

Filtered Data Export

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMLIII Ltd

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

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

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. This draft policy requires that proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the Council specifying density recommendations for key allocations. This is an excessive obligation for a site of this scale, particularly where a full planning application is forthcoming. Clarification is required in respect of which allocated sites this is intended to apply to and what process it is anticipated would be required to be followed. It is recommended that this approach is only applied to very large sites.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

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

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. This draft policy requires that proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the Council specifying density recommendations for key allocations.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design 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 High Quality Design 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.: In order to avoid unnecessary repetition, clarification is required in respect of how this requirement relates to the Strategic Policy SD01 for Exmo_20 and its requirement for a comprehensive masterplan to be agreed with the Council.

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1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

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

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. This draft policy requires that proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the Council specifying density recommendations for key allocations. Clarification is required in respect of which allocated sites this is intended to apply to and what process it is anticipated would be required to be followed.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design 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 High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is recommended that this approach is only applied to very large sites.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. We generally support the spatial strategy set out within draft Strategic Policy SP01. We support the identification of Exmouth as the Principal Centre outside of the West End part of the district and its elevation, in comparison with the current Local Plan, above the other towns within the settlement hierarchy. This recognises that Exmouth is comfortably the largest town in East Devon and provides the greatest number and range of services and facilities. It is appropriate and entirely justified therefore that the plan identifies Exmouth as a higher tier settlement than the other towns. However, at only approx. 11% of the overall housing requirement, the apportionment to Exmouth would appear to, if anything, be lower than might be expected or appropriate to be directed to the largest and highest tier settlement within the district.

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Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. We generally support the spatial strategy set out within draft Strategic Policy SP01. We support the identification of Exmouth as the Principal Centre outside of the West End part of the district and its elevation, in comparison with the current Local Plan, above the other towns within the settlement hierarchy. This recognises that Exmouth is comfortably the largest town in East Devon and provides the greatest number and range of services and facilities. It is appropriate and entirely justified therefore that the plan identifies Exmouth as a higher tier settlement than the other towns. However, at only approx. 11% of the overall housing requirement, the apportionment to Exmouth would appear to, if anything, be lower than might be expected or appropriate to be directed to the largest and highest tier settlement within the district.

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Other party name (if relevant): Eagle One MMill Ltd

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. We generally support the spatial strategy set out within draft Strategic Policy SP01. We support the identification of Exmouth as the Principal Centre outside of the West End part of the district and its elevation, in comparison with the current Local Plan, above the other towns within the settlement hierarchy. This recognises that Exmouth is comfortably the largest town in East Devon and provides the greatest number and range of services and facilities. It is appropriate and entirely justified therefore that the plan identifies Exmouth as a higher tier settlement than the other towns.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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.: However, at only approx. 11% of the overall housing requirement, the apportionment to Exmouth would appear to, if anything, be lower than might be expected or appropriate to be directed to the largest and highest tier settlement within the district.

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Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Mr and Mrs Parks to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which they own at Meeting Lane, Lymptone. We generally support the spatial strategy set out within draft Strategic Policy SP01. We support the identification of Lymptone as a Local Centre and its elevation, in comparison with the current Local Plan, above the Service Villages within the settlement hierarchy. This recognises that Lymptone is suitable for additional development to reinforce the service role that it performs in respect of its surrounding area. It is appropriate and entirely Justified therefore that the plan identifies Lymptone as a higher tier settlement than the Service Villages. However, this elevated status within the settlement hierarchy is not reflected in the scale of housing (92 homes) that is actually allocated at Lymptone in comparison with some of the lower tier Service Villages. It is significantly below the levels at some of the other Local Centres (124 at Broadclyst and 216 at Woodbury) and even either lower or not dissimilar to the scale of housing proposed at many of the lower tier Service Villages (72 at Clyst St Mary, 102 at Feniton, 55 at Newton Poppleford, 64 at West Hill, 83 at Whimble). This anomaly would appear to have arisen from the site selection process which was largely driven by the outcomes of a series of meetings of the Strategic Planning Committee rather than an objective assessment of sites and the proposed spatial strategy. It is neither a Justified strategy nor an Effective one as it proposes to deliver more housing in settlements which have been found to be less sustainable than Lymptone, despite there being more land that is suitable for accommodating more housing within Lymptone, as we explain later in this letter.

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

-

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3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: We generally support the spatial strategy set out within draft Strategic Policy SP01 which seeks to focus a large proportion of development requirements at the West End part of the district.

