



East Devon Local Plan 2020 to 2040:

Second Regulation 19 Publication Draft

Land at Littleham, Exmouth

INTRODUCTION

These representations have been prepared on behalf of Bloor Homes Exeter Limited, who have an interest in Land at Littleham, Exmouth.

These representations follow the submission made by Planning Potential in respect of the above site, which were issued to East Devon District Council (EDDC) in March 2025 on the First Regulation Publication Draft. These representations should be read in conjunction with that submission, a copy of which is enclosed.

Land at Littleham, Exmouth is allocated for a residential-led, mixed-used development in the emerging East Devon Local Plan. Strategic Policy SD01: Exmouth and its development allocations seek to develop around 410 new homes, 1.6 hectares of employment, and supporting community uses (Exmo_17).

Bloor Homes support this allocation and have been working in partnership with Clinton Devon Estates, who are the owners of the site, and EDDC bring forward this site for residential-led development. Survey work, technical studies and a robust evidence base is being prepared with a view to submitting an outline planning application in the first part of 2026. The site is the subject of signed Planning Performance Agreement with EDDC and has been subject to public consultation.

THE SITE

Adjacent to the east of Exmouth and the village of Littleham, the site lies immediately south of the Liverton Business and Retail Park. The northern boundary is formed by the B3178 Salterton Road. To the west of the site, there is the settlement boundary of Littleham, which consists of a mix of residential development along Chapel Lane. To the south of the cemetery and grounds of St Margaret's and St Andrew's Church, a Grade II* Listed Building. Open countryside is to the east. The site forms part of the East Devon NL.

The site covers approximately thirty hectares of arable fields that slope north to south. Hedgerows and mature trees, particularly in the south, cross the site and the Exmouth-Budleigh Salterton Cycle Track runs through its Centre. Most of the land is within Flood Zone 1, with a southern strip along Littleham Brook falling within Flood Zone 3. The site lies in a SSSI Impact Risk Zone.

Exmouth is the largest town in East Devon, with a population of around 35,700. It expanded rapidly during the Victorian era as a popular seaside resort. Tourism continues to play a significant role in the local economy although there is a substantial flow of out-commuters to Exeter. The town has a wide range of services and facilities with a large secondary school as well as a series of primary schools, a variety of shops, sports facilities, a library, GPs, hospital, railway station and regular bus services.

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NATIONAL PLANNING POLICY FRAMEWORK (NPPF) CONSULTATION (December 2025)

While the draft Framework currently holds consultation status, its policies will become a material consideration upon adoption (which is expected later this year). Importantly, policies found to be inconsistent with the revised NPPF will be afforded very limited weight unless examined and adopted under the new system.

Given that East Devon's local plan has not yet reached examination stage, it is essential that the Council anticipates these forthcoming changes. Incorporating the principles and policy direction set out in the Consultation will help ensure the emerging Local Plan remains robust, future-proofed, and capable of meeting the tests of soundness under the new regime. Failure to do so risks misalignment with national policy and could undermine the weight and effectiveness of the plan post-adoption.

As such, key themes which East Devon's Local Plan should integrate with include the governments ambition to improve density and land efficiency, with density requirements alongside a stronger presumption in favour of sustainable development while there is greater support for well-connected developments adjacent to existing settlements.

REPRESENTATIONS

These representations expands upon previous submission made by Planning Potential on behalf of Bloor Homes to the First Regulation 19 Publication Draft. Therefore, these representations solely focus on the alterations made as part of the Second Regulation 19 Publication Draft and should be read in conjunction with the representations submitted to the First Regulation 19 Draft.

Strategic Policy SP01 – Spatial Strategy

Strategic Policy SP01 expressly recognises Exmouth as the District's Principal Centre with the most significant development levels, which reflects the scale, infrastructure and accessibility of Exmouth. However, notwithstanding the representations submitted by Bloor Homes to the First Regulation 19 Draft, the policy still gives primacy to the West End and therefore, in order to ensure the plan remains effective and justified, we request development opportunities in Exmouth are given the same weight as those in the West End (adjusting the settlement hierarchy to reflect this would promote balanced growth, harness the full potential of Exmouth, and ensure equitable development across East Devon). Alternatively, the following minor modification to criterion B should be made in order to ensure that Exmouth is not approached as a residual location after West End delivery. This is suggested as follows:

"New development will be directed towards the most sustainable locations in East Devon, by:

[A...]

