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Second Regulation 19 Consultation – East Devon Local Plan – Responses by Chapter

Filtered Data Export

9.6

Full name: Margaret Leppard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Paragraph

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

9.6

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: I support green and nature tourism

9.59

Full name: Callum Robinson

Organisation (where relevant): Laister Planning Limited

Other party name (if relevant): ELL Holdco Limited

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Paragraph

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

9.59

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

1(c). If the comment is related to a site, please state the site reference here.: No

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: No

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: .

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.: Please refer to accompanying document 'Reps to East Devon District Plan Reg 19'

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to accompanying document 'Reps to East Devon District Plan Reg 19'

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: .

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to accompanying document 'Reps to East Devon District Plan Reg 19'

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to accompanying document 'Reps to East Devon District Plan Reg 19'

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.: .

4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.: .

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Please refer to accompanying document 'Reps to East Devon District Plan Reg 19'

SE02

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: 'It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, biodiversity and landscape of the rural area particularly within the NLS'. Whilst we welcome a statement which protects biodiversity from harm, as above this does not reflect the requirement of the NPPF. This sentence should be reworded to include the requirement to enhance biodiversity.

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Policy SE02 concerning rural and new agricultural buildings should require the carbon reducing technologies to be an integral part of the designs, as well as water efficiency measures.

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: The theme within this policy is that outside development limits, support for development will be very limited to expansion of existing sites only, and only within the existing operational site boundaries. There are often circumstances where local businesses want or need to grow, and by restricting the ability of a site to expand beyond the existing operational boundary of a site is overly restrictive and has the potential to stifle local businesses. This is not positively planned, is overly restrictive and is not sound due to being unjustified and ineffective.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: George Lewis

Organisation (where relevant): Savills

Other party name (if relevant): FWS Carter and Sons

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Savills on behalf of *** Personal details have been removed ***

2. There are huge economic growth and productivity challenges within the UK, with growth virtually stagnant for many years. A key objective of the Labour Government is to drive economic growth and planning reform is a key tenet of that objective.

3. In her Statement on 27 January 2025, Chancellor of the Exchequer *** Personal details have been removed *** MP set the scene, reaffirming her commitment to delivering economic growth and stating: “I am fighting every single day in our mission to kick start the economy, deliver on our Plan for Change, and make working people better off. That includes avenues that others have shied away from. Too often the answer to new development has been “no”. But that is the attitude that has stunted economic growth and left working people worse off. We need to do things differently and that journey began as soon as I started at the Treasury in July. These are our next steps and I can say for certain, there is more to come.”

4. There can be no doubt that this Government is committed to delivering economic growth in the short, medium and long-term. To achieve this step change within East Devon will require a policy framework in the Local Plan which moves away from the traditional predict and provide approach and allows for greater flexibility in securing economic growth.

5. Such an approach would be entirely consistent with national policy in paragraphs 85 and 86 of the Framework. Paragraph 85 sets the scene stating that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” [emphasis added]

6. Paragraph 86 then goes on to provide a direct policy requirements for local plans. Of particular relevance to policy SE02 is criterion E of paragraph 86 which states: “Planning policies should: ... be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”

7. By restricting growth outside of existing designated employment areas, Policy SE02 as currently drafted is unnecessarily restrictive, inflexible and therefore incompatible with the Framework. It does not incorporate the flexibility sought by Paragraph 86 of the Framework and on the contrary restricts economic growth to land within existing operational site boundaries. Such an approach is also in conflict with the spirit of Government economic policy on the drive to support growth. The policy is not therefore consistent with national policy and is therefore unsound.

8. Whilst the allocation of land plays an important part in this and provides certainty, alongside this national policy envisages a flexible approach which enables further land to come forward where it is demonstrated that this would support economic growth in locations which are desired by the market and are capable of responding rapidly to changes in economic circumstances.