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Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. It is unclear why it is proposed for the plan period to start from 2020, some five years ago now, when the plan is not expected to become an adopted one until 2026 at the earliest. That would not seem to be Justified taking account of the reasonable alternatives. We recognise that the Council has sought to take advantage of the provisions of paragraph 234 (a) of the revised NPPF and has therefore proposed to plan for only 80% of the local housing need for East Devon now identified under the standard method, published on 12 December 2024. This has two significant implications which needs to be borne in mind now at the plan making stage. Having regard to paragraph 78 (c) of the NPPF it means that almost from adoption of the plan, the Council will need to effectively demonstrate a six year housing land supply for the purposes of decision making. This does raise important questions as to how Positively Prepared the draft plan is and how Effective it will be over the plan period.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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.: It would seem far more logical and straightforward for the proposed plan period to commence in 2025. The plan will require a very significant update within five years of adoption in order to otherwise bring it in line with the revised NPPF. There is nothing in the draft plan, including in Chapter 17, Implementation and Monitoring to indicate the need for this or when and how it will be undertaken. This is a

key omission requiring modifications in order to make the plan sound in respect of all of the tests identified above.

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Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

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

We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. It is unclear why it is proposed for the plan period to start from 2020, some five years ago now, when the plan is not expected to become an adopted one until 2026 at the earliest. That would not seem to be Justified taking account of the reasonable alternatives. We recognise that the Council has sought to take advantage of the provisions of paragraph 234 (a) of the revised NPPF and has therefore proposed to plan for only 80% of the local housing need for East Devon now identified under the standard method, published on 12 December 2024. This has two significant implications which needs to be borne in mind now at the plan making stage. Firstly, it means that the plan will require a very significant update within five years of adoption in order to otherwise bring it in line with the revised NPPF. There is nothing in the draft plan, including in Chapter 17, Implementation and Monitoring to indicate the need for this or when and how it will be undertaken. This is a key omission requiring modifications in order to make the plan sound in respect of all of the tests identified above. Secondly, having regard to paragraph 78 (c) of the NPPF it means that almost from adoption of the plan, the Council will need to effectively demonstrate a six year housing land supply for the purposes of decision making. This does raise important questions as to how Positively Prepared the draft plan is and how Effective it will be over the plan period.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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.: It would seem far more logical and straightforward for the proposed plan period to commence in 2025.

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Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. It is unclear why it is proposed for the plan period to start from 2020, some five years ago now, when the plan is not expected to become an adopted one until 2026 at the earliest. That would not seem to be Justified taking account of the reasonable alternatives. We recognise that the Council has sought to take advantage of the provisions of paragraph 234 (a) of the revised NPPF and has therefore proposed to plan for only 80% of the local housing need for East Devon now identified under the standard method, published on 12 December 2024. This has two significant implications which needs to be borne in mind now at the plan making stage. Firstly, it means that the plan will require a very significant update within five years of adoption in order to otherwise bring it in line with the revised NPPF. There is nothing in the draft plan, including in Chapter 17, Implementation and Monitoring to indicate the need for this or when and how it will be undertaken. This is a key omission requiring modifications in order to make the plan sound. Secondly, having regard to paragraph 78 (c) of the NPPF it means that almost from adoption of the plan, the Council will need to demonstrate a six year housing land supply for the purposes of decision making. This does raise important questions as to how Positively Prepared the draft plan is and how Effective it will be over the plan period.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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.: It would seem far more logical and straightforward for the proposed plan period to commence in 2025.

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Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Mr and Mrs Parks to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which they own at Meeting Lane, Lympstone. It is unclear why it is proposed for the plan period to start from 2020, some five years ago now, when the plan is not expected to become an adopted one until 2026 at the earliest. That would not seem to be Justified taking account of the reasonable alternatives. We recognise that the Council has sought to take advantage of the provisions of paragraph 234 (a) of the revised NPPF and has therefore proposed to plan for only 80% of the local housing need for East Devon now identified under the standard method, published on 12 December 2024. This has two significant implications which needs to be borne in mind now at the plan making stage. Firstly, it means that the plan will require a very significant update within five years of adoption in order to otherwise bring it in line with the revised NPPF. There is nothing in the draft plan, including in Chapter 17, Implementation and Monitoring to indicate the need for this or when and how it will be undertaken. This is a key omission requiring modifications in order to make the plan sound in respect of all of the tests identified above. Secondly, having regard to paragraph 78 (c) of the NPPF it means that almost from adoption of the plan, the Council will need to effectively demonstrate a six year housing land supply for the purposes of decision making. This does raise important questions as to how Positively Prepared the draft plan is and how Effective it will be over the plan period. Opportunities for allocating more land for housing that can be delivered in the early years of the plan period should not be passed up as a consequence.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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.: It would seem far more logical and straightforward for the proposed plan period to commence in 2025.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MIII Ltd