B. Promoting the most significant development levels, other than at the West End where the highest levels of growth are proposed, at the Principal Centre of Exmouth, including early-plan delivery on allocations capable of front-loading supply."

This will ensure a balanced growth trajectory for East Devon and reduces an over-reliance on the West End delivering the employment opportunity and homes required to meet the overall needs of the area.

Fundamentally, the minor changes proposed to this policy are welcomed and supported, however it is considered that the policy could be further improved to ensure an equitable weighting between Exmouth and the West End for the point of decision making. This will ensure even distribution of delivery.

Strategic Policy SP03 – Housing Requirements by Designated Neighbourhood Area

Following our previous representation, we are pleased that the Council have adopted our approach to express the housing figures required to meet demand as a 'minimum' amount, which aligns with the Government's objective to boost supply and to not limit the delivery of housing numbers beyond the required amount to support affordability. Fundamentally, Bloor Homes are in support of the wording of the policy.

Strategic Policy SP04 – Employment provision and distribution strategy

The employment allocation set out within this policy remains unchanged in principle and is now underpinned by more robust evidence through an updated Economic Development Needs Assessment, which have informed the proposed quantum of delivery. This robust, evidence-led approach is welcomed and supported.

However, our previous representation stated that there was a need for greater flexibility in employment uses to reflect the dynamic and evolving economic market. Many viable employment sectors do not fit neatly within the traditional framework of manufacturing, logistics, and office-based uses. Instead, the market increasingly comprises diverse sectors that play a critical role in delivering truly mixed-use and sustainable developments.

Accordingly, we maintain that the policy lacks sufficient flexibility to give equal weight to non-E Class employment uses. It is recommended that the policy includes caveats allowing for alternative employment uses or variations in size where supported by technical evidence. This adaptability is essential to respond to economic changes, technological advancements, and evolving work patterns, including hybrid and remote working models.

Embedding flexibility within the policy framework will not only future-proof employment land but also support the creation of vibrant, resilient places that integrate employment with housing, services, and green infrastructure. This approach aligns with the principles of sustainable growth and the Government's direction of travel set out in the NPPF December 2025 consultation, which advocates a non-prescriptive stance and encourages policies that enable a broad range of employment opportunities.

In light of the above considerations, we reiterate our comments but even more so considering the current NPPF consultation, to suggest that the wording of the policy changes to become more flexible and account for the following:

- Give equal weight to non-E-class employment uses in the policy.
- Include a policy caveat allowing flexibility where technical evidence shows a need for alternative employment uses or different size requirement; and
- Ensure the policy framework remains adaptable to economic changes, including technological advancements and evolving work patterns.

Bloor Homes therefore maintain their objection to the current wording of this policy.

Strategic Policy SD01 – Exmouth and Its Development Allocations

Bloor Homes continue to strongly support the allocation of Exmo_17: Land to the South of Littleham for 410 homes with 1.6ha employment space and supporting community uses. Regarding this, please reference the representation submitted to the First Regulation 19 Draft. In terms of the minor changes to the policy, as set out in the Second Regulation Draft, we would comment as follows.

The policy amended slightly in respect of its location within the East Devon National Landscape. It now states:

'The site is located in the East Devon National Landscape and particular sensitivity will need to be taken in respect of design and development approaches to conserve and enhance the natural beauty of the site and its wider landscape setting.'

Bloor Homes support this minor change. The site's location within the National Landscape has driven the approach to the site's proposed development in discussions with EDDC, East Devon National Landscape and the local community. Bloor are acutely aware of the need to create a landscape-led development that reflects the sensitivity of the site and ensure the wider beauty of the National Landscape is conserved and enhanced.

In addition, the following requirement is included within the allocation:

'New circular pedestrian and cycle routes should be provided within the site, together with connections to the wider network, including the South West Coast Path and to local services in Littleham and to the Liverton Business Park.'

The provision of a new circular pedestrian and cycle routes is supported by Bloor Homes. The emerging masterplan for the site includes a new circular footpath and cycle routes through the site to ensure that there are wider connections to the wider network. The new cycle and pedestrian routes are at the heart of the accessibility and sustainability strategy to the site. Bloor Homes support this minor change.

Strategic Policy HN02 – Affordable housing

The policy largely remains as written before except for the inclusion of the Marlcombe requirements.

