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# East Devon Local Plan 2020-2042: Second Regulation 19 Publication Draft

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Prepared by Savills  
on behalf of Sidbury LVA LLP

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# 1. Introduction

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This Representation is made in response to the Second Regulation 19 Publication Draft of the East Devon Local Plan Review 2020-2042. The representation is submitted by Savills on behalf of Sidbury LVA LLP (LVA) who have an interest in Land South of Furzehill, Sidbury, known as 'SIDM\_34' in the Draft Plan.

The Land South of Furzehill, Sidbury ('the site') has been promoted at the various stages of the emerging Local Plan, as well as previously through the current adopted Local Plan and the now made Sid Valley Neighbourhood Plan. A significant amount of work has been undertaken relating to the site leading to the submission of an outline planning application in November 2024 (ref: 24/2434/MOUT).

The merits of the site and the now supporting information for the outline planning application support the case that the site remains a very strong candidate for allocation in the emerging Local Plan Review.

Our comments on the consultation and supporting evidence base are set out below and are made in accordance with paragraph 36 of the NPPF, to assist in ensuring that the Local Plan is found sound when examined in the future.

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## 2. Response to Draft Policies

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The following section sets out our responses to the draft policies within the Draft Plan.

### Strategic Policy SP01: Spatial Strategy

We note that the proposed spatial strategy is predominantly unchanged from that set out in the first Regulation 19 consultation draft, with the exception of the inclusion of the specific name for the proposed new community of Marlcombe.

We therefore continue to be supportive of the proposed spatial strategy in broad terms, and agree that there is a need to focus the spatial strategy on development at the most sustainable settlements in the district.

However, as set out in our comments to draft policy SP02, we continue to consider that the most sustainable villages are capable of playing a significant role within the spatial strategy, and indeed may need to play a more significant role given the likely need for the authority to revisit the proposed housing requirement and with it the need for an increase in the number of allocations.

Linked to this, we continue to maintain that reference within the Draft Plan to an allowance for only 'limited development to meet local needs at the Service Villages' should be carefully considered to ensure that the growth directed to those villages is proportionate. No changes have been made in this respect since our representations to the first Regulation 19 consultation draft. It remains the case that for a number of villages more than simply 'limited' development is already proposed to be directed to those settlements. This is a matter we support. Development at the sustainable towns and villages is important to ensure the delivery of affordable housing for those locally who really need it, as well as supporting local shops and services

We continue to maintain therefore that the authority review the proposed use of the word 'limited' for the service villages, in order to ensure that the important role the villages can play is strengthened within the draft plan.

### Strategic Policy SP02: Levels of Future Housing Development

It is noted that no changes are proposed to draft Strategic Policy SP02 from that published in the first Regulation 19 consultation draft.

Therefore, whilst we do not intentionally wish to repeat previous comments made, given the importance of what we consider to be significant issues with this draft policy which remain, we have outlined again our principal concerns below.

Firstly, in terms of the proposed plan period, this remains as 2020 – 2042. Ordinarily the plan period start date would be brought forward closer to the likely plan adoption date but we note the Council has sought to make reference to supporting evidence dating back to the 2020 start date. However, of greater concern is that the draft plan is unlikely now to be adopted until 2027 at the earliest and that will only be if the Council can, in our view, make changes to ensure the plan is found sound. Even if that is done, we consider that the plan period should be extended to ensure that a 15-year plan period is provided post adoption of the plan. The evidence base will also need to be updated to ensure that it is consistent with the plan period.

Secondly, given the absence of any changes to the proposed housing requirement for the plan period, we continue to have two principal concerns over the approach taken. These are:

- Whether the Local Plan can proceed under the transitional arrangements
- The proposed stepped trajectory

We address each of the two matters in turn below.

*Whether the Local Plan can proceed under the transitional arrangements*

Draft Policy SP02 remains unchanged and therefore continues to propose at least 20,909 dwellings will be delivered between 1 April 2020 and 31 March 2042, with delivery being split into two phases with 850 dwellings per annum in the first phase from 2020/21 to 2031/32 and 1,070 dwellings per annum in the second phase from 2032/33 to 2041/42.