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We recognise that the Council has sought to take advantage of the provisions of paragraph 234 (a) of the revised NPPF and has therefore proposed to plan for only 80% of the local housing need for East Devon now identified under the standard method, published on 12 December 2024. This has two significant implications which needs to be borne in mind now at the plan making stage. Firstly, it means that the plan will require a very significant update within five years of adoption in order to otherwise bring it in line with the revised NPPF. There is nothing in the draft plan, including in Chapter 17, Implementation and Monitoring to indicate the need for this or when and how it will be undertaken. Secondly, having regard to paragraph 78 (c) of the NPPF it means that almost from adoption of the plan, the Council will need to demonstrate a six year housing land supply for the purposes of decision making. This does raise important questions as to how Positively Prepared the draft plan is and how Effective it will be over the plan period.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 lack of detail on how the plan will be updated to be in line with the revised NPPF is a key omission requiring modifications in order to make the plan sound.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MIII Ltd

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: It is unclear why it is proposed for the plan period to start from 2020, some five years ago now, when the plan is not expected to become an adopted one until 2026 at the earliest. That would not seem to be Justified taking account of the reasonable alternatives.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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.: It would seem far more logical and straightforward for the proposed plan period to commence in 2025.

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: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP04

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

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. It is unclear at this stage what has formed the basis of the employment provision and distribution strategy set out within Strategic Policy SP04. There appears to be a lack of evidence underpinning this policy and how it has been conceived. We note that an element of the proposed strategy is for Use Class E(g)(iii) light industrial use needs to be met alongside larger housing developments as allocations. We question the rationale for this and what assessment has been made in respect of how suitable such allocations are for accommodating light industrial employment needs of the area. At this stage, we do not consider that it has been demonstrated that this strategy is Justified or likely to be Effective for delivering employment land and premises in the right places over the plan period.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Paragraph

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

4.1

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Strategic Policies WS01-WS15 allocate land for development at the West End but the land which Eagle One MMIII Ltd owns at Tithebarn Way, Exeter (HELAA Site Brcl_25) is omitted from the sites which are proposed to be allocated. The site was granted a renewed outline permission (Ref: 21/3148/MOUT) in 2023 for employment development and is actively being marketed. Both of these factors clearly demonstrate that it is, contrary to the Council's site sifting assessment (Housing and Economic Land Availability Assessment (HELAA) Appendix F (iii) Sites submitted in response to the 2022 call for sites) available for employment development and it should, at the very least, be allocated for that use within the draft local plan. However, there has not as yet been viable occupier interest in developing the site for employment purposes and because it is also in a suitable location for housing, in accordance with the NPPF, consideration should be given to whether it should be identified in the draft local plan as a site to help meet the more substantial housing requirements of the district. To rule this out, as appears to have happened within the site sifting report, solely on airport noise issues does not seem reasonable or justified when the site adjoins land which is being developed for over a thousand other houses with appropriate infrastructure, including a new school, local centre, sports pitches, etc, now also being delivered. Eagle One is a South West based private property development and investment company with its head office located at Exeter Science Park (within 350 m from the site). The company retains a substantial commercial investment portfolio including office buildings in Exeter, Plymouth, Bath and Bristol with the majority of the portfolio comprising properties that have been built by the company over its 40 year existence. This site has been within Eagle One ownership since 2003. The focus for the company has been to develop the site for the consented office use and retain it within their portfolio. Eagle One have made extensive efforts to bring forward the development, including:

- Property agents initially appointed in 2015 –a mix of local and regional firms of surveyors with specialism in offices
- Web-site set up in 2015
- High profile marketing board on site since Jan 2016
- Computer generated images produced
- Dedicated financial and scheme proposals made to occupiers
- Renewed outline planning application for offices submitted in 2021 More than £175,000 has been spent on marketing and planning (not including the original outline permission) specifically to promote office use for this site, excluding infrastructure costs. Eagle One has engaged with numerous occupiers over the marketing period but despite their best efforts have been unable to secure an occupier. The site has been serviced since completion of the Tithebarn Link Road final phase in 2018. Eagle One's commitment to trying to deliver office development on the site is emphasised by the effort and cost put into the planning process. They are very experienced in delivering commercial development across all sectors. However, since the Covid pandemic there has been a major change in demand for office space with a shift towards working from home. This has had a significant impact on office investment values, which together with the increase in build costs has meant that office development in this location is no longer viable. This is a view supported by the Council's Economic Development Officer. Furthermore, the Council's Economic Development Needs Assessment report of January 2023 also identifies an oversupply of 'office sites' with an expected demand in the period 2020-2040 of 2-14ha (page 65) against a supply (page 66) of 16-41ha. Planning permission (LPA ref: 21/3235/MFUL) was granted in January 2024 for the construction of 44 dwellings on land which adjoins the site to the east as shown on the approved layout plan set out below [see email submission for layout plan]. This means that Eagle One's land at Tithebarn Way, Exeter (HELAA Site Brcl_25) is now bordered by consented housing to the east and north. Tithebarn Way/Anning Road borders it to the west while Honiton Road borders it to the south. It is eminently suitable for housing development and clearly in a highly sustainable location. Paragraph 127 of the NPPF states that planning policies and decisions need to reflect changes in the demand for land and be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of development coming forward for its identified use it should reallocate the land for a more deliverable use that can help to address identified needs. In light of the very substantial housing need now identified under the standard method, published on 12 December 2024 and the significant implications identified above arising from Council's decision to only plan for 80% of that need, including the requirement for the plan to have a very significant update within five years of adoption

and the Council needing to demonstrate a six year housing land supply for the purposes of decision making almost from the point of adoption, the Council's reasons for dismissing this site and its omission as a housing allocation means that the draft plan is not Positively prepared, Justified, Effective or Consistent with national policy and fails all four of the tests of soundness. We therefore object to its omission as a site allocation on this basis.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 Development at the West End 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.: Eagle One's land at Tithebarn Way, Exeter (HELAA Site Brcl_25) is available for development and within a highly sustainable location for housing. It is also of a size that would mean it could be developed quickly and would be capable of forming part of the Council's five-year housing supply. It should be allocated for housing within the draft Plan.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: on behalf of Eagle Investments (SW) Ltd in respect of site Exmo_20.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
on behalf of Eagle Investments (SW) Ltd in respect of site Exmo_47

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. We support the proposed allocation of site Exmo_47 within Strategic Policy SD01: Exmouth and its development allocations for around 15 dwellings. We agree with the policy wording which requires that built development should be accommodated in the southerly parts of the site only and will need to be sensitively designed to avoid adverse impacts on the setting of the Point-in-view Registered Park or Garden to the north and west of the site boundaries. The southern and central part of the site is eminently suitable for a small housing development with the northern part providing an opportunity for landscaping to create a visual buffer to the Historic Park and Garden. This is fully explained within the heritage report prepared by Pegasus which is enclosed with this letter. A mix and range of sites sizes and types in different areas and suitable for a range of different types of housebuilders, and developers, will be required to help achieve a rolling supply of housing, as is encouraged within the NPPF. The NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. The site is within a sustainable location adjacent to the existing settlement boundary of Exmouth and of a size that would mean it could be developed quickly and would be capable of forming part of the Council's five-year housing supply. This site will assist the council in making appropriate provision for small sites. We also support the inclusion of the site within the proposed Settlement Boundary and its exclusion from the Green Wedge on the proposed policies map, which reflects its identification as a proposed allocation. Eagle Investments (SW) Ltd have been working with a local SME housebuilder and have undertaken technical and

planning preparatory work which has confirmed the deliverability of the site for housing.
A plan illustrating how the site could be accessed is enclosed with this letter.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Eagle Investments (SW) Ltd supports the proposed allocation of land which it owns at Exmo_20- land at St John's, Exmouth for mixed use development. The entire site identified on the Policy maps is available for development, is within a sustainable location adjacent to the existing settlement boundary of Exmouth and not covered by any environmental designations. There is a significant need for housing, including affordable housing, within the Exmouth area and the Exmo_20 site is suitable for development to meet those needs over the emerging plan period, along with a mixture of uses and community facilities, as part of a highly sustainable urban extension, as the Council's own site assessment has found. The draft policy proposes a comprehensive development scheme to accommodate social and community facilities, around 700 new homes and at least 2 hectares of employment land. Eagle Investments (SW) Ltd have previously submitted to the Council a Vision Statement and a subsequent Addendum (dated October 2024). These are both enclosed again with this letter so that they can be included in the package of information that is forwarded to the Local Plan Inspector. The Vision Statement and Addendum begin to demonstrate how the site allocation will be able to come forward on the basis of masterplan for the whole site. It is intended that discussions will commence with the Council as soon as possible regarding the draft policy requirement to agree a comprehensive masterplan for the site including how phased development will be undertaken. The Vision Statement and Addendum provide confidence that built development can be concentrated in the southern parts of the site while protecting the setting and tranquillity of nearby heritage assets, specifically St John in the Wilderness church. It also explains how the woodlands within and adjoining the site will be able to form a major asset and help in the achievement of high quality placemaking. Furthermore, it illustrates that