9. To that end, and in order to remedy the unsoundness of the local plan, we advocate the addition of the words "or adjacent to" within the first paragraph of policy SE02. This change would enable the growth of existing businesses and business parks beyond their existing boundaries where it is demonstrated that they are currently operating at or close to full capacity and that there is a demonstrable economic need which that expansion would satisfy.

10. In addition to addressing the unsoundness of the Local Plan, there would be a number of benefits in making this change to the policy.

11. First, it would provide considerably greater flexibility to ensure that the wider economic needs of the functional economic area are accommodated. As explained within other representations, there is significant change proposed within the Exeter City Local Plan which will see the replacement of many traditional employment areas with mixed use residential and office floorspace. This will inevitably displace existing businesses and remove land and buildings available to a wide range of businesses including many SME and start up operators. These businesses will either close or look to relocate and opportunities therefore needs to be provided to accommodate this growth within the wider functional economic area. 12. Second, as paragraph 86 of the Framework suggests, flexibility is required to enable a rapid response to changing economic circumstances. It is impossible to determine and defined through the Local Plan precisely where all businesses will seek to locate. There may be some where the profile of the Exeter Science Park is important, whereas for others affordable, less prestigious surroundings are needed to meet the requirements of the business. Positively supporting growth across a wider variety of locations would ensure that all opportunities are taken to achieve economic growth objectives.

Conclusion 13. In conclusion, Policy SE02 as currently drafted is unduly inflexible, not consistent with the Framework and therefore unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A relatively minor change to the policy which enables the growth of existing businesses and business parks where there is a proven economic need, would remedy this unsoundness and deliver economic benefits to East Devon during the plan period.

Full name: Margaret Leppard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: Appreciate the new agricultural buildings conditions

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: again does EDDC have resource for monitoring

Full name: Lisa Turner

Organisation (where relevant): Blackdown Hills National Landscape

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: In part.

We welcome the addition of a section on new agricultural buildings into this policy, as we have previously highlighted the lack of this policy as a significant omission in respect of guiding development in the countryside.

We think that there should be clearer, more specific guidance on protecting the environment and amenity from unfettered and inappropriate employment development in the countryside.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy SE01 states that proposals will be permitted where proposals are compatible with neighbouring developments and land uses and will not give rise to adverse amenity impacts or undermine plan strategy or specific policies directly relevant to the use of the land in question. A similar statement should be included in SE02. Alternatively, an explanation of what is meant by ‘socially and environmentally acceptable’ should be included in the policy justification.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: ‘It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, biodiversity and landscape of the rural area particularly within the NLs’. Whilst we welcome a statement which protects biodiversity from harm, as above this does not reflect the requirement of the NPPF. This sentence should be reworded to include the requirement to enhance biodiversity.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Policy SE02 includes a new section on New Agricultural Buildings. While this appears a helpful addition to the plan, we request that clause A is amended to ensure that heritage is taken into account, particularly bearing in mind that many rural farmsteads are historic.

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

Text to be added is shown in square brackets []

“A. It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, [heritage,] biodiversity and landscape of the rural area particularly within the NLs.”

SE04

Full name: Philip Wragg

Organisation (where relevant): Sid Vale Association

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE04

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: While the intent of Policy SE04 is understood, we submit that a more flexible criteria-based approach is required to prevent the stagnation of the local built environment.

Specifically, the policy as drafted fails to account for the structural shifts in the hospitality sector, where smaller hotels and Bed & Breakfasts are increasingly unviable due to the rise of unregulated short-term holiday lets. A rigid resistance to the loss of these employment sites risks creating a legacy of vacant and derelict 'brownfield' buildings within the conservation area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We recommend the policy be amended to include a simple 'Viability test' and / or marketing period. This would allow for the Change of Use to residential (either as single dwellings or apartments) where employment use is no longer sustainable, thereby contributing to local housing stock and ensuring the continued vitality of Sidmouth's townscape.

Full name: Philip Wragg

Organisation (where relevant): Sid Vale Association

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE04

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: While the intent of Policy SE04 is understood, we submit that a more flexible criteria-based approach is required to prevent the stagnation of the local built environment.

