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

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1.1

Full name: Devon Wildlife Trust

Organisation (where relevant): Devon Wildlife Trust

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction chapter is not sound. Please be as precise as possible.: Thank you for the

opportunity to comment on the Second Regulation 19 Publication Draft of the East Devon Local Plan. We confine our comments to those relating to nature and environment. Thank you for updating the Plan to reflect a number of the comments we submitted on 24 March 2025. These changes have strengthened the Local Plan and improved its overall clarity and effectiveness. However, it is disappointing to note that many of our previous comments have not been addressed in the current iteration of the Plan. As a wildlife-focused charity, the protection and enhancement of biodiversity is central to our work and expertise. The recommendations provided in our comments are evidence-based and directly aligned with biodiversity recovery, climate resilience and best practice in landscape planning. If included in the final iteration, they would substantially strengthen the Local Plan and significantly improve its ability to deliver meaningful and long-lasting environmental benefits. We therefore strongly urge the Council to give due consideration to our comments and to incorporate these recommendations into the Plan. Comments provided as part of our response to the first Regulation 19 Publication Draft are included in Appendix A. A significant proportion of our comments relate to the absence of a requirement for enhancement, in addition to protection, of the natural environment. The National Planning Policy Framework (NPPF) provides a clear statement that planning policies and decisions should ‘contribute to and enhance the natural and local environment’. For the majority of planning applications, enhancement of biodiversity is simple and inexpensive. We strongly urge the Council to include the requirement for enhancement throughout its Local Plan. This would make a meaningful and lasting positive difference to both the people and wildlife of East Devon. Native Species The Local Plan currently contains only a single reference

to the use of native species, relating to a hedgerow planted in association with the site allocated for development at ‘Land opposite the Village Hall’. This isolated and site-specific reference does not represent a coherent or adequate approach to landscape planting, biodiversity recovery or climate resilience. We would strongly welcome a clear policy commitment within the Local Plan to require the use of native and locally appropriate species for all landscape planting associated with new development. Wherever possible, these species should be locally sourced, from Devon and preferably East Devon, to ensure genetic suitability, improved establishment rates and long-term ecological resilience. To enable this, the Plan should also support the development of local tree nurseries and seed hubs. The Devon Nature Recovery Network (NRN) Habitat Suitability Mapping provides a high level of spatial and ecological detail and offers a robust evidence base for the creation of appropriate, site-specific species mixes. Embedding these commitments within the Local Plan would ensure that landscape planting contributes effectively to biodiversity recovery, climate adaptation and the delivery of a genuinely sustainable and resilient development strategy. Photographs Photos which are utilised throughout the document are an opportunity to demonstrate good practice. Relatively few pictures are utilised in the document and a number of these do not send the right message. Photographs should aim to show good integration of semi-natural habitats into developments, with a diversity of habitats included. Habitats such as woodland, wetlands and heathlands are part of the wider East Devon landscape and should be fully integrated within developments, providing space for wildlife, adding interest and place-making to developments, providing engagement and wellbeing opportunities with local communities and providing other ecosystems services. It would be good to start this process by including the right messaging within this document.

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: General Use of ‘significant’ and ‘substantial’ in policies. These terms need to be defined with specific criteria, which must recognise the differences in impact/effect in different locations, such as between towns and villages. Difficulty in interpretation. How the Council ensures that the necessary infrastructure requirements and services are provided before new homes are occupied is a serious concern, especially during times of cut backs in services and continued economic decline.

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: Given the problems of planning for future growth in a District with limited land that is outside the National Landscapes, this is a well-considered and comprehensive set of documents, maps and evidence for policies on future development. The vision and set of objectives seems appropriate, with climate emergency being to the fore, but the biodiversity crisis should also be recognised as of equally importance. Objective 10 – securing infrastructure to support new development is a vital component of the Plan.

3. Do you consider that this part of the Introduction chapter is sound?: Yes

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

Full name: Hilary Johnson

Organisation (where relevant): Dorset Council

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

3. Do you consider that this part of the Introduction chapter is sound?: Yes

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

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

Thank you for the opportunity to comment on the East Devon Local Plan Second Regulation 19 Publication Draft (November 2025) and supporting Statements of Common Ground (CD01a, b, c & d). We understand that, in accordance with Annex 1 of the December 2024 National Planning Policy Framework (NPPF), the East Devon Local Plan is progressing under the December 2023 NPPF, having reached Regulation 19 stage in February 2025. Under these transitional arrangements, the plan is required to provide for at least 80% of the standard method local housing need. Based on a standard method figure of 1,146 dwellings per annum, this equates to a minimum requirement of 950.4 dwellings per annum. Over the 22 year plan period, this results in a minimum housing provision of 20,908 net additional dwellings. This position is outlined in Strategic Matter H01 and can generally be supported. The justification to Strategic Policy SP02 notes there is a modest surplus in the projected supply which is described in the emerging plan as a 'healthy headroom surplus of 12.18% that will account for any possible non-delivery'. To deliver the homes Appendix 1 sets out a stepped housing trajectory increasing from 850 homes per year in the early part of the plan period (2020/21 to 2031/32) to 1,070 homes per year in the later part of the plan (2032/33 to 2041/42). It is understood that this stepped rate reflects the time it takes for allocated sites to start to deliver new homes especially given the size of some of the allocations in East Devon. Work on the Dorset Council Local Plan began in 2019, with options consultations in 2021 and August 2025. Dorset Council intends to publish a Regulation

19 plan in August 2026 and submit it for examination in December 2026 under the current plan making system. In its response to the first East Devon Regulation 19 consultation, Dorset Council stated that it could not confirm whether Dorset would have an unmet housing need. This remains our position until further work is completed on the analysis of the August 2025 consultation responses and further evidence gathering. We therefore welcome the additional text within Strategic Matter H02 added to paragraph 3.8 of the plan confirming that the plan will be reviewed in accordance with national policy should housing delivery or identified needs, including unmet needs from adjacent authorities, change in the future. The East Devon–Dorset boundary is predominantly rural and largely within National Landscape designations. Lyme Regis lies at the county boundary and forms a contiguous urban area with Uplyme. Together the two settlements have a combined population of around 5,000, which is greater than many Tier 3 Local Centres. In the Regulation 19 plan, Uplyme is identified as a Tier 4 service village, with a settlement boundary enlarged from the existing boundary to allow limited additional growth. Dorset Council has acknowledged within Strategic Matter H02 that development opportunities within Dorset are constrained but continue to request that Uplyme be considered as a local centre to help meet needs arising in the immediate area, including Lyme Regis, particularly for affordable housing. In relation to Gypsy and Traveller provision, Strategic Matter H03 describes a joint approach to pitch provision with Exeter, Mid Devon and Teignbridge. Paragraph 6.5 seeks agreement that there are no cross boundary issues in respect of Gypsy and Traveller and Travelling Showpeople provision, a position with which Dorset Council agrees. With regard to employment, Strategic Matter E01 explains the Plan’s approach to meeting East Devon’s employment needs, and paragraph 7.13 confirms that East Devon is providing for its own employment requirement; this position is also agreed by Dorset Council. Strategic Matter C01 addresses climate change, noting that East Devon District Council, Devon County Council and neighbouring authorities, including Dorset Council, have all declared a climate emergency and adopted strategies to respond to this issue. Paragraph 4.7 records that there are no areas of disagreement. Dorset Council agrees with this position and is keen to continue working collaboratively with East Devon to mitigate climate change impacts. Dorset Council supports the approach in Strategic Policy PB04 requiring development within the River Axe SAC catchment to demonstrate nutrient neutrality using the Natural England nutrient calculator. This is consistent with Dorset Council’s approach. However, the Plan does not reference East Devon District Council’s £4.09m Local Nutrient Mitigation Fund (LNMF) award or articulate how delivery of mitigation through this funding will support housing delivery. Dorset Council wish to suggest that the supporting text includes more positive references to joint working and investment of LNMF funding to secure mitigation and enable development within the River Axe catchment. Strategic Matter W01 appropriately records shared concerns regarding water quality in the River Axe SAC but is framed largely in negative terms. Dorset Council wish to suggest amendments to include more positive references

to proactive joint working and delivery of mitigation, particularly reflecting the investment of LNMF funding, to support housing supply and delivery within the River Axe catchment. Part A of Strategic Policy AR02 appears restrictive where impacts on water quality arise from constrained wastewater and water supply infrastructure that is outside developer control. While this is noted, Dorset Council does not consider it necessary to comment formally on this policy. The Statement of Common Ground on Transport CSD-010d describes the Strategic Road Network in East Devon, identifying the M5, A30, A303 and A35, with the latter providing the main connection towards Dorset. Dorset is not referenced further in the Plan's transport section. However, Dorset Council's Transport Planning Team has previously indicated its support for continued joint working with East Devon, particularly in relation to improving cross boundary bus services, including links between Bridport and Axminster railway station. Dorset Council has also welcomed collaboration to ensure that routes identified in East Devon's Local Cycling and Walking Infrastructure Plan (LCWIP) that cross into Dorset are aligned with those identified in Dorset's Active Travel Infrastructure Plan (ATIP). We welcome further opportunities to continue the dialogue as our local plans progress towards examination.