We maintain that it was clear at the beginning of 2025 and continues to be the case given the lack of any additional evidence provided by the Council that the Council commenced consultation on the Plan in early 2025 before the full Regulation 19 draft was ready. We continue to consider that the intention was to try and take advantage of the transitional arrangements contained in Annex 1 of the NPPF, and proceed with a housing requirement that falls below the Government's revised Standard Method output. This intention was very clear when reading how the proposed housing requirement had been described in paragraph 3.11 of the first Regulation 19 draft in early 2025 and the text in the second Regulation 19 draft remains unchanged. The consultation text seeks to justify that the requirement has been set at a level which just, by less than one dwelling per annum, exceeds the 80% threshold in paragraph 234(a) of the NPPF.

This approach is not in accordance with the purpose of the transitional arrangements. These provisions are intended to enable Local Plans to progress where an emerging local plan has advanced but not yet reached the Regulation 19 stage, not to set a minimum threshold for Local Plans for plans which are at Regulation 18 stage. This is unfortunately how the Regulation 19 plan reads.

However, more fundamentally, given the absence of sufficient justification provided by the Council within the latest Housing Delivery Paper (November 2025), we maintain that the draft Local Plan cannot proceed on the basis of the transitional arrangements. The relevant extract from Paragraph 234(a) of the Framework is copied below:

*“234. For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:*

*a. the plan has reached Regulation 19 82 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need 83.”*

This is supported by two related footnotes. The first of these – Footnote 82 – is as follows:

*“Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In this context “reached Regulation 19” refers to when Regulation 19 has been complied with (i.e. when the planning authority has made a copy of each of the proposed submission documents and a statement of the representations procedure available, and the statements required in Regulation 19(b) have been sent to consultation bodies).” (emphasis added)*

We highlight again reference to “*each of the proposed submission documents*” which is very important. In order to be considered to have reached Regulation 19, the whole of the Plan, i.e. each component part of a Regulation 19 local plan, must have been made available. This is a very deliberate piece of drafting by Government intended to preclude circumstances where a local planning authority could progress under the transitional arrangement contrary to their spirit and purpose.

This government intention is unchanged in the latest consultation launched in December 2025 on potential changes to the NPPF. Within that consultation, the published draft NPPF at Annex 1 (paragraph 8) very clearly re-states that “*any other plans being prepared should be produced in accordance with the version of this Framework published in December 2024, unless any of the transitional arrangements in Annex 1 to that Framework apply (in which case those transitional arrangements continue to apply)*”.

This suggests that the direction given in the current NPPF will remain unchanged.

Furthermore, when looking at the latest guidance in the PPG, under the heading “How do the implementation aspects of the NPPF apply to plans where more than one round of Regulation 19 consultation has been undertaken?”, this further highlights the issues with the Council’s approach to the draft plan. Paragraph 86 states:

*Some local planning authorities may undertake more than one round of Regulation 19 consultation on a plan. Where this is the case, for the purposes of implementing Annex 1 of the Framework, a plan is normally to be taken as having reached the Regulation 19 stage at the date on which the first round of Regulation 19 consultation commenced.*

*However, in some limited circumstances, a plan is to be taken as having reached Regulation 19 on the date that a subsequent round of consultation commenced. These limited circumstances could include instances such as when the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage. (underlining our emphasis)*

It is very clear that the plan has changed significantly between the first Regulation 19 consultation and this second consultation. This consultation clearly relates to a significantly different plan. There are, for example, a significant number of track changes in this second Regulation 19 document which highlight the stark differences between the two documents. The Council themselves acknowledge back in early 2025 that the first Regulation 19 consultation would not be the final version and further consultation on the policies relating to the new community would be required. There are now a significant number of changes presented in the latest consultation document relating to the new community which further highlights the changes to the plan as a whole.

On this basis we are concerned that the second Regulation 19 consultation draft has not sought to make changes or provide further justification. We therefore maintain on that basis that there is significant risk that the Local Plan may not be able to proceed under the transitional arrangements and that none of the exceptions contained within paragraph 234 of the Framework apply.