Building on our previous representations in respect of Strategic Policy HN02, Bloor Homes continues to recognise the acute level of affordable housing need identified within East Devon and supports, in principle, the objective of securing mixed and balanced communities through the delivery of affordable housing as part of new development.

In the context of Land at Littleham, Exmouth the requirement to provide 30% affordable housing, with a tenure split of 65% social rent and 35% intermediate provision, broadly aligns with the evidence presented in the East Devon Local Housing Needs Assessment and the Exmouth Housing Needs Assessment (March 2024).

However, as set out in our earlier submission, it remains essential that this uplift from the Development Plan position is underpinned by robust and transparent viability testing that fully accounts for the cumulative impact of all policy requirements. The NPPF consultation (December 2025) reinforces the importance of ensuring that plan-wide affordable housing requirements are deliverable and do not undermine the overall viability of development.

In this regard, the continued absence of certainty around the cost and timing of significant infrastructure requirements associated with certain proposed allocations raises ongoing concern as to whether the affordable housing quantum identified can be viably achieved alongside other obligations.

While Strategic Policy HN02 appropriately provides flexibility for applicants to submit viability evidence at application stage, it is fundamental to the soundness of the plan that the policy itself is supported by a comprehensive, allocation-aware viability assessment prior to Examination, demonstrating that the combined policy 'ask', including affordable housing, infrastructure provision and other planning contributions, can realistically be delivered. Without such assurance, there remains a material risk that the policy, as currently drafted, could constrain delivery and fail to meet the tests of soundness.

Policy HN03 – Housing to meet the needs of older people

The principle of the policy remains the same, with changes centred on clarification.

In respect of Policy HN03, Bloor Homes continues to support the principle of widening housing choice for older people and recognises the role that both C2 and age-appropriate C3 accommodation can play in meeting identified needs across East Devon. However, concerns remain that the policy, as currently drafted and carried forward in the latest consultation, applies a uniform, site-wide requirement that does not adequately reflect the varied characteristics, constraints and opportunities of individual allocations.

In particular, the expectation that larger housing sites should deliver a minimum of 10% specialist older person accommodation on-site, subject only to commercial viability, risks unduly constraining deliverability where sites may not meet the locational or accessibility criteria necessary for such accommodation to function effectively, including proximity to services, public transport, and healthcare facilities. The new consultation does not provide further clarity on whether this requirement is intended to operate in addition to, or as part of, the affordable housing provision under Policy HN02; in the absence of such clarity, it must be assumed that it represents an additional requirement. For allocations such as Land to the South of Littleham, this would result in an effective expectation that up to 40% of dwellings are either specialist or affordable in nature, alongside significant infrastructure and mitigation obligations such as Suitable Alternative Natural Greenspace. This cumulative policy burden raises serious viability concerns and risks undermining the effectiveness of the plan.

Furthermore, the Council's approach does not sufficiently acknowledge that large, mixed-tenure developments are already well-placed to meet the needs of older people through a diverse range of dwelling sizes and typologies, alongside enhanced Building Regulations requirements for accessible and adaptable homes (including M4(2) and M4(3)). In this context, the additional blanket requirement for specialist older person accommodation is unnecessary and disproportionate. To ensure compliance with the NPPF and the tests of soundness, Policy HN03 should be amended to provide greater flexibility, clarify its relationship with affordable housing requirements, and, if necessary, rely on the targeted allocation of specialist older person accommodation in the most appropriate and sustainable locations rather than imposing a universal requirement across all major housing sites.

Policy HN05 – Self-build and custom build housing

The wording of the policy largely remains the same as the First Stage Regulation Draft. As such, Bloor Homes retains its objection to the policy.

Policy HN05, which adopts a prescriptive approach to self and custom build housing is not supported by national legislation or policy. The requirement for a minimum 5% provision on sites of 20 or more dwellings, alongside restrictive controls on marketing, pricing, infrastructure timing, plot size and, on larger sites, the inclusion of affordable self/custom build plots and plot passports, imposes a disproportionate burden on development and raises significant viability and deliverability concerns. While the principle of supporting housing choice is acknowledged, there is no robust evidence to justify the thresholds or quantum proposed, nor to demonstrate that identified demand must be met through mandatory on-site provision.