Full name: Planning Policy Team

Organisation (where relevant): Somerset Council

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

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

8. The Draft Statement of Compliance CSD-010a identifies housing – issues H01-H03, Employment - Issue E01, Climate Change – Issue C01 and Water Quality – Issue W01 as being strategic cross boundary issues with Somerset. It is agreed that these are relevant issues for cooperation.

9. Statements of Common Ground (SoCG) on Housing, Employment and Site Allocations, Environment and Infrastructure and Transport have been produced (CSD-010b-d). Signatures have not been sought at this stage, but the documents confirm that Somerset Council will be invited to sign the Housing, Employment and Site Allocations and the Environment and Infrastructure SoCGs at the Submission stage of the plan-making process. Somerset Council confirms that it looks forward to receiving the final versions of the relevant SoCGs for review and signing and that it will continue to engage with East Devon Council on strategic cross-boundary issues. 10. Paragraph 5.17 of CSD – 010b states the following: It is agreed between East Devon, Dorset, Somerset, Mid Devon, Exeter, Teignbridge and Torbay that, any consideration of meeting the housing requirements of other LPA's should be informed by a joint objective assessment, to an agreed and defined methodology, that runs across local authority boundaries to assess suitability for development of potential housing developments sites. It is suggested that this may require amendment given that Somerset and Dorset are now part of the Wessex Partnership. 11. East Devon will be aware that the statutory Duty to Cooperate (DtC) was abolished in primary legislation under the Levelling Up and Regeneration Act 2023, which gained Royal Assent in October 2023. The Act removes the obligation for

local planning authorities to formally collaborate on strategic planning matters during local plan preparation and replaces it with a new "flexible alignment" requirement. However, these provisions have not taken effect yet and not in force until enabling regulations are published. The government has not yet specified a timetable for bringing those regulations into effect. 16 January 2026 General 12. Somerset Council confirms that it raises no issues regarding the soundness of the East Devon Local Plan 2020 to 2042.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Waddeton Park Ltd

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Bell Cornwell LLP on behalf of Waddeton Park LTD

Waddeton Park Ltd is a very well-established and successful local housing land promoter and investor with considerable interests across the district. Waddeton Park Ltd has helped to facilitate new homes, affordable housing and other uses in the area. Specifically, Waddeton Park Ltd has interests in land at London Road, adjacent to the Cranbrook built-up area boundary, which is suitable and available for residential development. We attach a plan that shows this land (please refer to the Location Plan produced by Clifton Emery Design) Given the nature of their long-standing interests across the district, Waddeton Park Ltd is an important local stakeholder and is interested in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP made comments on Waddeton Park Ltd's behalf on the first Regulation 19 Consultation Draft of the East Devon Local Plan (2020 -2042) in March 2025. Comments were made on the following draft policies:

- SP01: Spatial Strategy
- SP02: Levels of Future Housing Development
- Chapter 4: Development at the West End
- WS09: Clyst Valley Regional Park
- HN02: Affordable Housing
- OL05: Green Wedges

- PB05: Biodiversity Net Gain Bell Cornwell LLP has now reviewed the Second Regulation 19 Consultation Draft of the East Devon Local Plan. It is noted from the consultation website that comments are being sought on changes to the draft plan only and that comments submitted previously do not need to be made again—they will be provided to the inspector for review. All comments made on the first Regulation 19 draft on behalf of Waddeton Park Ltd still stand. Comments on the Second Regulation 19 draft focus on the policy for the proposed new settlement – Strategic Policy WS01 – which was not included in the previous draft.

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 explain the merits of allocating land to the south of London Road, adjacent to Cranbrook, for residential development.

Full name: Dan Trundle

Organisation (where relevant): Black Box planning

Other party name (if relevant): Greendale Group (FWS Carter & Sons Ltd) and Crealy Farms

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Evidence Furthermore, as evidenced in our earlier representation, the full evidence base had still not been published at and beyond the 12th March 2025. Within the evidence base published on the Council website, various references were made at the time to missing documentation:

- HOU-015 “Additional document to follow consultation”
- CCF-001 Water Cycle Study “to follow”
- HCO-004 Playing Pitch Strategy “to follow soon”
- HCO-005 Open Space Strategy “potential study that may be produced”
- HRD-004 East Devon Heritage Strategy (2024-2042) “to follow consultation”

3.12 Even at the time of the Second Consultation, the full evidence base remains unavailable as the following remains on the Council website:

- HCO-004 - Playing Pitch Strategy - external consultants are undertaking this work and the strategy is in production

3.13 Clearly, the Council considers these documents to be entirely relevant to the preparation of the plan, being listed on the Council’s own published evidence and examination library.

3.14 Additionally, the draft Policies WS01 and WS02 published during the First Consultation acknowledged that critical evidence base documents such as an Infrastructure Delivery Plan for the Second New Community and a viability assessment

had not yet been commissioned. For example, it had no idea how much affordable housing could viably be delivered. This is a serious failing.

3.15 Furthermore, various evidence base documents were published following the start of the First Consultation, meaning that the full six-week period was not available to representors with the benefit of the full local plan and comprehensive evidence base. A request was made in writing by Greenhayes for an extension to the consultation in order to ensure the full six-week period was available to representors, however this was declined. This in itself is contrary to the Regulations. Please refer to evidence attached at Appendix 5.

Full name: Danielle Halford

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction chapter, please use this box to set out your comments.: Transitional Arrangements

1.5 For the second stage of EDDC's Regulation 19 Consultation, it is understood that EDDC are still seeking to benefit from the NPPF Transitional Arrangement as set out within Annex 1 of the NPPF. As such, it is still therefore expected that this Draft LP will be examined under the

provisions of the 2023 NPPF. On this basis, these representations reference the soundness of this Draft LP against the requirements set out within the NPPF (2023).

1.6 It is noted that the NPPF states those local plans that reach Regulation 19 (pre-submission stage) on or before 12 March 2025 and whose draft housing requirement meets less than 80% of local housing need should proceed to examination within a maximum of 18 months from 12 December 2024, or 24 months of that date if the plan has to return to the Regulation 18 stage.

Full name: Phillippa Gatehouse

Organisation (where relevant): C G Fry & Son Ltd

Other party name (if relevant): Mr & Mrs Cowling

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction

chapter is not sound. Please be as precise as possible.: C G Fry & Son welcome the opportunity to respond to the East Devon Local Plan 2020-2040 Second Regulation 19 Publication Draft, recognising the importance of a genuinely led system to provide a positive vision for the future of each area. C G Fry & Son Ltd (C G Fry) are working in partnership with the landowners Mr & Mrs *** Personal details have been removed *** of two sites in Hawchurch (HAWK-01 and HAWK-02). Mr & Mrs *** Personal details have been removed *** have been residents of Hawchurch for over 60 years and are vested in ensuring the future vitality of the village including the key assets within it such as the primary school, village pub, village hall, church and the village shop which they have granted a 20 year lease for on their land at HAWK-01 (Norton Store). C G Fry are a regional housebuilder based in West Dorset and operating across the southwest from Cornwall to Hampshire. The Company is in the ownership and control of the Managing Director, *** Personal details have been removed ***, and employs around 200 people across many disciplines from site operatives to professional design, surveying, planning and project management staff. Craftsmanship and quality have always been the hallmarks of our work, earning the Company an enviable reputation. The emphasis is on high quality design and materials, with a finish that can only be achieved by craftsmen working in the traditional way, with the sort of attention to detail which sets our work apart. Our aim at C G Fry is to work in partnership with our landowners and key stakeholders to create developments that everyone involved with can be proud of leaving behind. This representation responds only to amendments to the ‘original plan’ and should be read in conjunction with our representation submitted in March 2025 in response to the first regulation 19 local plan consultation [Appendix A]. Policy Context

C G Fry & Son reiterates their support for the aspirations of the plan to raise standards and deliver high quality development and good design and the need to assess and mitigate the impacts of development, subject to the following caveats:

- All proposed local policies must meet the NPPF tests of soundness by being Positively Prepared, Justified, Effective, and Consistent with National Policy.
- Potential impacts on viability and deliverability must be properly understood.
- Policies should not seek to unnecessarily replicate the NPPF or Building Regs (or other regulatory regimes).
- Policies should not be drafted in such a way that they hinder or discourage development.
- Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations. Consultation Draft NPPF (December 2025)

It is acknowledged that the 2nd Reg 19 draft LP will be examined against the provisions of the NPPF December 2023. However, the direction of travel of the current draft NPPF is material insofar as the national DM policies contained in the consultation draft NPPF will prevail if there is a conflict with Local Plan policies. There seems little point in finding local plan policies sound that we already know will ultimately attract only limited weight in the planning balance if/when the new NPPF is published – which is likely to be before the examination of this plan. A prime example of this is the proposed blanket 20% BNG requirement on all sites, as set out in Strategic Policy PB05: Biodiversity Net Gain (BNG).