In these circumstances, it is our view that the housing requirement must reflect paragraph 62 of the Framework:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.*

The Standard Method output for East Devon from the revised methodology of the PPG is 1,188 dwellings per annum (dpa) as acknowledged in paragraph 3.11 of the draft Local Plan. For the reasons set out above, it is this figure which the Plan must put in place in order to satisfy the ‘Positively Prepared’ test of soundness in paragraph 36(a) of the NPPF. As it stands, our view is the draft Local Plan is unsound and may require significant Main Modifications to allocate the additional housing required between the total output from the standard method and that proposed in draft Policy SP02. This would be an additional 5,227 dwellings if assuming the standard method output would be 26,136 homes based on the same plan period, against the 20,909 homes proposed within draft Policy SP02.

## *Stepped Housing Trajectory*

We continue to consider that there is no justification for adopting a stepped trajectory in the draft plan that effectively reduces the housing requirement for the five years (approx.) post-adoption and pushes the resultant backlog that this creates to the later years of the plan period.

The Planning Practice Guidance helpfully attends directly to the question of ‘When is a stepped housing requirement appropriate for plan-making?’. In so doing it provide the following guidance:

*“A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.”*

The guidance also advises that evidence must be provided to support a stepped approach if one is proposed. We do not consider that the latest Housing Topic Paper (November 2025) within the supporting evidence base includes sufficient justification for this approach.

Having raised these concerns over the first Regulation 19 consultation draft, the Council does not appear to have made any changes or reacted to this. Rather, it continues to appear that the authority is seeking to do the bare minimum to scrape through under the transitional arrangements, when there was an opportunity in 2025 to start the process of positively and proactively updating the policies and proposals of the Local Plan to reflect the local housing need as defined by the revised Standard Method.

As it stands, the transitional arrangements may not apply to EDDC as not all of the Local Plan has been published for consultation. In accordance with the paragraph 36 of the Framework, the housing requirement and related elements of the Local Plan should therefore be updated to reflect the revised Standard Method.

In our view, the housing requirement for the draft Local Plan should therefore be increased in order to reflect the updated Standard Method.

### Strategic Policy SP03: Housing requirement by Designated Neighbourhood Area

Our comments to draft Policy SP03 are consistent with our comments made to the first Regulation 19 consultation draft. We welcome the fact that Land South of Furzehill, Sidbury (SIDM\_34) is accounted for within the housing requirement figures breakdown. It is clear from the Regulation 19 plan that the site forms part of the proposed local plan allocations figure of 233 dwellings for the Sidmouth area (including Sidford and Sidbury).

However, we continue to have concerns over overall housing requirement within which the designated neighbourhood area figures are derived, as set out in our response to draft Policy SP02 above.

## Strategic Policy SD26: Development allocation at Sidbury & Land South of Furzehill, Sidbury (SIDM\_34)

We continue to fully support Strategic Policy SD26 and specifically the proposed allocation of the Land South of Furzehill, Sidbury (SIDM\_34).

It is noted however that the draft allocation text for the site has changed and now reads:

### *Land South of Furzehill, Sidbury (SIDM\_34)*

*This site, to the south of Sidbury, is allocated for 43 new homes. Development of this site will enable the second phase of the Devon County Council proposed multi-use trail (routes used by a combination of cyclists, pedestrians and by/for other movement), ensuring delivery of the entirety of the route from Sidford to Sidbury. Vehicle access to the site will be via A375. ~~Development would~~ Prior to the occupation of the 10th dwelling, or other timetable that may be expected to play its role in delivering ~~agreed through the determination of the planning application, that~~ part of the Sidbury to Sidmouth cycle route through the allocation should be completed and available for use.*

*In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures will need to be identified and implemented.*