Specifically, the policy as drafted fails to account for the structural shifts in the hospitality sector, where smaller hotels and Bed & Breakfasts are increasingly unviable due to the rise of unregulated short-term holiday lets. A rigid resistance to the loss of these employment sites risks creating a legacy of vacant and derelict 'brownfield' buildings within the conservation area.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We recommend the policy be amended to include a simple 'viability test' and / or marketing period. This would allow for the Change of Use to residential (either as single dwellings or apartments) where employment use is no longer sustainable, thereby contributing to local housing stock and ensuring the continued vitality of Sidmouth's townscape.

SE05

Full name: Samantha Thomas

Organisation (where relevant): Carney Sweeney

Other party name (if relevant): Stuart Partners Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

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

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: It is noted that the guidance on the requirements for an Employment and Skills Statements is now available and provides further guidance on what is required.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

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

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: POLICY SE 05 : EMPLOYMENT AND SKILLS STATEMENTS – MODIFICATION REQUIRED

7.45 The Cherwell Group are supportive of the use of employment and skills statements being required to be approved and implemented alongside development. This will ensure that social value and economic development is realised at a local level from the construction phase.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Notwithstanding this in principle support, it is noted that as currently drafted, Policy SE05 requires employment and skills statements to be “submitted with the planning application.” However, often in the case of strategic development, applications will be submitted in multi-stages, with the principal decision often not providing exact certainty over the quantum of development that will ultimately be approved at the subsequent stages of the planning process. This is important as Guidance produced by the National Skills Academy for Construction and the Construction Industry Training Board requires an understanding of the construction value of the development, which may only be known once reserved matters have been approved.

7.47 It therefore may be a more justified proposition to advocate an approach where the requirement for employment and skills strategies is a conditional requirement of a

principal permission, with the requirement for the work to be prior to the commencement of development.

Full name: Margaret Leppard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: Appreciate need for developers to provide employment and skills plan must include support for employment and skills to be used in management of common areas, NBS and SUDS in residential developments. Local bursaries available through colleges

Full name: Robin James Meadwell

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE05

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: A number of Developers are national businesses and operate by appointing Design & Build Contractors with a national presence to undertake the construction works. Many D&B Contractors have an existing permanent workforce of thousands covering regions around the UK. Any large scale construction of housing development would likely entail the use of an existing workforce and associated trades and sub-contractors are often businesses which have worked on numerous previous projects. Large scale housing development does not of itself create employment or employment opportunities in large numbers. Whilst this policy would seek assurances from Developers to provide skills training and employment opportunities, in practice this is unlikely to be achieved as it is contrary to the existing business models of a number of large Developers and Construction businesses.

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is a matter for EDDC to ascertain whether this chapter complies with the duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

SE06

Full name: Emma Morrison

Organisation (where relevant): Pegasus Group

Other party name (if relevant): The Co-op Group Food Ltd.

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE06

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: This sets out the retail hierarchy, although the hierarchy is not within the main body of the Policy, but within the supporting text. Although not a point of soundness, it is recommended that the hierarchy in para 9.32 is moved into the policy itself for clarity. January 2026 | PR/EM | P25-3363 16

4.32. The opening paragraph of the Policy sets out the overall strategy for the centres. A further point of clarity should be added, as per the underlining below, so it is consistent with the NPPF para 90b and its Annex which confirms the uses appropriate in town centres, as set out below: Tier one and two towns form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other [Town Centre] uses that attract and are used by people for commercial or community activities.

4.33. The supporting text similarly needs to be updated, specifically para 9.31, as it confirms “that the NPPF promotes competitive town centre environments and growth management”, but this also needs to include the support for diversification, to be consistent with NPPF para 90a.

4.34. This also needs to be reflected in Para 9.33, as it is not only shops that are crucial to maintaining vitality and viability of centres, but all uses within the centre.

