Exeter, Mid Devon and Teignbridge.</p> <p>In general we are supportive of this strategy. It acknowledges the shared challenges all four districts will face over the coming decades. From an Environment Agency perspective we are especially pleased to see inclusion of climate change, nature recovery and infrastructure acknowledged as key challenges. Specifically with regard to climate change it is good to see that the challenge is acknowledged not just in respect of meeting Net Zero but also the challenge of adapting to the climate change that is already 'locked in'.</p> <p>It's great that Net Zero and Nature are two of the six 'shared coordinates' that will need to be addressed to achieve your Councils' ambitions. However, on Net</p>	

Respondent	Comments received	Response
	<p>Zero, except for within the text below the title (e.g. ‘...help communities adapt to its impacts...’), there’s little else regarding to climate change adaptation/resilience. The section notes brownfield redevelopment. Redevelopment in the districts’ city and town centres present ‘must do’ opportunities to make these communities resilient and sustainable for the future especially where these correspond with areas at risk of flooding.</p> <p>On Nature it is good to see reference to the emerging Devon LNRS and that it will be used to inform your BNG strategies for development sites. The shared strategy presents an opportunity to develop a shared approach to delivery of BNG (in line with the LNRS) in a way which allows a wider catchment and/or landscape approach to be taken unhindered by administrative boundaries.</p> <p>I hope you find these comments helpful.</p>	<p>Page 9, para 3: Spatial planning has a clear role to play in shifting society towards net zero living whilst also making our communities more resilient to the impacts of climate change.</p> <p>Reference to resilience has been added to the last sentence on page 5: “And they enable us to unlock brownfield growth and investment in existing settlements alongside new settlements to support more self-sufficient, resilient and thriving communities. Page 20 – the word “character” in the first sentence of the second paragraph has been replaced with “sustainability”.</p>
<p>Blackdown Hills AONB Partnership</p>	<p>I’m supportive of the joint approach and shared strategic aims, and it is hard to disagree with any of the ambition.</p> <p>My key point is that the Blackdown Hills AONB has not been mapped correctly – in all cases throughout the</p>	<p>Comment noted.</p> <p>The relevant maps included in the Joint Strategy have been updated to include the correct extent of the Blackdown Hills AONB.</p>

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	document. It looks like only the extent in East Devon has been included.	
South West Water	<p>Thank you for the invitation to comment on the Draft Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge. Pennon Group PLC write on behalf of South West Water limited [SWW] in their function as Statutory Water &amp; Sewerage Undertaker for all four Local Planning Authority areas.</p> <p>To be consistent with our 2025-2030 business plan (available here: <a href="#">Business plan 2025-30   South West Water</a>), SWW wish to highlight some high-level issues and opportunities pertinent to achieving the vision described within the draft document. Some of issues and opportunities have been addressed within the current draft, for which SWW fully support. These high-level aspects include:</p> <ul style="list-style-type: none"> <li>- Water Efficiency: <ul style="list-style-type: none"> <li>o Reuse;</li> <li>o Recycle;</li> <li>o Rainwater Harvesting;</li> </ul> </li> <li>- Drought Resilience: <ul style="list-style-type: none"> <li>o Flood and Drought Cycle Resilience;</li> </ul> </li> <li>- Combined Sewer Connection Restrictions: <ul style="list-style-type: none"> <li>o Adherence to the Disposal Hierarchy;</li> </ul> </li> <li>- Green Infrastructure Principles:</li> </ul>	<p>Comments noted.</p> <p>The words “sustainable water management’ have been added between the words “flood resilience,” and “healthcare and recreation,” in the second paragraph on page 16.</p> <p>The inclusion of reference to “sustainable water management” is sufficiently broad to cover the specific points made by South West Water.</p>

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	<ul style="list-style-type: none"> <li>○ Water Quality;</li> <li>○ Soil Stability;</li> <li>○ Nutrient Neutrality; and</li> <li>○ Slow the Flow.</li> </ul> <p>SWW support the inclusion of sustainable water management through the inclusion of permeable paving, rain gardens and flood resiliency. As Climate Change progresses, we are seeing increased impacts on our water resources and on the landscape itself. With the expected trend of hotter and drier summers, and wetter and milder winters, there is an increased risk of flood and drought cycles becoming a more regular occurrence. Utilising permeable paving and rain gardens will aid in reducing surface water run-off during flood events, reducing potential flows into the sewer network.</p> <p>It is a strategic priority of the business to reduce the current use of Combined Sewer Overflows (see more here: <a href="#">storm-overflows-and-pollutions.pdf (southwestwater.co.uk)</a>). Reducing potential surface water flows from development sites into the combined sewer network will be crucial to achieving this aim. The need for evidenced justification to discount unsuitable surface water disposal methods from the hierarchy, as described within PPG (para 7-056) and Devon County guidance (<a href="#">Sustainable Drainage System - Guidance for Devon - Flood Risk Management</a>), will assist in ensuring the use of combined sewer connections is solely used as a last resort. Additionally, maximising the use of</p>	