Full name: Simon Coles

Organisation (where relevant): Carney Sweeney

Other party name (if relevant): DABB Partnership

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Consultation Draft NPPF (December 2025) It is acknowledged that the 2nd Reg 19 draft LP will be examined against the provisions of the NPPF December 2023. However, the direction of travel is material insofar as the national Development Management policies contained in the December 2025 draft NPPF will prevail if there is a conflict with Local Plan policies. There seems little point in finding local plan policies sound that we already know will ultimately attract only limited weight in the planning balance if/when the new NPPF is published – which is likely to be before the examination of this plan. A prime example of this is the proposed blanket 20% BNG requirement on all sites, as set out in Strategic Policy PB05: Biodiversity net gain (BNG).

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: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kislingbury for L Askew, S Askew, K Askew

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: On the whole, our client is supportive of the direction of the draft Local Plan. However, it is important that the emerging policy requirements do not constrain growth and looks to support the delivery of new development.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction chapter, please use this box to set out your comments.: The evidence base

9.1 As has been demonstrated in the previous sections of this representation, the Cherwell Group are generally supportive of the emerging Local Plan, including the proposed second new community. However, they do have a number of concerns relating to the evidence base underpinning the Plan. Their main concerns primarily relate to: (1) the IDP (Document KSD-001) and the 'East Devon – Options Appraisal for a potential New Settlement' Report (Document NWC-001). However, they also have more minor concerns in relation to the Housing and Economic Land Availability Assessment (HELAA). These concerns are outlined in turn below. ID P- DO CU ME NT K S D- 00 1

9.2 The Cherwell Group note that the IDP (ref: KSD-001(rev)) identifies a number of projects associated with the Marlcombe new community, the West End and the District as a whole. In some instances, the cost of these projects is undefined in the assessment work.

9.3 In order to accord with para. 34 of the NPPF, which requires that plans set out the contributions expected from development, including in relation to affordable housing and infrastructure, there will be a need for these items of infrastructure to be fully costed. This would allow, as is required by the NPPF, for an assessment of whether such contributions will undermine the deliverability of the plan and therefore its effectiveness.

9.4 In addition, there are a number of items of infrastructure that are referred to in Strategic Policy WS01 as being listed in the IDP, which are not. These include community energy/heating provision, on-site renewable energy generation and drainage and sustainable drainage systems.

9.5 Moreover, there are items contained within the IDP that are Marcombe related projects, which have not been identified in emerging Strategic Policy WS01. These include: ? a fifth primary school (Project EDU-13); ? community centres (Project COM-5); ? youth, children’s and library facilities (Project COM-8); ? the community builder (Project COM-10); ? SANGS delivery and enhancement maintenance contribution in perpetuity (Project ENV-3); ? on-site tennis courts, other courts, greens, tracks and trails (Project REC-6); ? the new sewerage treatment works (Project UTI-6).

9.6 These inconsistencies between Strategic Policy WS01 and Document KSD-001(rev) should be remedied so as to ensure that the new community is effective. EA ST D EVO N – O P T I O N S A P P R A I S A L F O R A P O T E N T I A L N E W S E T T L E M E N T R E P O R T – D O C U M E N T N W C - 0 0 1

9.7 The Cherwell Group’s comments regarding Document NWC-001 to the First Regulation 19 consultation remain relevant. H O U S I N G A N D E C O N O M I C L A N D A V A I L A B I L I T Y A S S E S S M E N T

9.8 The Cherwell Group’s comments regarding Document HOU-003 to the First Regulation 19 consultation remain relevant.

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): Place Land Limited

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: See attached representations.

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: See attached representations.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: See attached representations.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

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 explain to the Inspector the reasons why the Local Plan should be examined against the 2023 version of the NPPF.

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): Place Land Limited

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: At page 5 of the Local Plan it states that the local plan has reached the Regulation 19 stage and this forms the second planned phase of Regulation 19 consultation which introduces “limited new material to the plan”. It refers to the transitional arrangements in the National Planning Policy Framework (December 2024) which allows Local Plans which reach Regulation 19 stage by 12 March 2025 to be examined against the NPPF (December 2023). Accordingly, the Council has prepared the plan in accordance with the 2023 version of the NPPF. At the time of publication of the first Regulation 19 plan, the transitional arrangements within NPPF December 2024 at paragraph 234 applied. This states that to have reached Regulation 19 the planning authority must have made a copy of each of the proposed submission documents available and sent to consultation bodies (footnote 82). Due to the phased consultation on the Regulation 19 Plan, the Council did not comply with paragraph 234. The National Planning Policy Guidance (paragraph 86, Reference ID:61-086-20250616) was updated on 26 June 2025. It advises that in cases where LPAs undertake more than one round of Regulation 19 consultation on a plan, for the purposes of the transitional arrangements in Annex 1, a plan is normally to be taken as reaching Regulation 19 stage at the date on which the first round of Regulation 19 consultation commenced. However, where the content of the emerging plan has changed significantly from the one presented at the initial Regulation 19 stage, the plan should be taken to have reached Regulation 19 stage at the date of the subsequent round of consultation. This second Regulation 19 plan includes substantive and significant changes to its policies, in particular relating to the infrastructure requirements associated with policies SP07, WS01, policy requirements for housing allocations under policies SD01- SD29, comprehensive re-

writing of Policy AR02, PB01 and PB04 and the introduction of new policy requirements for electric vehicle charging under policy TR04. Having regard to the NPPG and Annex 1 of the 2024 NPPF, the plan should be regarded as reaching Regulation 19 stage at this second round of consultation (November 2025) and therefore the plan should be examined against the 2024 NPPF. The Government published a consultation draft NPPF in December 2025. Paragraph 8 of Annex A states that any local plans should be prepared in accordance with the December 2024 NPPF unless any of the transitional arrangements in Annex 1 of that Framework apply. Once again, this points towards the 2024 version of the NPPF as the appropriate Framework against which to examine the East Devon Plan.

3. Do you consider that this part of the Introduction chapter is sound?: The Plan should refer to the 2024 version of the NPPF within the introduction and throughout the plan and the implications of the application of the 2024 NPPF should be taken into full account throughout the plan.

Full name: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Transitional Arrangements and a Second Regulation 19 Plan This is the second Regulation 19 Plan with significant changes from the first Regulation 19 Plan. Government guidance on plan making from 2025, states that a Council cannot carry out two rounds of Regulation 19 plan making (to avoid higher housing numbers, essentially) if the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage. Paragraph: 86 Reference ID:61-086-20250616 Revision date: 26 06 2025PPG. A report to Strategic Planning Committee from 2nd of September 2025 effectively highlighted to Members that responses made to the first Regulation 19 Plan would necessitate major changes to make the Plan “sound” but that the required major changes would take plan making back a stage (to Regulation 18 stage) triggering the need for the Council to meet higher housing numbers.

The result is a second Regulation 19 Plan with significant red markings (i.e. significant changes) covering the text in a failed attempt to camouflage the Plan’s clear deficiencies (DtC, SA and HRA, in particular). Duty to Cooperate and Unmet Needs Allied to this, the Council’s responses (Local Plan Paragraphs 1.14 and 3.8 refer) to the DtC and unmet needs, are wholly unsatisfactory, especially given the drastic and well

documented historic undersupply of housing (especially affordable housing) and employment land in both Exeter and East Devon.

Housing Furthermore, on housing (Paragraph 3.9 refers), the Council's priority, it says, is to "address...housing needs by establishing a clear housing requirement based on the standard method using...ONS" but this is plainly incorrect because it is trying to benefit from transitional arrangements so that it doesn't have to meet the 100% need (presumably). The point being whether the Plan can progress under the transitional arrangements or not, the Council is not attempting to meet its true housing need.

Full name: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: McMurdo Land Planning and Development Ltd on behalf of *** Personal details have been removed ***

We also make the following points, not previously made: Transitional Arrangements and a Second Regulation 19 Plan This is the second Regulation 19 Plan with significant changes from the first Regulation 19 Plan. Government guidance on plan making from 2025, states that a Council cannot carry out two rounds of Regulation 19 plan making (to avoid higher housing numbers, essentially) if the content of an emerging plan has changed significantly from the one presented at the initial Regulation 19 stage.

Paragraph: 86 Reference ID:61-086-20250616 Revision date: 26 06 2025PPG. A report to Strategic Planning Committee from 2nd of September 2025 effectively highlighted to Members that responses made to the first Regulation 19 Plan would necessitate major changes to make the Plan “sound” but that the required major changes would take plan making back a stage (to Regulation 18 stage) triggering the need for the Council to meet higher housing numbers. The result is a second Regulation 19 Plan with significant red markings (i.e. significant changes) covering the text in a failed attempt to camouflage the Plan’s clear deficiencies (DtC, SA and HRA, in particular).