4.35. Finally, the fourth paragraph of the Policy and the sequential text within para 9.33 needs to be deleted, as these elements are covered in Policy SE07.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

SE07

Full name: Emma Morrison

Organisation (where relevant): Pegasus Group

Other party name (if relevant): The Co-op Group Food Ltd.

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Put simply, this policy needs some significant re-writing to be considered sound, as it is not consistent with Section 7 of the NPPF. It is not positively prepared, it is not justified and it will not be effective in supporting the vitality and viability of defined centres.

4.37. Town Centre Areas (TCA) and Primary Shopping Areas (PSA) are defined within the EDLP for the tier one and two towns. As set out earlier, Co-op have significant issues with the definition of the town centre area and the primary shopping area for Axminster. In and around the former Co-op, there are a large number of residential dwellings included within the defined PSA and TCA.

4.38. In essence the PSA, as drafted, does not define where retail development is concentrated (our emphasis). The TCA, as drafted, does not accurately define the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. This is a requirement to comply with the NPPF.

4.39. This is most obviously displayed within the Council's 2022 survey of Axminster, in and around Church Street. There is only one shop in a circa 160m run and the other town centre use within the run is a surgery. Town centre uses are not the pre-dominant land use and retail uses are not concentrated here.

4.40. Given the passage of time between the surveys and the drafting of evidence (Ref:ECN-007), the Co-op store no longer trades from this location. In order to reflect the actual position on the ground, this area of the town centre needs to be removed from both the TCA and PSA. In order to accurately reflect the area reflected by town centre uses concentration of retail development and Co-op have provided our view on the extent of the this in the attached at Appendix 1. The second paragraph of the Policy seeks to arbitrarily constrain the acceptable uses within centres, limiting those uses to retail and leisure. This is not compliant with the NPPF Annex 2 which defines main town centre uses. The Council should focus on supporting a wide range of town centre uses across the centre, to capture the benefits that flow from this such as street level activity, pedestrian movements, and vitality and viability improvements, as opposed to constraining main town centre uses within the defined centres. As such Co-op recommend that this second paragraph is amended as follows: Proposals for main town centre development (as defined in the Annex to the NPPF) within the Town Centre Areas (and excepting Cranbrook which is subject to the policies of the Cranbrook Plan), as defined on the Policies Map, will be permitted. (where they improve the quality and/or broaden the range of retail and leisure facilities, enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability.) Within the second paragraph, the first sentence is broadly acceptable, subject to correctly defining the PSA.

4.43. The third sentence needs deleting, as this seeks to restrict residential uses within the PSA. This is relevant, as if the Council do not intend to correct the PSA to properly reflect the concentration of retail uses, this could constrain development. It is also a curious approach against a context where the Council are currently seeking to include many residential dwellings within the proposed PSA – most obviously and as raised before along Church Street.

4.44. This also feeds back to sentences two and three in the second paragraph which seeks protect the PSA for predominantly retail and leisure uses. Just on this point, Para 90f of the NPPF is relevant, which states that: Planning policies should: recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

4.45. Therefore, there is no support in the NPPF for a more onerous ‘test’ for residential uses within centres. It is recommended that the middle sentences of the second paragraph are amended to state: Development proposals for other town centre uses within the Primary Shopping Areas will only be permitted where the majority of the total ground floor units are facilitating retail or leisure uses. Unless it can be demonstrated that there is no longer a retail or leisure demand, other town centre uses (including residential) will not be permitted on the ground floor within the Primary Shopping Areas. Unless it can be demonstrated that there is no demand for any town centre use

residential uses will not be permitted on the ground floor within the Primary Shopping Areas.

4.46. Co-op note the need for a marketing exercise, with the detail enclosed within footer 78 on Pg 185. Co-op do not have any particular concerns on the requirements at this stage, but do reserve the right to make comments in due course.