*The site is within the East Devon National Landscape and particular care will development should be informed by detailed assessment and design work to conserve and enhance the natural beauty of the site and its wider landscape setting. It is also located due east of Sidbury Castle, an Iron Age hill fort designated as a Scheduled Monument, the setting of which should be conserved and enhanced. Higher westerly site parts of the site should therefore remain undeveloped and field boundaries should be reinforced with appropriate planting where open space provision may be appropriate. Listed buildings are found to the north and east of the site and the Sidbury Conservation Area also lies to the north; proposals will need to be carefully designed to avoid detrimental impacts on these heritage assets heritage assets, and where possible to secure enhancements. This should include controls on building heights and materials, and the retention of a broad green corridor connecting Furzehill Farm with the wider rural setting.*

We have no objections to the changes proposed to draft allocation SIDM\_34. We recognise that there will be a need to secure the delivery of the component of the second phase of the Sidford to Sidbury multi-use path which would run through the site. Indeed, ensuring this is in place in the early stages of the development is sensible as it will enable the available connections at the outset of the scheme.

In terms of the latest position on the site itself, a comprehensive overview of the land south of Furzehill, Sidbury was provided as part of representations to the previous stages of the Local Plan, and an update was provided as part of representations to the first Regulation 19 consultation draft. Rather than repeat this, the latest position is set out below.

### *Outline Planning Application and Public Consultation*

An outline planning application for the site was submitted in November 2025 (ref: 24/2434/MOUT) and is currently pending determination with East Devon District Council. The proposals are for the development of 43 residential dwellings, and entirely consistent with the emerging allocation in terms of scale and nature.

Indeed, the following aspects of the pending outline planning application demonstrate consistency with the emerging allocation for the site under SIDM\_34:

- the delivery of 43 new homes, comprising 28 market homes and 15 affordable homes for the local community to address the current housing shortfall;
- the delivery of a high quality and sustainable off-road multi-use path linking Hillside and Furzehill - extending the proposed Devon County Council multi-use path, for which the first phase has now received planning permission;
- integration of the development with the existing urban form and surrounding landscape (specifically ensuring that the upper slopes are kept free of development in accordance with the requirements of emerging policy SIDM\_34);
- the delivery of a high-quality residential environment;
- delivery of considerable open space provision, over and above adopted policy requirements;
- net biodiversity gain through the retention and enhancement of existing habitats, and creation of new habitats alongside delivery of a range of ecological mitigation and enhancement measures. Indeed, as demonstrated by the supporting plans the application proposals can provide more than the Government's 10% requirement in Biodiversity Net Gain across habitats, hedgerows and watercourses; and
- a sustainable drainage strategy which will restrict site runoff to the greenfield equivalent rate and provide long-term storage.

The submission of the outline planning application demonstrates the intent of the applicant, Sidbury LVA LLP, to deliver the site in the context of the significant need for housing in the district, as well as delivering the second phase of the multi-use path.

Importantly, the first phase of the multi-use path was approved by Devon County Council on 28 April 2025 (ref: DCC/4404/2024). This is a significant update to the position set out in our previous representations in early 2025 when the application was still pending.

This now further demonstrates the importance and significance of the Land South of Furzehill to enable both the delivery of housing to address local housing needs but also to delivery the second phase of the multi-use path.

The submitted masterplan includes a significant amount of integrated multifunctional green space that is easily accessible for the use and enjoyment of the whole community and makes connections with the wider landscape - including a new pocket park, a community orchard and new hedgerows, wetland and meadow areas to enhance biodiversity.

The development of the site would comprise a natural extension to the existing houses at Furzehill and Hillside, sitting in the lower part of the valley with minimal landscape and visual impact on the wider area, sensitive to the AONB setting. Indeed, the site is physically surrounded by built development to the north, south and east, and is therefore capable of seamless integration with the village and being developed with relatively limited visual impact.

Overall, it is clear from the submitted planning application plans and documents that the pending outline planning application demonstrates intent by Sidbury LVA LLP to bring forward this site now to facilitate new homes and the delivery of the second phase of the multi-use path. It also demonstrates that the pending outline application is entirely consistent with the requirements of the emerging allocation particularly through the number of new homes proposed, the provision of the second phase of the multi-use path and the protection of the upper slopes from built development.