Duty to Cooperate and Unmet Needs Allied to this, the Council’s responses (Local Plan Paragraphs 1.14 and 3.8 refer) to the DtC and unmet needs, are wholly unsatisfactory,

especially given the drastic and well documented historic undersupply of housing (especially affordable housing) and employment land in both Exeter and East Devon.

Housing Furthermore, on housing (Paragraph 3.9 refers), the Council's priority, it says, is to "address...housing needs by establishing a clear housing requirement based on the standard method using...ONS" but this is plainly incorrect because it is trying to benefit from transitional arrangements so that it doesn't have to meet the 100% need (presumably). The point being whether the Plan can progress under the transitional arrangements or not, the Council is not attempting to meet its true housing need.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Andrew and Philip Cork

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction

chapter is not sound. Please be as precise as possible.: We maintain our overriding view that in order to meet the significant housing challenges faced in East Devon a step change in approach is required to provide greater balance towards identifying sufficient sites to meet identified needs. In order to do this there is a need to be more proportionate and pragmatic towards designations and policy requirements. Otherwise, the Plan will fail to demonstrate that it is based on an effective strategy underpinned by clear evidence, does not seek to appropriately meet identified needs and will limit the opportunity to deliver sustainable development.

We have focussed our responses on the revisions included within the Part 2 Regulation 19 version of the Plan as requested, but maintain all of our concerns previously raised against the Plan.

For ease of reference the following representation forms are submitted as our response to this Part 2 consultation [see separate entries]:

- Policies SP01 & SP02 (Spatial Strategy and Future Housing Level)
- Policy WS01 (Development of Marlcombe)
- Policy SD03 (Honiton and its Development Allocations)

It is important to emphasise that these representations must be considered alongside our previous representations to the earlier stages of the Emerging Local Plan and the original Regulation 19 consultation version.

In a number of cases no further significant changes have been made to the Plan and its policies to either remove our previous objections or require us to add further to our previous comments. Therefore, the concerns raised at Regulation 18 and the original Regulation 19 consultation in respect of those matters remain despite not making further representations on them at this current stage. For completeness, the Council and Inspector should therefore also refer to our previous representations made on the following policy matters:

- Policy SP01 (Spatial Strategy)
- Policy SP02 (Levels of Future Housing Development)
- Policy WS01 (Development of a second new community)
- Policy SD03 (Honiton and its Development Allocations)
- Policy CC01 (Climate Emergency)
- Policy CC02 (Net-zero Development)
- Policy CC05 (Heat Networks)
- Policy CC06 (Embodied Carbon)
- Policy AR01 (Flooding)
- Policy HN02 (Affordable Housing)
- Policy HN03 (Housing to meet the needs of Older People)
- Policy HN05 (Self Build)
- Policy DS02 (Housing Density and Efficient use of Land)
- Policy OL04 (Areas of Strategic Visual Importance)
- Policy PB05 (Biodiversity Net Gain)
- Policy PB09 (Monitoring Requirements for New Planting Schemes)

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.: Given the current and previous representations made on the Emerging Local Plan on behalf of our clients, we have confirmed that we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Andrew and Philip Cork

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: We maintain our overriding view that in order to meet the significant housing challenges faced in East Devon a step change in approach is required to provide greater balance towards identifying sufficient sites to meet identified needs. In order to do this there is a need to be more proportionate and pragmatic towards designations and policy requirements. Otherwise, the Plan will fail to demonstrate that it is based on an effective strategy underpinned by clear evidence, does not seek to appropriately meet identified needs and will limit the opportunity to deliver sustainable development.

See entries for representations submitted at first Regulation 19 consultation on:

- Policy SP01 (Spatial Strategy)
- Policy SP02 (Levels of Future Housing Development)
- Policy WS01 (Development of a second new community)
- Policy WS09 (Clyst Valley Regional Park)
- Policy WS10 (Development next to M5 and north of Topsham)
- Policy SD01 (Exmouth and its Development Allocations)
- Policy CC01 (Climate Emergency)
- Policy CC02 (Net-zero Development)

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- Policy CC05 (Heat Networks)
- Policy CC06 (Embodied Carbon)
- Policy AR01 (Flooding)
- Policy AR02 (Water Efficiency)
- Policy HN02 (Affordable Housing)
- Policy HN03 (Housing to meet the needs of Older People)
- Policy HN05 (Self Build)
- Policy DS02 (Housing Density and Efficient use of Land)
- Policy OL03 (Coastal Preservation Areas)
- Policy OL04 (Areas of Strategic Visual Importance)
- Policy PB05 (Biodiversity Net Gain)
- Policy PB09 (Monitoring Requirements for New Planting Schemes)

We have focussed our responses on the revisions included within the Part 2 Regulation 19 version of the Plan as requested, but maintain all of our concerns previously raised against the Plan. For ease of reference the following representation forms are submitted as our response to this Part 2 consultation:

- Policies SP01 & SP02 (Spatial Strategy and Future Housing Level)
- Policy WS01 (Development of Marlcombe)
- Policy WS10 (Development next to M5 and north of Topsham)
- Policy SD01 (Exmouth and its Development Allocations)
- Policy AR02 (Water Quality and Efficiency)
- Policy OL03 (Coastal Preservation Areas)

It is important to emphasise that these representations must be considered alongside our previous representations to the earlier stages of the Emerging Local Plan and the original Regulation 19 consultation version. In a number of cases no further significant changes have been made to the Plan and its policies to either remove our previous

objections or require us to add further to our previous comments. Therefore, the concerns raised at Regulation 18 and the original Regulation 19 consultation in respect of those matters remain despite not making further representations on them at this current stage.

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.: Given the current and previous representations made on the Emerging Local Plan on behalf of our clients, we have confirmed that we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

Full name: Emma Morrison

Organisation (where relevant): Pegasus Group

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

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Pegasus Group have prepared this representation to the Submission Local Plan (Regulation 19) consultation (2025) on behalf of Co-op Estates.

5.2. Co-op welcome the production of the EDLP and wish to support the Council in its ongoing preparation.

5.3. Co-op have previously prepared representations to the East Devon Local Plan in relation to the site. The Council have been made aware that Co-op were considering the future of the store and have subsequently taken the decision to close the store in Axminster. In light of this, the evidence base is therefore not sufficient up to date to reflect this and the implications this would have.

5.4. Following this, the EDLP, as prepared, would not be considered sound. But it is the view of Co-op that modifications, as suggested in the representation above and updates to the evidence base could ensure a sound local plan can be delivered.

5.5. Co-op trust that the Council will find these comments useful as it continues to progress its Local Plan and would be happy to discuss these issues in greater detail in order to assist the Inspector and the Examination in Public

5.6. Co-op and Pegasus Group would also like to be kept informed of all forthcoming consultations on the Local Plan and any associated documents.

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: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction chapter, please use this box to set out your comments.: CONCLUSION In summary, Bloor Homes supports the overarching objectives of the East Devon Local Plan Second Regulation 19 Publication Draft in seeking to deliver sustainable development, address acute housing needs, enhance biodiversity and secure high-quality places. However, some of the policies within this Second Regulation 19 Draft consultation continue to raise concerns regarding clarity, proportionality and deliverability, particularly when applied cumulatively to large strategic housing allocations such as Land at Littleham, Exmouth. As set out in our representations, a number of policies adopt a prescriptive or uplifted approach to requirements—most notably in relation to affordable housing, specialist older persons’ accommodation, biodiversity net gain, self and custom build housing, ecological enhancement, monitoring obligations and open space provision—without sufficient evidence that the combined policy “ask” has been comprehensively assessed for viability at either plan-wide or allocation-specific level. In several instances, the policies also lack clarity as to how they interact with one another thereby increasing the risk of duplication, uncertainty at decision-taking stage and inconsistent application. National policy and guidance are clear that Local Plans must be positively prepared, justified, effective and consistent with national policy. To meet these tests of soundness, it is essential that policies are sufficiently flexible to respond to site-specific circumstances, provide certainty to decision-makers and developers alike, and demonstrably support the delivery of planned growth. Without targeted revisions to introduce clearer parameters, avoid overlapping requirements and properly reflect viability and deliverability considerations, there is a material risk that the plan will not achieve its intended outcomes. These comments are consistent with our client’s representation on WS01 Marcombe regarding viability-led affordable housing, proportionate BNG and targeted design coding. Bloor Homes therefore respectfully

requests that EDDC gives careful consideration to the matters raised and undertakes appropriate modifications to the relevant policies prior to submitting the East Devon Local Plan 2020 to 2042 to the Secretary of State. Doing so will strengthen the overall robustness of the Plan, improve its effectiveness, and ensure that it provides a sound and deliverable framework for growth across the district.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: National policy and guidance are clear that Local Plans must be positively prepared, justified, effective and consistent with national policy. To meet these tests of soundness, it is essential that policies are sufficiently flexible to respond to site-specific circumstances, provide certainty to decision-makers and developers alike, and demonstrably support the delivery of planned growth. Without targeted revisions to introduce clearer parameters, avoid overlapping requirements and properly reflect viability and deliverability considerations, there is a material risk that the plan will not achieve its intended outcomes. These comments are consistent with our client's representation on WS01 Marlcombe regarding viability-led affordable housing, proportionate BNG and targeted design coding.