National policy makes clear that responsibility for meeting self and custom build demand rests with the local planning authority through the granting of sufficient permissions, rather than through obligating developers to allocate land. As drafted, the policy risks undermining the effectiveness of the plan and should be revised to adopt a more flexible, enabling approach that takes proper account of site-specific constraints and viability considerations.

Strategic Policy PB05 - Biodiversity Net Gain

The policy continues to require a minimum biodiversity net gain of 20% for major development. However, having regard to the NPPF consultation, it is strongly implied that requirements exceeding the national mandatory baseline of 10% should apply only in limited and clearly justified circumstances. In particular, higher BNG targets should only be supported by site-specific evidence and be restricted to defined allocations within the development plan where deliverability and viability have been fully tested.

In the absence of clear, allocation-specific justification, a blanket requirement for 20% BNG is not sufficiently robust and risks placing unnecessary burdens on development. To ensure consistency with the emerging context of the Framework and to meet the tests of soundness, the authority should not seek to impose biodiversity net gain levels above the national requirement unless a clear and proportionate evidence base demonstrates that such an uplift is necessary, deliverable and viable.

As such, Bloor Homes' objection is maintained on the above basis.

Policy PB07- Ecological enhancement and biodiversity in the built environment

Bloor Homes supports in principle the objective of Policy PB07 to secure ecological enhancements within the built environment; however, the policy remains overly open-ended and lacks sufficient clarity as to the scale, form and evidential basis of the enhancements being sought.

As drafted, the policy risks introducing uncertainty and duplication with other biodiversity requirements, including Biodiversity Net Gain under Policy PB05 and Habitat Regulations mitigation, with no clear distinction between what is expected to be secured through mandatory BNG, what constitutes additional on-site enhancement, and what is proportionate to different scales and types of development. In the absence of clear guidance, thresholds or a defined relationship with other biodiversity policies, there is a risk that Policy PB07 could be applied inconsistently at decision-taking stage, resulting in disproportionate and cumulative demands that have not been subject to plan-wide or allocation-level viability testing.

To ensure the policy is effective and consistent with national policy, Policy PB07 should be refined to provide clearer parameters on proportionality, avoid double-counting of ecological measures, and confirm that any additional enhancements sought beyond BNG must be justified, site-specific and evidence-led.

Policy PB09 – Monitoring requirements for new planting schemes

Bloor Homes supports the principle of ensuring that newly planted trees, hedges and habitats are successfully established and maintained; however, Policy PB09 is insufficiently clear and overly onerous in its current form. The policy introduces potentially long-term monitoring, reporting and replacement obligations without clearly defining proportionate timescales, trigger points or responsibilities, and without distinguishing between requirements already secured through Biodiversity Net Gain under Policy PB05 and additional planting or landscaping measures.

As drafted, Policy PB09 risks duplication of obligations, uncertainty at decision-taking stage and the imposition of ongoing maintenance and monitoring liabilities beyond those necessary to secure acceptable development, none of which appear to have been subject to plan-wide viability testing. To ensure the policy is effective and consistent with national policy, Policy PB09 should be refined to clarify the duration and scope of monitoring, limit replacement and remediation obligations to reasonable and evidenced circumstances and confirm that monitoring requirements will be proportionate to the scale of development and should not duplicate or extend beyond mechanisms already secured through BNG or other approved ecological management plans.

Policy OS02 – Sport, recreation and open space with development in association with development

Bloor Homes supports the principle of securing appropriate sport, recreation and open space provision as part of new development; however, Policy OS02, as drafted, lacks sufficient clarity and flexibility and risks imposing disproportionate and duplicative requirements. The policy introduces detailed typologies, thresholds and distance standards without adequately explaining how these requirements are intended to interact with other policy obligations, including SANGs, Biodiversity Net Gain and on-site green infrastructure requirements.

In particular, the absence of clarity as to whether and how multi-functional open spaces—such as SANG or landscaped green corridors—can contribute towards meeting OS02 standards creates uncertainty and raises the prospect of double-counting land and contributions.

Furthermore, the policy does not clearly recognise site-specific constraints or viability considerations, particularly on larger strategic allocations where significant infrastructure and mitigation is already required. To ensure the policy is effective and consistent with national policy, Policy OS02 should be refined to confirm that open space provision will be judged proportionately, allow for flexibility in how qualitative and quantitative standards are met, and avoid the duplication of requirements where open space functions overlap with other policy-compliant green infrastructure and mitigation measures.

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.