



Devon & Cornwall Police

Building and Estates Department

Police HQ Middlemoor

Exeter

EX2 7HQ

19 January 2026

Planning Policy Section (Local Plan Consultation)

East Devon District Council
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Via email: LocalPlan@eastdevon.gov.uk

Dear East Devon District Council,

Representations on behalf of Devon & Cornwall Police to Second Regulation 19 Local Plan Consultation

Thank you for consulting Devon & Cornwall Police (DCP) and The Office of the Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly (PCC) together the 'Police' on the recent publication of the East Devon Local Plan, Second Regulation 19 consultation.

The Police via Womble Bond Dickinson submitted comments to the First Regulation 19 version of the emerging Local Plan in March 2025 which specifically related to the Police's infrastructure requirements and delivery, together with the planned 'Second New Community' at Marlcombe. Whilst we note that those representations remain valid and will be forwarded to the Planning Inspectorate when the Plan is submitted for Examination, the Police wish to make additional representations commenting on the specific changes listed in the Schedule of Changes only.

Please note that the comments made below are entirely separate and in addition to any representations made by other Departments within Devon & Cornwall Police, in particular the Designing Out Crime Team (DOCO).

REVIEW OF CHANGES TO SECOND REGULATION 19 LOCAL PLAN

DCP's Response to Changes to Policy SP07: Delivery of Infrastructure

- i. The Police support the proposed change to Strategic Policy SP07 A which now includes wording that requires applications for development to take account of infrastructure requirements where not already identified in a development allocation policy or the IDP.

- ii. In addition, the proposed inclusion of paragraph 3.44b which confirms that the Council will work with relevant infrastructure and service providers to ensure the timely and effective delivery of infrastructure explicitly referencing the “Police” is welcomed, alongside the use of planning obligations (s106) to secure the provision and ongoing maintenance of police infrastructure.

DCP’s Response to Changes to Policy WS01: Development of Marlcombe, New Community East of Exeter

- i. The proposed change to the inclusion of “*creating safe and attractive places*” within draft Policy WS01 accords with the social objective of achieving sustainable development within the NPPF and should be retained.
- ii. The proposed inclusion of “*Wider Infrastructure*” which makes provision for a “*L. Blue Light Facility*” within the overall development proposals at Marlcombe is strongly supported. The Police note that this is reflected in the updated version (2) of the Council’s Infrastructure Delivery Plan (IDP), November 2025 which has been published alongside this consultation. It confirms that COM-4 (Blue Light Facility, Marlcombe) is a Priority 2* Project that will be delivered by way of **development contributions, Devon and Cornwall PCC and Devon and Somerset Fire and Rescue** (our highlighting).

Whilst the Police have previously expressed their concerns in relation to the proposed funding sources to deliver police infrastructure to create the “*safe and attractive places*” which Policy WS01 is seeking to achieve, the proposed allocation for Marlcombe is a meaningless gesture without funding from developer contributions to cover the full cost of delivering the ‘Blue Light Centre’ identified in Policy WS01. It follows that if funding is not made available for infrastructure, then it simply will not be delivered (as it wasn’t at Cranbrook). The consequence will be that the policy requirement and need for the infrastructure to be provided will not be met, resulting in Marlcombe becoming an unsustainable ‘New Town’. The Police note that other Community Facilities Projects for Marlcombe within the IDP are proposed to be funded from ‘Development Contributions’ entirely - including the new Health Facility - and therefore it is only justified that the same approach is applied to the delivery of the ‘Blue Light Facility’ which is of equal importance in the delivery of this development scheme.

The Council is aware that the principle of seeking contributions towards policing infrastructure is well established within both National and local policy, and as such it is essential that qualifying infrastructure which is already recognised as eligible for developer contributions is secured through Section 106 Agreements and CIL for the delivery of the proposed ‘Blue Light Centre’ at Marlcombe.

The Police therefore request that the IDP is amended in relation to COM-4, with the following revision shown in **bold**:

Community Facilities Projects							
Reference	Priority	Location	Project	Potential Funding Sources	Time-scale	Delivery Organisation(s)	Notes/ additional justification
COM-4	2	Marlcombe	Blue Light Facility	Development Contributions, Devon and Cornwall PCC, Devon and Somerset Fire and Rescue	2029 - 2042	FBE Devon and Cornwall PCC and Devon and Somerset Fire and Rescue	Additional demand generated from levels of proposed growth at Marlcombe

It follows that Section 17(1) of the Crime and Disorder Act 1998 (1998 Act) places a duty on all local authorities to consider crime and disorder implications. Paragraph 101 of the NPPF places “*significant weight*” on the need for police infrastructure and facilities to be considered in the decision-making process. This has also been strengthened within the recently published consultation draft NPPF, particularly draft Plan-making Policy HC1 which clearly defines “public service infrastructure” together with the requirement for development plans to understand existing deficits, and additional requirements arising from proposed development to reflect the wider changes in local population which is of direct relevance to the development proposed at Marlcombe that will not only necessitate additional policing, but also cross-boundary issues with Exeter City.

There is clear National and local policy, including appeal decisions in support for the need for police infrastructure and facilities.

The proposed policies in the East Devon Local Plan should be modified to ensure there is sufficient regard to the provision of police infrastructure and facilities, together with funding resources through contributions and obligations secured through Section 106 Agreements, and CIL.

The Police would request to be notified of the following subsequent stage of the local plan-making process, including the submission of the Plan for Examination. We would also like to reserve the right to participate at the subsequent Examination Hearings of the East Devon Local Plan.

Yours faithfully,

Iain Masters MRICS
Estates Development Manager
Buildings & Estate Department

Enc: Representation Form in relation to WS01