Full name: Sarah R Smith

Organisation (where relevant): Rapleys LLP

Other party name (if relevant): The Crown Estate

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: Rapleys LLP on behalf of The Crown Estate

TCE submitted duly made representations to the 1st Regulation 19 consultation at the beginning of 2025, with particular focus on its land interest, proposed allocation GH/ED/80a, part of Policy SD02 at Axminster.

TCE acknowledges the request to limit comments to the proposed changes that have been made to the Plan.

In reviewing the documentation for this 2nd Regulation 19 consultation, TCE is pleased to note that the allocation of its land under GH/ED/80a (SD02) remains as previously proposed and consequently, TCE remains supportive of the Plan in that regard. TCE acknowledges the additional reference in the policy to ensuring the integrity of the Beer Quarry & Caves SAC.

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: TCE has noted, however, that no revisions have been made to the policies and paragraphs that it made in its earlier 2025 representations. Consequently, TCE requests that its earlier representations (appended again for convenience and the avoidance of doubt) be carried forward,

alongside this letter, to the Examination. TCE looks forward to having the opportunity to attend and speak at the Examination Hearing Sessions in due course.

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.: TCE looks forward to having the opportunity to attend and speak at the Examination Hearing Sessions in due course.

Full name: Margaret Leppard

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: No mention of titanium anywhere – it's present but not in industrial quantities

Full name: Martin Stockley

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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

Full name: Lucy Tyrrell

Organisation (where relevant): Lympstone Parish Council

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

Full name: Angela Brooks

Organisation (where relevant): Fisher German LLP

Other party name (if relevant): National Grid Electricity Transmission (NGET)

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction 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 Introduction 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.: New Infrastructure Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective. National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low carbon generation.

NGET operates the high voltage electricity transmission network within East Devon, which includes assets that are essential for both regional and national energy security. The Local Plan should therefore:

- Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.

- Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
- Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission scale equipment, including large transformers at strategic substations.
- Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
- Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that East Devon contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security

Full name: Steve Havers

Organisation (where relevant): National Highways

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

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 Introduction chapter, please use this box to set out your comments.: Further to the publishing of the Second Regulation 19 Publication Draft of The East Devon Local Plan 2020-2042 on 28 November 2025, National Highways write to provide comments relating to the soundness of the Publication Draft, and to make recommendations for areas in which the plan and associated policies can be strengthened from the perspective of protecting the Strategic Road Network (SRN).

2. On behalf of the Secretary of State for Transport, National Highways is responsible for operating, maintaining and improving the SRN. Our approach to plan making is specified by Department for Transport (DfT) Circular 01/22 ‘Strategic road network and the delivery of sustainable development’.

3. Locally, the SRN comprises the M5 motorway and the A30, A303 and A35 Trunk Roads, with the M5 Junctions 29 (J29) and 30 (J30) located on the boundary between the East Devon District Council authority area and that of the neighbouring Exeter City Council. The section of the M5 that forms the western boundary of East Devon is characterised by high traffic demands, particularly during commuter periods, along with Bank Holiday and Summer periods. M5 J29 and the A30 provide access to the Exeter & East Devon Enterprise Zone, which includes the Exeter Science Park. Around two kilometres east of M5 J29, the A30 Airport junction provides access to Exeter Airport, the SkyPark development and the growing Cranbrook New Community.

4. Our comments set out herein follow previous correspondence dated 28 March 2025 in which we set out our response to the First Regulation 19 Local Plan consultation. As part of the Second Regulation 19 consultation, we note that a ‘tracked changes’ version of the Publication Draft has been made available for review, alongside additional supporting evidence. We have focussed on this information and the associated ‘tracked changes’. Given the structure of the Publication Draft document is unchanged, we have

retained the structure of our March 2025 correspondence. Our comments are based on the published ‘tracked changes’ and we have not sought to repeat earlier comments in full. Nevertheless, our comments should be read in conjunction with our previous correspondence.

Full name: Neil Butler

Organisation (where relevant): Natural England

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to comment on the Second Regulation 19 Publication Draft of the East Devon Local Plan. We recognise the ambition shown by the Council in planning for significant strategic growth, particularly at the "West End" (Marlcombe), while seeking to enhance the district's outstanding natural environment.

Please see uploaded attachment for NE comments in full as submitted (also entered into Commonplace).

1.1, 1.14

Full name: Community Campaigner David Barton

Organisation (where relevant): Community Campaigner David Barton

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.1, 1.14

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: Authentic Traditional Architecture Design Codes should be a forefront priority for new construction

3. Do you consider that this part of the Introduction chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: TA and a ban on demolition of all buildings constructed prior to 1950 to truly combat the Climate Crisis.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Full protection and support for Listed buildings, Non-Designated Heritage Assets and non-classified buildings especially at risk of avoidable decline by housebuilders and property owners

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)

1.3

Full name: Lewis Carr

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.3

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: NO

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Is there legal precedent to re-do a Local Plan just halfway through it's run, after it was voted in to power? The democratically approved plan is due to run until 2031. It is only being torn up and replaced by this poorly thought out option is because planning has already used up all the agreed capacity. What's to stop this all happening again in 5 years when this allowance of building has been all used up?

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: Plan this to run from 2031, when the current plan expires.

3. Do you consider that this part of the Introduction chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: NO.

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: For all the same reasons listed under the legal challenges. Whether this is a legal thing to do or not, ethically it is not the right thing to do. Do the right thing because it's the right thing to do.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: Plan this to run from 2031, when the current plan expires.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: NO

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: How is this co-operating the constituents who voted for a plan that was known with respect to all the impacts up to 2031?

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.: I don't trust the council or planning authority to act in the best interests of the constituents or me.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.3

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: HBF note that this Plan is still intending to only cover the period from 1 April 2020 to 31 March 2042. The NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

HBF continues to consider it is unlikely that that this Plan would be adopted in 2026, especially as this further Reg 19 consultation is being undertaken in Jan 2026, and submission has been pushed back from 2025 to 2026. In recognition of the time that it can take to progress a new Local Plan through all its required stages, we therefore continue to suggest that the Council should consider extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. We again highlight the importance of the evidence base to be consistent with the Plan Period.

Our concerns about the Plan period therefore remain outstanding, and as such the plan is unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: continue to suggest that the Council should consider extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan.

1.9

Full name: Carole Crandon

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.9

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction

chapter is not sound. Please be as precise as possible.: Question of transport links.

Buses need to be made available in villages where population is more likely to be elderly and driving difficult.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

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)

1.14

Full name: Cllr Ben Ingham

Organisation (where relevant): EDDC Ward Member

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Whilst EDDC has consulted with neighbouring districts, as a member of the EDDC strategic planning committee, I believe the EDDC consultation with residents was one way and no attention was taken of people's responses and valid concerns, nor of local councillors. I suggest EDDC strategic planning officers were predetermined on what they wanted to happen. They guided through a result and process that suited them but neither East Devons future needs nor National Governments desire for sustainable development through efficient timely delivery.

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: It refers to Devon district consultation, but fails to involve genuine consultation with communities

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: I believe the emerging local plan should be rejected because it fails to coherently deliver National Governments targeted sustainable housing and it flies in the face of community consultation.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The co-operation is external, where it exists, but fails to be inclusive within East Devon.

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.: On many levels, the emerging East Devon Local Plan will fail to deliver. I am extremely keen to ensure the Inspector has ample opportunity to understand and reflect on the shortcoming of the delivery process of this plan.