4.47. In relation to the support text to the Policy, there will be a need to make various consequential changes including: Para 9.37 – supporting wider town centre uses in town centre locations and accepting residential uses can be acceptable;

- Para 9.39 – reflecting the NPPF's support for residential uses as appropriate in town centres

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Emma Morrison

Organisation (where relevant): Pegasus Group

Other party name (if relevant): The Co-op Group Food Ltd.

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

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

3.1. Given the stage of the process of the EDLP, there is a reasonably well-developed evidence base to support the plan. An overview of this is provided below: ECN-011 - Greater Exeter Town Centre and Retail Study Part One (September 2017)

3.2. This Study was jointly commissioned by East Devon District Council (EDDC), Exeter City Council (ECC), Mid Devon District Council (MDDC), Teignbridge District Council (TDC) in partnership with Devon County Council. The objectives of this study, as identified in the brief issued by the Councils, are as follows:

- A review of salient retail and town centre trends across the UK in order to set the context for developing a retail and town centre strategy in the GESP;
- A series of town centre health checks covering all of the main town centres in the MDDC, TDC and EDDC administrative areas;
- An updated survey of household shopping patterns covering an area which is sufficiently wide to gather data on convenience and comparison goods;
- Assessments of quantitative and qualitative retail floorspace need for each of the main settlements in the ECC, EDDC, TDC and MDDC administrative areas

3.3. Axminster is covered in this Study, albeit the findings of this are now considered out of date and should not be used to inform decisions over the upcoming Plan period.

3.4. Nevertheless, and as context Axminster's health is covered in Section 6, Pg 118 onwards. It sets out at para 6.168 that "the defined Town Centre Shopping Area covers West Street, Castle Street, Chard Street, Victoria Place, Lyme Street, Victoria Place, South Street and Church Street, along with the Tesco supermarket (and car park) at Shand Park. There is also a defined primary frontage which runs along West Street, Silver Street, Trinity Square, Chard Street and the southern end of Victoria Place".

3.5. The healthcheck is summarised at para 6.196 confirming that "Axminster is a reasonably healthy town centre. The current land use profile identifies the town has an above average proportion of convenience goods retailers including a large Tesco supermarket and a number of independent convenience goods retailers. However, the centre only attracts under half of first choice main food shopping trips from the local area, and just over half of top-up food shopping trips".

3.6. There is no assessment of need within the part one study, despite the overview set out above claiming it would. January 2026 | PR/EM | P25-3363 8 ECN-012 - Greater Exeter Town Centre and Retail Study Part Two - Retail Needs Assessment and Retail Strategy (December 2019)

3.7. It is clarified in the introduction that the part one Study did not cover needs, as initially anticipated, so this part two study sought to provide an assessment of the quantitative and qualitative retail floorspace need for each of the main settlements. This includes Axminster within East Devon District Council area.

3.8. It also makes recommendations regarding the various tiers of the 'town centre' hierarchy in the Greater Exeter area and a recommended strategy for each town.

3.9. It is also supported by a new shopper survey, although there is no date to confirm when this was undertaken and the raw results are not available for any detailed interrogation.

3.10. Specifically in relation to Axminster, the Part Two Study sets out:

- Para 3.12 – "Table 9g in Appendix II indicates that existing convenience goods stores attract £21.4m of expenditure which can be compared with a much higher benchmark turnover for these stores of £42.7m. This suggests a significant over-supply of convenience goods floorspace in the town, to the tune of -1,780sq m net. The stores contributing to this situation are the two largest stores in the town centre – Tesco and the Co-op store on West Street – which are both trading well below their respective company average performance levels" (Pegasus Emphasis).
- Para 3.13 – "Table 10g indicates that the current study area derived turnover of the town [for comparison goods] is higher than the benchmark turnover of the town (which has been brought forward from the most recent East Devon retail study and updated to a 2019 base level). This suggests an indicative capacity of 930sq m net at 2019, rising to

1,167sq m net at 2024 and 1,546sq m net at 2029. We do not consider that there is an overriding need to plan for this modest uplift in comparison goods floorspace in Axminster bearing in mind the size of the town, the state of the comparison goods sector and the likelihood that any significant comparison goods in this part of Devon is likely to be directed towards Exeter."