In terms of engagement and joint working with key stakeholders, much of this was set out in our representations to the first Regulation 19 consultation draft. Engagement is ongoing with Devon County Council in relation to the delivery of the second phase of the multi-use path, and how the pending planning application can facilitate that, as well as ongoing engagement in relation to the outline planning application, particularly with officers at East Devon District Council.

In summary, the Land south of Furzehill, Sidbury remains a very good candidate for allocation in the emerging Local Plan Review. As the masterplan for the site and supporting technical work demonstrates, the site is capable of accommodating the 43 new homes proposed in draft Policy SIDM\_34, including a policy compliant level of affordable housing, as well the delivery of the second phase of the Sidford to Sidbury cycle link. Given the lack of local affordable housing delivery and lack of any other feasible options at Sidbury, the Land south of Furzehill is an ideal candidate for allocation in the plan and we will continue to support it through the development of the draft plan.

#### Strategic Policy CC01: Climate Emergency

We note that no changes have been proposed to this draft policy since the first Regulation 19 consultation draft.

The draft policy therefore remains generally vague in its language and it is not at all clear what development is required to achieve in order to accord with the wording of this policy.

We therefore continue to recommend that draft Policy CC01 is changed into introductory text for this chapter rather than policy wording.

#### Strategic Policy CC06: Embodied Carbon

As with draft Policy CC01, we note that no changes have been proposed to this draft policy since the first Regulation 19 consultation draft.

We continue to consider that this draft Policy is neither justified nor consistent with national policy.

Given the Government's position on setting standards at a national level, we do not believe this draft Policy aligns with national policy, nor is the need for it justified. As such, it should be removed in full to achieve soundness.

#### Strategic Policy AR01: Flooding

Whilst a few minor changes have been made to this draft policy since the first Regulation consultation draft, we are concerned that the draft policy remains inconsistent with the provisions of the latest NPPF, notably paragraph 175 which updated the approach to the sequential test. This is copied below for convenience:

*“The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).”*

Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

### Strategic Policy HN02: Affordable housing

We note that this draft policy is broadly unchanged from that consulted on as part of the first regulation 19 consultation draft. We therefore remain in general support of the proposed 30% affordable housing requirement for “all other local plan allocated sites”.

We consider this proportion of affordable housing more reflective of both local housing needs as well as the need to ensure new developments are viable. In this respect, we consider the emerging policy position on affordable housing as more realistic than that of the adopted Local Plan.

We do however encourage the Council to ensure that the supporting evidence base is robust and supports the proposed affordable tenure splits.

### Policy HN05: Self-build and custom build housing

Whilst a few minor changes have been made to this draft policy since the first Regulation consultation draft, we continue to consider the draft Policy is not sound.

Whilst we still support the Council’s efforts to deliver a diversified range of housing as part of the plan, there is no justification provided for the requirement of 5% on sites of 20 dwellings or more. Justification should consider absolute need moving forward, but also take into account consented supply as well as realistic levels of demand for self-build plot purchase within larger “host” development sites.

At a practical level, there remains a fundamental conflict between the characteristics that typically attract demand from custom / self-build purchasers and trying to accommodate such plots on a wider “host” development site:

- With the need for at least some design continuity between the “host” site and the self/custom build plots, this takes away the freedom within the self-build plots.
- That being the case, the developer would be able to achieve economies of scale and deliver the same product at a lower price than it would cost a self-builder to achieve a building of the same floorspace.
- Unless a self-build site can have its own separate access (which in most cases is unachievable and unviable), the contracting associated with multiple self-build units, on top of any contractors associated to the “host” site is a significant health and safety challenge.

Our position is that if there is demonstrable and viable demand for self and custom built plots, the delivery of these would be more appropriate on sites specifically allocated for self-build (i.e. not part of larger host developments), or on sites where an element of self/custom build is expressly supported by the land owner.

Given the extensive nature of the comments, we do not propose specific wording changes and urge the Council to consider substantive changes to this draft Policy prior to submission.