Full name: Simon Coles

Organisation (where relevant): Carney Sweeney

Other party name (if relevant): DABB Partnership

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

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

Duty to Cooperate We refer to an entirely new subsection in the 2nd Reg 19 draft LP entitled “Duty to co-operate and joint working with neighbouring authorities” and associated paragraph 1.14. Paragraph 1.14 refers to joint working that ran through the production of the Local Plan. We request evidence of this including meeting minutes and other documents demonstrating engagement with neighbouring authorities sufficient to meet the statutory requirement. Paragraph 1.14 also refers to Our Shared Coordinates (KSD-002) and seeks to demonstrate – albeit belatedly - that the Duty has been met in large part by the production of this document, saying that it informed the Local Plan policy and was a “key element” in ensuring the Duty was met. We note also that Duty to Cooperate (CSD-010) is dated 10/12/25, meaning it had not been prepared for the 1st Reg 19 draft LP consultation. This is a significant omission and suggests that at most only limited engagement with neighbouring authorities took place. The evidence requested above will confirm the veracity of htis clam this either way. The Duty to Cooperate refers to the Greater Exeter Strategic Plan (GESP). It also identifies the bodies with whom engagement is required and the key issues but fails to demonstrate that appropriate cooperation has taken place sufficient to meet the Duty’s requirements. The history of this Council’s work with neighbouring authorities includes withdrawing from the GESP as a result of political concerns over the scale of new development it proposed – development that was considered necessary at the time to meet housing and other needs. This paints a picture of a Council that is unwilling to engage with other authorities if that means accommodating additional development needs within its administrative area. Finally, at Section 5, the Duty to Cooperate document sets a timetable for engagement with relevant bodies and explains that this will be done before the examination. This is putting the cart before the horse: the whole

point of the Duty is that this engagement takes place during and throughout plan making - not afterwards - so that matters such as the spatial strategy, housing numbers and site allocations reflect the outcome of engagement. It is considered that Our Shared Coordinates and Duty to Cooperate (KSD-002) fall way short of achieving any of the claims at paragraph 1.14 and as far as we can see, there is no evidence to demonstrate the statutory Duty has been met. Based on the Council's own evidence, it is considered that it has failed comprehensively to meet the Duty to Cooperate.

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: Nathan Price

Organisation (where relevant): Tetlow King Planning

Other party name (if relevant): South West Housing Association Planning Consortium

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

3. Do you consider that this part of the Introduction chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the South West region. As significant developers and investors in local people, the SWHAPC is well placed to contribute to Local Plan objectives and act as long-term partners in the community. Our clients play an active role in affordable housing delivery in East Devon and so we welcome this opportunity to comment on the emerging Local Plan. We understand that this second Regulation 19 Draft consultation follows the first Regulation 18 Publication Draft consultation held from February to March 2025. Our comments below are made in response to the track change version of the second Regulation 19 Publication Draft Local Plan published as part of the current consultation.

Chapter 1. Introduction The SWHAPC welcomes the new text at paragraph 1.14 regarding the Duty to Cooperate. Effective strategic planning across local planning authority boundaries is required by the NPPF and plays a vital role in how sustainable growth is delivered by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience.

Full name: John Hamill

Organisation (where relevant): John Hamill

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

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

Paragraph 1.14 is the “Duty to co-operate and joint working with neighbouring authorities”. Where is the “Duty to Co-operate and communicate with the Public”??? Whilst EDDC may have consulted with neighbouring authorities, there is little evidence of this with regards to the public and where there is evidence of this (e.g. the First and Second Reg 19 consultations), the EDDC’s consultation with the public has been one way with no real evidence provided that any notice/attention has been taken of the public’s and key organisations, comments, suggestions, and valid concerns. This is particularly evident with regards to the 1110 comments for Exmo_20, including those from Natural England, DWT, the RSPB and East Devon National Landscapes. Since we were made aware of this process back in September 2024, it has been evident that EDDC strategic planning officers were predetermined on what they wanted to happen, and have guided through a result and process that suited them without focussing on East Devons future needs nor the National Governments desire for sustainable development. SITE Exmo_20 IS A PRIME EXAMPLE OF THIS, YOU JUST HAVE TO LOOK AT THE VIDEOS OF THE STRATEGIC PLANNING COMMITTEE MEETINGS REGARDING THIS SITE STARTING WITH THE ONE ON THE 3RD SEPTEMBER 2024.....

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 ensure the Inspector hears from the public not the version EDDC puts forward

Full name: Alison Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC needs to improve their Community Involvement to ensure that they deliver a Draft Local Plan for East Devon that is not only needed but also wanted, and not just to appease the government and to meet targets. The current Draft Local Plan processes including the consultation stages are divisive and are destroying the public's confidence not only in this council but the whole planning process itself. The public, parishes, councils, committee members and councillors are effectively pitted against each other, not only in defence of their town/village but also down to site/area level. This seems to be deliberate and is clearly demonstrated by the new community of Marlcombe. This Second Reg 19 Consultation was specifically arranged because details about Marlcombe were still being finalised. All of this detail is now available and described within the Draft Local Plan under Chapter 4. However, as I write this comment on Sunday 25th January 2026 with less than one day to go before this consultation closes, there are only 6 comments against this new community for over 10,000 homes. The Planning Officers may say that it is because they have done a great job, everyone is happy etc.... Unfortunately the more likely reasons are to do with "apathy", along the lines of "it is going to happen in anyway", "why bother commenting", "it is a foregone conclusion", "what new community?", "where?", "better there than in our town/village, so hurry up and do it". No thought about the impacts of these 10,000 homes and its residents on the already straining infrastructure, or thoughts about how the roads especially around junctions 29 and 30 of the M5 are going to cope, or how this will impact the routes into towns/villages and beaches, etc...

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: No, I do not wish to participate in hearing session(s)

Full name: Alison Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The council have a Duty to cooperate-operate with the public. Paragraph 1.14 is the “Duty to co-operate and joint working with neighbouring authorities”. Where is the “Duty to Co-operate and communicate with the Public”? Whilst EDDC may have consulted with neighbouring authorities, there is little evidence of this with regards to the public and where there is evidence of this (e.g. the First and Second Reg 19 consultations), the EDDC’s consultation with the public has been one way with no real evidence provided that any notice/attention has been taken of the public’s and key organisations, comments, suggestions, and valid concerns. This is particularly evident with regards to the 1110 comments for Exmo_20, including those from Natural England, DWT, the RSPB and East Devon National Landscapes. Since we were made aware of this process back in September 2024, it has been evident that EDDC strategic planning officers were predetermined on what they wanted to happen, and have guided through a result and process that suited them without focussing on East Devons future needs nor the National Governments desire for sustainable development. SITE Exmo_20 IS A PRIME EXAMPLE OF THIS, YOU JUST HAVE TO LOOK AT THE VIDEOS OF THE STRATEGIC PLANNING COMMITTEE MEETINGS REGARDING THIS SITE STARTING WITH THE ONE ON THE 3RD SEPTEMBER 2024.....

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: No, I do not wish to participate in hearing session(s)

Full name: Martin Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The duty to cooperate with the public is an important part of this process. EDDC needs to improve their Community Involvement to ensure that they deliver a Draft Local Plan for East Devon that is not only needed but also wanted, and not just to appease the government and to meet targets. The current Draft Local Plan processes including the consultation stages are divisive and are destroying the public's confidence not only in this council but the whole planning process itself. The public, parishes, councils, committee members and councillors are effectively pitted against each other, not only in defence of their town/village but also down to site/area level. This seems to be deliberate and is clearly demonstrated by the new community of Marlcombe. This Second Reg 19 Consultation was specifically arranged because details about Marlcombe were still being finalised. All of this detail is now available and described within the Draft Local Plan under Chapter 4. However, as I write this comment on Sunday 25th January 2026 with less than one day to go before this consultation closes, there are only 6 comments against this new community for over 10,000 homes. The Planning Officers may say that it is because they have done a great job, everyone is happy etc.... Unfortunately the more likely reasons are to do with "apathy", along the lines of "it is going to happen in anyway", "why bother commenting", "it is a foregone conclusion", "what new community?", "where?", "better there than in our town/village, so hurry up and do it". No thought about the impacts of these 10,000 homes and its residents on the already straining infrastructure, or thoughts about how the roads especially around junctions 29 and 30 of the M5 are going to cope, or how this will impact the routes into towns/villages and beaches, etc...

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: No, I do not wish to participate in hearing session(s)

Full name: Martin Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Paragraph 1.14 is the “Duty to co-operate and joint working with neighbouring authorities”. Where is the “Duty to Co-operate and communicate with the Public”? Are we not an important part of this process? Whilst EDDC may have consulted with neighbouring authorities, there is little evidence of this with regards to the public and where there is evidence of this (e.g. the First and Second Reg 19 consultations), the EDDC’s consultation with the public has been one way with no real evidence provided that any notice/attention has been taken of the public’s and key organisations, comments, suggestions, and valid concerns. This is particularly evident with regards to the 1110 comments for Exmo_20, including those from Natural England, DWT, the RSPB and East Devon National Landscapes. Since we were made aware of this process back in September 2024, it has been evident that EDDC strategic planning officers were predetermined on what they wanted to happen, and have guided through a result and process that suited them without focussing on East Devons future needs nor the National Governments desire for sustainable development. SITE Exmo_20 IS A PRIME EXAMPLE OF THIS, YOU JUST HAVE TO LOOK AT THE VIDEOS OF THE STRATEGIC PLANNING COMMITTEE MEETINGS REGARDING THIS SITE STARTING WITH THE ONE ON THE 3RD SEPTEMBER 2024.....