3.11. Axminster was confirmed, at the time, of accommodating around 14,600sqm of floorspace.

3.12. In respect of the proposed hierarchy, it was recommended to be identified as a smaller centre. ECN-007 - Evaluation of Town Centre and Retail Policy Boundaries and the threshold for the Sequential Test (September 2023)

3.13. This topic paper is prepared to consider the current retail situation in East Devon and seeks to justify the policies within the emerging Local Plan. Para 1.3 sets out that it provides an assessment of boundaries for town centre and retail policies and explains why the national sequential test threshold is inappropriate and a lower threshold is justified in East Devon. .14. For the avoidance of doubt, national policy does not include a threshold for sequential assessments, only impact assessments.

3.15. The topic paper confirms that the NPPF 2018 removed the expectation for local authorities to define primary and secondary frontages within their town centres. In light of this, it used the December 2023 NPPF definitions, which was the most up to date iteration of the NPPF at the time.

3.16. The definitions within the 2024 NPPF are largely unchanged, except for the addition of concert halls, hotels and conference facilities within the definition of main town centre uses.

3.17. The paper also sets out various reviews as to the role of town centres, including the report (parliament.uk) around high streets and town centres in 2030 which helpfully sets out a vision for town centres which will act as:

- Activity-based community gathering places;
- Retail is a smaller part of a wider mix;
- Green space, leisure, arts/culture, health & social care services, housing; and
- Space for social & community interactions

3.18. The paper also references the Build Back Better High Streets Paper which identifies five priorities for centres, including "Planning flexibilities around change of use; enabling vacant commercial premises to be demolished and a new development right to convert empty shops, restaurants and offices into homes".

3.19. To support the paper, town centre assessments were undertaken in September 2022 (Table 3, para 3.18). Town centre areas are covered from para 4.7 onwards and confirm that “The policy approach advocated is one of defining Town Centre Areas to encompass broad central areas in towns where there is existing retail and commercial activity and potential to accommodate more activity”.

3.20. Para 4.8 sets out that “Primary Shopping Areas are the areas within the town centre where most retail activity is concentrated”, going on to set out that “Other uses, including residential, that would undermine the shopping and leisure function of the Primary Shopping Areas will be resisted as non-active use and ‘blank’ frontages will lessen the offer and appeal to visitors”.

3.21. It also confirms that “In most cases the town centres are relatively compact and are focussed around the concentration of retail/leisure uses. In these cases, the Town Centre Areas and Primary Shopping Areas will be the same and the boundaries will be concurrent.” this appears to be the case for Axminster.

3.22. The survey results for Axminster are discussed on page 19 and the associated survey plans are provided thereafter. For ease, the area around the former Co-op store is extracted below:

3.23. At the point in time of the survey (September 2022), the Co-op store was occupied and correctly noted above as a foodstore. Accordingly, this Paper (September 2023) recommends that as part of the emerging development plan, the centre should be extended in the location of the now former Co-op. Site Allocations – SAL 005 – Axminster (February 2025)

3.24. The Co-op site was assessed as part of the site allocations assessment paper. The site starts on Pg 11, identifying the site and then assessing its suitability for residential development. The site is acknowledged to be brownfield in nature.

3.25. Looking into the matters considered, it sets out that it “may be difficult to extend primary provision to accommodate housing levels beyond those set out in current local plan”. It’s a strange response to the development of a site within what is probably the most sustainable location of Axminster, especially as the site is proposed to be promoted through and seeks to be allocated as part of the plan process. In any case, the site is modest in scale, would not have such an impact on education capacity in the wider area. It is also noted that this comment has been made against all Axminster sites which have been carried forward to allocation and therefore should not be considered sufficient reason to disregard the residential potential of this site.

3.26. There does not appear any overarching technical reason why this site should be retained as a retail site and not allocated for housing.