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	<p>surface and rainwater on-site will aid in reducing flows entering the sewer network.</p> <p>SWW support the use of water efficiency and water conservation planning policy requirements for development within existing local plans, and would support specific policy encouraging/requiring water reuse, greywater recycling and rainwater harvesting. The promotion of these types of water efficiency techniques are a priority for SWW. As part of SWW's drive towards this aim, SWW have given away 240,000 free water efficiency devices along with the promotion of our Stop the Drop scheme (more info available: <a href="https://southwestwater.co.uk/water-quality-and-resilience.pdf">water-quality-and-resilience.pdf (southwestwater.co.uk)</a>). All of which aid in maximising the sustainable use of water resources and reducing stress on the sewer network.</p> <p>An area SWW would encourage further exploration of opportunities would be through the use of multi-functional green infrastructure. It is noted within the 'Nature' chapter that multi-functional green spaces will provide 'a wide range of functions from flood resilience and carbon storage to food production and recreation'. This goal is additionally supported by SWW in the relation to the water quality, soil stability and nutrient neutrality benefits associated with the use of nature-based solutions and multi-functional green infrastructure, when partnered with Sustainable Drainage Systems. Earlier this year, SWW published our Green First Framework, which sets out SWWs intention</p>	

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	<p>to prioritise the use of nature-based solutions where possible and practical (more info available: <a href="https://southwestwater.co.uk/our-green-first-framework-final.pdf">our-green-first-framework final.pdf (southwestwater.co.uk)</a>).</p> <p>The current draft includes use of urban trees for carbon storage; however, SWW would also highlight their use for solar and temperature regulation. Particularly within urban centres where the urban heat island effect will be exacerbated by Climate Change. The use of strategic deciduous tree placement would enable solar regulation during summers and maximum solar gain during winters. Especially during the summer period, reducing the impact of the urban heat island effect will assist in reducing the need for water to compensate for the increased temperatures; assisting in the sustainable management of our water resources.</p> <p>The vision for Net Zero, as stated within the draft document is supported by SWW. It is essential that Net Zero is achieved to minimise the impacts of Climate Change, of which some have been discussed above. Net Zero is similarly a priority for SWW; during the process of building our 2025-2030 business plan a survey of SWW customers found 9 out of 10 consider it important that SWW are an environmental leader in the region (<a href="https://southwestwater.co.uk/net-zero-and-environmental-gains.pdf">net-zero-and-environmental-gains.pdf (southwestwater.co.uk)</a>). Progress has already been made in this sector through SWWs continuing transition</p>	<p>The words “ , and solar and temperature regulation,” have been added between the words “carbon storage” and “such as...” in the fourth bullet on page 9.</p>

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	<p>to an all-electric vehicle fleet and increasing our sustainable energy generation capacity.</p> <p>It is noted within the Net Zero chapter that the use of a district heat network is proposed within the councils' vision. To further understand the impacts this could have on SWWs water resources, we would like further information on the scope of use for this type of infrastructure.</p> <p>Thank you again for the opportunity to comment on this draft document, and we look forward to further collaboration with you in future.</p>	
<p>East Devon AONB Partnership</p>	<p>Thanks again for sharing.</p> <p>As you say, it's at such a high level its hard to make any significant comments other than welcoming the sense of direction and the coordinated approach and the role that AONBs can play in helping to achieve the vision. There are obvious questions on some of the statements around how and who..... But that's not for discussion at this level.</p>	<p>Comments noted.</p>

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	<p>We welcome the strategic joint approach and reinforce the important role protected landscapes can play in driving its vision.</p>	
<p>National Health Service</p>	<p>Thank you very much for forwarding the Consultation on the Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge and please accept our apologies for the late response.</p> <p>We have noted the following references to Health Care Infrastructure and thought it worth providing some context, not necessarily for inclusion in the strategy although may help to support the statements below.</p> <p>Page 7: The importance of investment in infrastructure (such as transport, green infrastructure, utilities and <b>health care</b>) to support growth, is a cross-cutting theme throughout the document.</p> <ul style="list-style-type: none"> <li>• Page 16: Our new homes need to be supported by the right type of <b>infrastructure</b>, including transport, utilities, flood resilience, <b>healthcare</b> and recreation, and we will set out strategic priorities and seek targeted investment and funding to ensure we can meet our high ambition.</li> <li>• Page 30: Infrastructure delivery list:- <b>Strategic healthcare provision.</b></li> </ul>	<p>Comments noted.</p> <p>There will be continued engagement with the National Health Service in relation to strategic planning and infrastructure across the four local authority areas.</p>

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	<p>The Devon health system has been rated as NOF4 in the NHS Oversight Framework. This means that Devon receives ‘intensive’ support from NHS England, which includes additional reporting requirements and financial controls with the aim of improving its financial and operational performance. The NHS providers across Devon have been and continue to work collaboratively to address the issues highlighted and improve our overall improvement. We have established a system-wide programme of work to deliver the performance and financial improvements needed to allow Devon to move out of NOF4.</p> <p>One area of focus is both the condition and capacity of the existing health care infrastructure and identified that there is a capital investment requirement of £3bn (2024 and 2030) but are only likely to receive £82m of funding available which will have to be prioritised for our high and critical risk backlog leaving little for investment projects or to increase capacity.</p> <p>We appreciate the collective support provided by all of the Local Planning Authorities across Devon and look forward to being part of and contributing to each Local Plan ensuring that we have the right infrastructure and capacity to support both existing and future residents of Devon.</p>	

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	Please do not hesitate to contact us for any further information or engagement.	