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: No, I do not wish to participate in hearing session(s)

Full name: Nigel Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: EDDC needs to improve their Community Involvement to ensure that they deliver a Draft Local Plan for East Devon that is not only needed but also wanted, and not just to appease the government and to meet targets. The current Draft Local Plan processes including the consultation stages are divisive and are destroying the public's confidence not only in this council but the whole planning process itself. The public, parishes, councils, committee members and councillors are effectively pitted against each other, not only in defence of their town/village but also down to site/area level. This seems to be deliberate and is clearly demonstrated by the new community of Marlcombe. This Second Reg 19 Consultation was specifically arranged because details about Marlcombe were still being finalised. All of this detail is now available and described within the Draft Local Plan under Chapter 4. However, as I write this comment on Sunday 25th January 2026 with less than one day to go before this consultation closes, there are only 6 comments against this new community for over 10,000 homes. The Planning Officers may say that it is because they have done a great job, everyone is happy etc.... Unfortunately the more likely reasons are to do with "apathy", along the lines of "it is going to happen in anyway", "why bother commenting", "it is a foregone conclusion", "what new community?", "where?", "better there than in our town/village, so hurry up and do it". No thought about the impacts of these 10,000 homes and its residents on the already straining infrastructure, or thoughts about how the roads especially around junctions 29 and 30 of the M5 are going to cope, or how this will impact the routes into towns/villages and beaches, etc...

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 ensure that the issues/concerns identified are taken seriously and not just ignored.

Full name: Nigel Humphrey

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Paragraph 1.14 is the “Duty to co-operate and joint working with neighbouring authorities”. Where is the “Duty to Co-operate and communicate with the Public”??? Whilst EDDC may have consulted with neighbouring authorities, there is little evidence of this with regards to the public and where there is evidence of this (e.g. the First and Second Reg 19 consultations), the EDDC’s consultation with the public has been one way with no real evidence provided that any notice/attention has been taken of the public’s and key organisations, comments, suggestions, and valid concerns. This is particularly evident with regards to the 1110 comments for Exmo_20, including those from Natural England, DWT, the RSPB and East Devon National Landscapes. Since we were made aware of this process back in September 2024, it has been evident that EDDC strategic planning officers were predetermined on what they wanted to happen, and have guided through a result and process that suited them without focussing on East Devons future needs nor the National Governments desire for sustainable development. SITE Exmo_20 IS A PRIME EXAMPLE OF THIS, YOU JUST HAVE TO LOOK AT THE VIDEOS OF THE STRATEGIC PLANNING COMMITTEE MEETINGS REGARDING THIS SITE STARTING WITH THE ONE ON THE 3RD SEPTEMBER 2024.....

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.: The public need to be seen as relevant and an important part of this process. More needs to be done to ensure that this happens.

Full name: Liesbeth Kop

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Yes

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Paragraph 1.14 appropriately highlights the importance of joint working and cross-boundary cooperation in plan-making, including reliance on shared strategies and evidence. However, this principle is not consistently carried through into later parts of the plan dealing with strategic cross-boundary growth locations. In particular, development at the West End and north of Topsham has clear cross-boundary implications with Exeter City Council. Exeter's Regulation 19 Local Plan includes a specific policy commitment (Policy TI1 – Topsham Infrastructure Delivery Framework) which requires jointly agreed approaches to infrastructure delivery, landscape setting and environmental mitigation in this area. The absence of a clear linkage between paragraph 1.14 and the policies governing development at the West End creates a disconnect between the plan's stated commitment to joint working and its operational policy framework. As drafted, the plan is therefore not fully justified or effective in how it proposes to address known strategic cross-boundary issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: Paragraph 1.14 should be modified to clarify that the principle of joint working applies not only at a general strategic level, but also to specific cross-boundary growth locations, including development at the Exeter–East Devon boundary north of Topsham.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Yes

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)

Full name: Thomas Shillitoe

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Air quality mitigation strategy is required and still outstanding. This will likely need agreement with neighbouring LPAs, so needs to be consulted upon in Reg19 with neighbouring authorities in accordance with Duty to Cooperate compliance.

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: Cannot comment further until air quality mitigation strategy is provided by the LPA

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Air quality mitigation strategy is required and still outstanding. This will likely need agreement with neighbouring LPAs, so needs to be consulted upon in Reg19 with neighbouring authorities in accordance with Duty to Cooperate compliance.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: Cannot comment further until air quality mitigation strategy is provided by the LPA

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Air quality mitigation strategy is required and still outstanding. This will likely need agreement with neighbouring LPAs, so needs to be consulted upon in Reg19 with neighbouring authorities in accordance with Duty to Cooperate compliance.

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 understand how the LPA believes it has complied with its duty to cooperate with a potential cross-authority air quality mitigation strategy which is not yet known.

Full name: Thomas Shillitoe

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:

There is insufficient clarity and information regarding the Air Quality at East Devon Heaths SAC / SPA and delivery of the strategy for mitigation of the potential adverse impact of rising vehicle emissions on the East Devon Heaths SAC / SPA, as there is no mitigation strategy currently shown as viable and no supporting HRA (currently showing adverse impacts) for the Local Plan, it is impossible to know the implications that a strategy would have. If the strategy has implication on neighbouring LPAs such as Exeter & Teignbridge, they need to be advised and be able to comment on a Regulation 19 plan which includes the mitigation strategy (and a supporting HRA) for EDDC to believe they have complied with their Duty to co-operate. The unknown air quality mitigation strategy could have significant implications as to the viability of Exeter & Teignbridge Local Plans if its reach is similar to the existing recreational impacts mitigation strategy.

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: air quality mitigation strategy required to be provided to neighbouring authorities.

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

There is insufficient clarity and information regarding the Air Quality at East Devon Heaths SAC / SPA and delivery of the strategy for mitigation of the potential adverse impact of rising vehicle emissions on the East Devon Heaths SAC / SPA, as there is no mitigation strategy currently shown as viable and no supporting HRA (currently showing adverse impacts) for the Local Plan, it is impossible to know the implications that a strategy would have. If the strategy has

implication on neighbouring LPAs such as Exeter & Teignbridge, they need to be advised and be able to comment on a Regulation 19 plan which includes the mitigation strategy (and a supporting HRA) for EDDC to believe they have complied with their Duty to co-operate. The unknown air quality mitigation strategy could have significant implications as to the viability of Exeter & Teignbridge Local Plans if its reach is similar to the existing recreational impacts mitigation strategy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: air quality mitigation strategy required to be provided to neighbouring authorities.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There is insufficient clarity and information regarding the Air Quality at East Devon Heaths SAC / SPA and delivery of the strategy for mitigation of the potential adverse impact of rising vehicle emissions on the East Devon Heaths SAC / SPA, as there is no mitigation strategy currently shown as viable and no supporting HRA (currently showing adverse impacts) for the Local Plan, it is impossible to know the implications that a strategy would have. If the strategy has implication on neighbouring LPAs such as Exeter & Teignbridge, they need to be advised and be able to comment on a Regulation 19 plan which includes the mitigation strategy (and a supporting HRA) for EDDC to believe they have complied with their Duty to co-operate. The unknown air quality mitigation strategy could have significant implications as to the viability of Exeter & Teignbridge Local Plans if its reach is similar to the existing recreational impacts mitigation strategy. [attached: map of existing recreational impacts mitigation strategy]

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.: Air quality mitigation strategy required to be provided to neighbouring authorities. Currently not possible as Plan has no agreed air quality mitigation strategy and no supporting HRA. How can the Plan be considered sound, legally compliant and that the LPA have complied with their duty to cooperate.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.14

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Impacts of removal of the legal requirement of Duty to Cooperate:

As you will be aware the Government is not saving the Duty to Cooperate (DTC) requirement as a legal test for new Local Plans. However, there is clearly still an expectation that Councils will work together on effective plan-making and there remains a clear expectation that the housing needs of an area will still be met in full. Although compliance with DTC is no longer a legal compliance it is still part of the tests of soundness for the Plan.

The Duty to Cooperate Section of the Plan and the text at 1.14 is not considered to be sound as it is not consistent with national policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: This [The Duty to Cooperate] section of the Plan will need updating to reflect the changing nature of the requirement for LPAs to work together and its change from a legal, to a soundness and good planning consideration.

1.15

Full name: Margaret Leppard

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

1.15

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

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: NB Seaton does not have a neighbourhood plan

Figure 1

Full name: Thomas Shillitoe

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

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

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Map should show international site designations and national site designations. Misleading and contrary to the hierarchy of designations as explained in paragraph 181 of the NPPF December 2023.

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: Update map and undertake the site selection process and and plan production without a cavalier attitude regarding the Habitats Regulations and consideration of these international sites. Undertake a mitigation hierarchy assessment.

3. Do you consider that this part of the Introduction chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: Map should show international site designations and national site designations. Misleading and contrary to the hierarchy of designations as explained in paragraph 181 of the NPPF December 2023.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: Update map and undertake the site selection process and and

plan production without a cavalier attitude regarding the Habitats Regulations and consideration of these international sites. Undertake a mitigation hierarchy assessment.