3.27. The reason given that the site not been allocated is as following; The site is located within the proposed town centre and primary shopping area, where development should enhance the range and quality of town centre, shopping and leisure facilities. Redevelopment of the site for housing would be incompatible with this as it would result in the loss of a supermarket.

3.28. The fact is that the site is currently outside of the defined town centre boundary. As set out above the proposed town centre boundary has been drawn in a location which can no longer be considered appropriate given the evidence on the ground. This is covered in detail throughout these representations.

3.29. In addition to this, the foodstore at the site has already been lost, and was earmarked for loss when the Council undertook their Call for Sites. It seems strange that the Council is seeking to protect the site as a foodstore and extend the town centre boundary when the Council's own evidence confirms that there is a significant over supply of convenience goods floorspace such that existing stores were significantly underperforming.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Margaret Leppard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE07

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

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: SE07 Town Centre Development Local shops and services

SE10

Full name: Callum Robinson

Organisation (where relevant): Laister Planning Limited

Other party name (if relevant): ELL Holdco Limited

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

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

1. Introduction to Representations

1.1. These representations have been prepared on behalf of ELL Holdco Limited, the owners of Hornbeam Country Park, Dunkeswell, Honiton, EX14 4XW in response to East Devon District Council's (EDDC) emerging East Devon Local Plan 2020 to 2042 Second Regulation 19 Publication Draft November 2025 which runs until 26 January 2026.

1.2. Hornbeam Country Park is a holiday caravan park which is identified in the emerging East Devon Local Plan 2020 to 2042 as being within Dunkeswell settlement boundary.

1.3. This submission responds to the second Regulation 19 Second Regulation 19 Publication Draft and where relevant, the supporting evidence base, also taking into considering national guidance within the National Planning Policy Framework - December 2024 (hereafter referred to as the NPPF) and National Planning Practice Guidance (hereafter referred to as NPPG).

1.4. These representations have been prepared having primary regard to the extant version of the NPPF, which currently provides the operative national policy basis for plan preparation and decision-taking. However, due regard should be given to the emerging National Planning Policy Framework 2025, which is presently subject to public

consultation until March 2026. Although the emerging Framework does not yet attract full statutory weight, it signals a clear direction of travel in national planning policy, including the introduction of new national decision-making policies and a strengthened emphasis on plan responsiveness, delivery, and sustainable growth.

1.5. In this context, the policies of the emerging Local Plan should be framed with sufficient flexibility and consistency to ensure alignment with forthcoming national policy requirements, to avoid early obsolescence, and to ensure that the emerging East Devon Local Plan 2020 to 2042 can be found sound, effective and capable of being implemented throughout the plan period. Appropriate weight should therefore be afforded to emerging national policy principles when assessing the justification, effectiveness and consistency of the Local Plan’s strategy and development management policies.

2.1. These representations, specifically refer to Policy SE10: Sustainable Tourism, the supporting text at paragraph 9.59 and the evidence base referred to in footnote 85 to paragraph 9.59. The evidence base in footnote 85 comprises ECN-014 Marketing Statement Guidance and ECN-017 Viability Statement Guidance.

2.2. Policy SE10 Sustainable Tourism sets out EDDC's approach to visitor accommodation, facilities and attractions and states that such development within settlement boundaries will be supported and encouraged where they are of an appropriate scale for the locality and minimise reliance on the private car.

2.3. Policy SE10 is then split into three parts comprising 1) Tourism development in the countryside 2) Loss of Existing Visitor Accommodation and 3) Proposals for new Tourist Attractions/Facilities or Accommodation

2.4. Our representations specifically relate to the second part ‘Loss of Existing Visitor Accommodation’ which states: ‘The loss of any visitor accommodation to other uses will only be permitted in exceptional circumstances. For example, converting holiday accommodation into low cost staff accommodation (rented residential accommodation for local workforce), which will address recruitment challenges for the tourism sector.’