### Strategic Policy DS02: Housing density and efficient use of land

We acknowledge that the Council has responded to an extent with some changes proposed to draft Policy DS02 in this further Regulation 19 consultation. In our previous response we highlighted our concerns over the blanket approach taken in requiring all major developments to be supported by a design code.

However, we remain concerned that the draft policy not only requires a design code for developments of over 50 homes but also those sites within or adjacent to a National Landscape. Whilst we acknowledge that National Landscapes have a higher sensitivity, our view is that the policy should be consistent in terms of the site size threshold and should not seek to introduce an additional threshold within the policy for all sites within National Landscapes. This for example could result in the need for small sites within the National Landscape to require a design code which is likely to be disproportionate given the size and nature of those sites. There is also no reflection within the draft policy over whether some of those sites could come forward as outline planning applications rather than detailed planning applications. Design codes are clearly much more relevant to the latter than the former.

In our view, the draft policy should be updated to include the 50 dwelling threshold now introduced, but remove the additional reference to the requirement for design codes in National Landscapes.

#### Strategic Policy TR02: Protecting transport sites and routes

We note that this draft policy is broadly unchanged from that consulted on as part of the first regulation 19 consultation draft. We therefore remain in general support specifically the Sidford to Sidbury Strategic cycle network schemes. We agree that the delivery of this route is critical in developing infrastructure to widen transport choice in the local area.

We reiterate again however that in order to ensure this critical infrastructure is delivered it is vital that new development is supported in order to aid the delivery of such infrastructure. It is clear for example that for the entirety of the Sidford to Sidbury route to be delivered this will require the delivery of the Land South of Furzehill, Sidbury (SIDM\_34). Indeed, draft Policy SIDM\_34 reflects this by stating “*development of this site will enable the second phase of the Devon County Council proposed multi-use trail*”. The pending outline planning application for the site (ref: 24/2434/MOUT) also includes the provision of the second phase of the multi-use path and is therefore consistent with the aspirations of both draft policies TR02 and SIDM\_34.

It is therefore clear that the delivery of the two go hand in hand, so it therefore follows that both should be supported as part of the draft local plan.

#### Strategic Policy OL10: Development on high quality agricultural land

We note that no changes have been proposed to this draft policy since the first Regulation 19 consultation draft, and we therefore continue to object to the inclusion of this policy on the basis of a complete lack of justification.

We explained our reasons for the objection in our representations to the first Regulation 19 consultation draft and these points still stand. We maintain that the draft policy should be removed in its entirety.

#### Strategic Policy PB05: Biodiversity Net Gain

We note that no substantive changes have been proposed to this draft policy since the first Regulation 19 consultation draft, and we therefore continue to object to this policy as currently worded.

Most importantly, the draft policy continues to include the requirement for major development to deliver at least 20% BNG.

As set out in our previous representations, the PPG is very clear that there is no need for local planning policy to repeat national BNG requirements, and that local plans “*should not seek a higher percentage than the statutory*

*objective of ten per cent biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified”.*

*It adds: “to justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.”*

As a result of the above, the Council must revisit this draft Policy prior to the submission of the draft plan.

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### 3. Summary and Conclusions

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This Representation is made, on behalf of Sidbury LVA LLP, in response to the Regulation 19 Publication Draft of the East Devon Local Plan Review 2020-2042.

Overall, we fully support the inclusion of the Land South of Furzehill, Sidbury, known as 'SIDM\_34', in the Regulation 19 plan.

The site remains a strong candidate for allocation in the emerging Local Plan Review. The site is available and very much capable of accommodating the 43 new homes proposed in draft Policy SIDM\_34, including a policy compliant level of affordable housing.

However, we have reiterated our significant concerns with the approach in the draft plan to over the proposed housing requirement and whether the plan can even proceed under the transitional arrangements set out in the NPPF.

Our concerns relate to both the proposed stepped trajectory, which we consider is not supported by any evidence or justification, and the proposed housing requirement which in our view should be increased in order to reflect the updated Standard Method.

We hope that these comments will be helpful to inform the submission version of the Local Plan, but would be very happy to assist further with any queries relating to SIDM\_34, particularly any discussions relating to the proposed allocation text and requirements.