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.: Why has the LPA, the competent Authority behaved with a cavalier attitude regarding the Habitats Regulations and consideration of international sites. Why is there no mitigation hierarchy assessment.

Figure 2

Full name: Sara Davies

Organisation (where relevant): Lymestone Water Quality Group

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 2

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

No

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: The list of key facts in Figure 2 does not reflect the importance of the natural watercourses (rivers, streams, and estuaries) to East Devon, or the increasing pressures on water quality and biodiversity in Figure 2.

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: Refer to the importance of the water environment in East Devon (to communities and the economy), and the impact of climate change on water quality and biodiversity, as well as flood risk. These are vital issues to address in a holistic, joined up way.

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: No

3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: The introduction sets the scene for the whole Local Plan. The fact that Figure 2 on key facts completely misses the importance of the water environment, and the impact of climate change on water quality and biodiversity is not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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

Introduction 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.: See comments above.

4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The omissions indicate that there has been inadequate cooperation on these interconnected issues. They are highly relevant to development planning in East Devon.

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.: The draft Local Plan still doesn't address the fundamental importance of the water environment in East Devon, and the need for a holistic integrated approach to adapt to climate change. It does not comply with the NPPF, and does not have any clear vision on these vital issues for East Devon.

Foreword

Full name: Margaret Leppard

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Paragraph

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

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

3. Do you consider that this part of the Introduction chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: “Key to this vision is our commitment to delivering genuinely affordable housing and implementing strong measures to reduce carbon emissions both during construction and throughout the operational lifespan of new developments. We also aim to exceed government requirements for biodiversity enhancement and set out a comprehensive strategy to support thriving town centres, robust community facilities, and opportunities for local businesses to flourish. By creating spaces that enable residents to live and work close to home, we aspire to make East Devon even more attractive to the industries of the future. We hope this vision delivers as far as we can on what our community has told us is important”

Drafted according to NPPF 2023 NOT new 2024 Nonetheless a really good start- Thank you!

Policies Map

Full name: John Connolly

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

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

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Settlement Boundary Change at Bystock Village, Brixington Ward, Exmouth

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: No

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: The settlement boundary change at Bystock Village, Brixington Ward, Exmouth is based on a factually incorrect application of the boundary change criteria, false assertions about links to nearby (non-existent) allocations and material omissions in relation to the made Exmouth Neighbourhood Plan heritage protections that apply to Bystock Village. These errors in fact render the Plan Unsound.

3. Do you consider that this part of the Introduction chapter is sound?: The remedy is simple. Leaving the Bystock Village settlement boundary at the location shown in the current Local Plan (2013 – 2031): - eliminates policy conflict between the made ENP and the emerging Local Plan, - eliminates policy conflict within the made ENP, - preserves the heritage protections for Bystock Village. In terms of the emerging Local Plan, the retention of the existing (2013-2031) settlement boundary at Bystock Village: - there is no reduction in strategic housing delivery targets, - there is no reduction in any emerging Local Plan benefits, - there is no need to change any other element of the emerging Local Plan policies, - there is no negative impact of any kind on the emerging Local Plan.

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.:

The LPA have failed to correct material errors in fact contained in the Evidence. I have attached a document with detailed examination of the clause by clause errors in the LPA evidence. This material is additional to submissions made in the previous Regulation 19 consultation. In summary the Plan is Unsound because the LPA Evidence: 1. has mis-applied their own boundary criteria to justify the settlement boundary change. This is a material error in fact. 2. contains false assertions, conflicting and misleading statements. These falsehoods constitute a material error in fact. 3. ignores the material fact of the clear and specific heritage protection policies contained in the made ENP which have been specifically reinforced by previous Planning Inspectorate decisions. This omission is contrary to Government guidance on Plan Making. 4. has failed to address or justify the wholly avoidable policy conflicts between the emerging Local Plan and the made ENP and within the ENP itself. This is contrary to Government guidance on Plan Making. 5. creates no new strategic supply housing opportunities attributable to this boundary change and adds no value to, nor enables, any other strategic goal within the emerging Local Plan. 6. fails to demonstrate how a change that adds no value should take precedence over existing ENP heritage protection policies. These errors in material facts and omissions render the boundary change proposal Unsound.

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: The proposed boundary change is demonstrably Unsound. Resolving the issue is simple; return the settlement boundary to that shown in the current Local Plan 2013-2031 and delete paragraph 13.5 of document KSD-010(rev) in its entirety. This solution causes no diminishment of the delivery of houses within the emerging Local Plan, nor does it require re-writing any policies or other measures within the emerging Local Plan. At the same time, it retains the heritage protections for Bystock Village and removes any policy conflict between the emerging LP and the made ENP.

4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: I do not believe that the LPA has made a reasonable attempt to reconcile their proposed boundary change with the damage it will cause to the clear heritage protections in the made Exmouth Neighbourhood Plan. Given the boundary change adds nothing of any kind to the emerging Local Plans objectives, it is hard to understand how the LPA is ignoring the clear desire of Exmouth Town Council to preserve this heritage area from unwanted

development. I can see no evidence of a structured conversation about this topic between the LPA and the Town Council. The LPA presumption appears to be that Exmouth will simply have to dismiss its heritage protections from the next iteration of the Neighbourhood Plan, regardless of the clear view of the resident of Exmouth.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Yes, I wish to participate in hearing session(s)

1. To which part of the High Quality Design chapter does your representation

relate?: Regulation 19 consultation second round objection.pdf:

<https://res.cloudinary.com/commonplace-digital->

[limited/image/upload/v1767800960/projects/68caca5749c1b0125abb2dae/respondent-upload/wjpur2jihgurzualozoc.pdf](https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1767800960/projects/68caca5749c1b0125abb2dae/respondent-upload/wjpur2jihgurzualozoc.pdf)

Full name: John W Thorne

Organisation (where relevant): JWT

Other party name (if relevant): Mr & Mrs S Anthony

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

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

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Land south of Underhill Close Lymptone

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

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: No

4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: Failure to have regard to earlier objections (submitted in March 2025)

and thereby address the anomaly in the Lymptone settlement boundary which excludes the objectors' land. As set out in previous submissions. The site marked Lymp_16 on the Reg 18 proposals map and coded in blue to reflect existing planning permission for residential development has subsequently and for no apparent reason, been excluded from the Lymptone Settlement Boundary. The attached extract from the Reg 19b map below shows it hatched white: • The respondents object in the strongest possible terms to the illogical, unjustified and arbitrary change to the settlement boundary line resulting in the exclusion of site Lymp_16 from the Lymptone boundary. This boundary line should revert to the position on the regulation 18 map.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Yes, I wish to participate in hearing session(s)

1. To which part of the High Quality Design chapter does your representation relate?: Representations on Reg 19b - Lymptone Settlement Boundary.pdf:

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

<https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1767994865/projects/68caca5749c1b0125abb2dae/respondent-upload/drphuddgkf9gewaeddsb.pdf>

Proposal:

1. Introduction

1. To which part of the Introduction chapter does your representation relate?:

Figure/Image

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

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

2. Do you consider that this part of the Introduction chapter is legally compliant?:

Settlement Boundary Change at Bystock Village, Brixington Ward, Exmouth

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: No

2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction.: The settlement boundary change at Bystock Village, Brixington Ward, Exmouth is based on a factually incorrect application of the boundary change criteria, false assertions about links to nearby (non-existent) allocations and material omissions in relation to the made Exmouth Neighbourhood Plan heritage protections that apply to Bystock Village. These errors in fact render the Plan Unsound

3. Do you consider that this part of the Introduction chapter is sound?: The remedy is simple. Leaving the Bystock Village settlement boundary at the location shown in the current Local Plan (2013 – 2031): - eliminates policy conflict between the made ENP and the emerging Local Plan, - eliminates policy conflict within the made ENP, - preserves the heritage protections for Bystock Village. In terms of the emerging Local Plan, the retention of the existing (2013-2031) settlement boundary at Bystock Village: - there is no reduction in strategic housing delivery targets, - there is no reduction in any emerging Local Plan benefits, - there is no need to change any other element of the emerging Local Plan policies, - there is no negative impact of any kind on the emerging Local Plan.

3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction 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 Introduction 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.: The proposed boundary change is demonstrably Unsound. Resolving the issue is simple; return the settlement boundary to that shown in the current Local Plan 2013-2031 and delete paragraph 13.5 of document KSD-010(rev) in its entirety. This solution causes no diminishment of the delivery of houses within the emerging Local Plan, nor does it require re-writing any policies or other measures within the emerging Local Plan. At the same time, it retains the heritage protections for Bystock Village and removes any policy conflict between the emerging LP and the made ENP.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: No, I do not wish to participate in hearing session(s)