2.5. The supporting text at paragraph 9.59 states: ‘The Council will resist the loss of permanent visitor accommodation unless it is financially unviable, requiring evidence through marketing requirements. 85.’

2.6. The evidence base in footnote 85 comprises ECN-014 Marketing Statement Guidance and ECN-017 Viability Statement Guidance. This evidence only relates to employment uses and doesn’t include any reference to the economic viability considerations that apply to the loss of visitor accommodation. Response

2.7. The operators of Hornbeam Country Park, have significant experience and knowledge operating holiday parks across the UK, including Devon. They support the overall objective Policy SE10 is seeking to retain holiday parks that are economically viable and provide visitors with good quality accommodation, thereby contributing to the visitor economy. However, there are holiday parks that are not viable or attractive, taking into consideration numerous factors, including their location, range of facilities, and quality of accommodation. It is important in policy terms to provide more flexibility to enable those holiday parks to be updated and modernised and where feasible enable other suitable uses in appropriate locations.

2.8. In relation to the promotion of sustainable development, the NPPF is clear that the planning system should pursue sustainable development by balancing environmental, social and economic objectives (paragraph 8). As currently drafted, the policy, supporting text and evidence base places a strong emphasis on protection, with limited explicit recognition of achieving balanced outcomes, such as the economic and social and environmental benefits arising from well-designed development.

2.9. In terms of building a strong, competitive economy, the NPPF paragraph 85 clarifies from the outset that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

2.10. As currently worded Policy SE10 is overly restrictive in its wording that the loss of visitor accommodation is only allowed in exceptional circumstances. In our view this does not align with the promotion of sustainable development creating balanced outcomes as defined in paragraph 8 of the NPPF. Furthermore, it provides no opportunity for visitor accommodation businesses to adapt in accordance with NPPF, paragraph 85.

2.11. On this basis we do not consider the Local Plan accords with the tests of soundness, in particular being justified and consistent with national policy.

2.12. Policy SE10 provides just one example of alternative uses which it considers provide exceptional circumstances to support the loss of visitor accommodation, namely for low cost staff accommodation. There is no evidence justification which supports this type of housing need as an alternative use to visitor accommodation and again the policy wording is overly restrictive. This does not reflect the possibility that there are holiday accommodation sites, within settlement boundaries, that no longer function well as holiday parks, for example because of their location in relation to permanent residential development, their lack of facilities and other location-related

issues. The policy needs to take a more balanced view, allowing site-specific considerations to be considered when making a judgement about loss of accommodation.

2.13. Again, we do not consider the Local Plan accords with the tests of soundness, in particular being justified and consistent with national policy.

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

2.14. Accordingly, Policy SE10 should be amended in line with the approach set out in paragraph 9.59 that it will be necessary to demonstrate that there is no longer a need for holiday accommodation in a specific location. Reference to low-cost staff accommodation should also be removed

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Full name: Callum Robinson

Organisation (where relevant): Laister Planning Limited

Other party name (if relevant): ELL Holdco Limited

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

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

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: These representations have been prepared on behalf of ELL Holdco Limited, the owners of Hornbeam Country Park, Dunkeswell, Honiton, EX14 4XW in response to East Devon District Council's (EDDC) emerging East Devon Local Plan 2020 to 2042 Second Regulation 19 Publication Draft November 2025 which runs until 26 January 2026.

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

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Full name: Callum Robinson

Organisation (where relevant): Laister Planning Limited

Other party name (if relevant): ELL Holdco Limited

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

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

1(c). If the comment is related to a site, please state the site reference here.: No

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.: Policy SE10 is in conflict with the NPPF - Please refer to the attached document 'Reps to East Devon District Plan Reg 19'

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached document 'Reps to East Devon District Plan Reg 19'

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to the attached document 'Reps to East Devon District Plan Reg 19'

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will

make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached document 'Reps to East Devon District Plan Reg 19'

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.: .

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have the opportunity to further represent the contents of the attached document 'Reps to East Devon District Plan Reg 19'

Full name: Margaret Leppard

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

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