development will not need to protrude within 400 metres of the nearby Pebblebed Heaths. A Landscape and Visual Appraisal of the site is enclosed and demonstrates that there are no landscape or visual impact barriers to the development of the site as envisaged. The Addendum to the Vision Statement provides an overview of the access and transport strategy which the development of the site could adopt. It explains how vehicular access to accommodate development in the southern parts of the site can be provided from 'Southern Wood'. A plan illustrating how this can be achieved is enclosed. It also explains that the master planning of the site will maximise pedestrian and cycle links between the existing, adjacent residential and employment areas and the proposed new neighbourhood, through the provision of connected streets designed to be suitable for cycling and walking and, where appropriate, additional measures to ensure that cycling and walking are a safe and attractive means of transport to access existing bus services on Dinan Way and allowance for future provision of new local bus services within the development. This will ensure that walking, wheeling, cycling and public transport will be the natural first choice for short local journeys, in accordance with the requirements of draft Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport. A Transport Technical Note is also enclosed and explains that initial modelling has concluded that traffic Impacts on the nearby road network will be insignificant due to the planned road improvements to Dinan Way, which will enhance capacity and ensure efficient traffic flow. We consider that the inclusion for a requirement to provide at least 2 hectares of employment land requires some explanation and clarification within the draft policy. We note from Strategic Policy SP04 that the proposed uses to be included with the Exmo_20 site are to be limited to light industrial uses falling within Use Class E(g) (iii), being those which can be carried out in any residential area without causing detriment to the amenity of the area. As a minimum, confirmation of this within the draft policy is required to avoid any confusion as the site would not be suitable for B2 (General Industrial) or B8 (Storage and Distribution) uses for a variety of reasons. The Vision Statement and Addendum indicate that the Masterplan will include Workshops and Studios as part of a mixed-use development along with a local centre, Primary school (if required by DCC), community hub and working hub. Rather than specify 2 ha of land take for light industrial uses, it would be more appropriate for the policy to include a requirement for the inclusion of employment generating uses, as proposed by the Vision Statement, including uses falling within Use Class E a, b, c, d, e, f and g (iii). Exmo_20 site is not within the nationally important National Landscape (formerly AONB) and neither is it within any current local plan Green Wedge or Coastal Preservation Area designations. The proposed allocation of the site over sites which are within the National Landscape and other designations is entirely Justified and Consistent with national policy which requires that plans distinguish between the hierarchy of international, national and locally designated sites and allocate land with the least environmental or amenity value. Eagle Investments (SW) Ltd are working with a local SME housebuilder and

commencement of development of a first phase could be commenced within the next two years so that it can make a meaningful and valuable contribution to housing delivery within the next 5 years and beyond.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. Eagle Investments (SW) Ltd supports the proposed allocation of the land it owns as site Lymp_14 within Strategic Policy SD01: Exmouth and its development allocations. The site adjoins the north eastern boundary of the current Local Plan W147 housing allocation, which is currently under construction and known as Goodmores. Access to the site could be achieved from its western boundary through the adjacent Goodmores development. The site could therefore be developed as natural extension of the Goodmores site. There is a significant need for housing, including affordable housing, within the Exmouth area and the site is suitable for development to meet those needs over the emerging plan period as the Council's own site assessment has found. The site is available for development. The site is within a sustainable location adjacent to the existing settlement boundary of Exmouth and of a size that would mean it could be developed quickly and would be capable of forming part of the Council's five-year housing supply. Indeed, an outline planning application (LPA Ref. 25/0007/MOUT) proposing residential development on the site has been submitted and is currently under consideration by the Council, demonstrating that development on the site is achievable now. Eagle Investments (SW) Ltd have been working with a local SME housebuilder and development of the site can be delivered within the next three years.

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

-

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD10

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: We support the allocation of Mr and Mrs Parks' land at GH/ED/72a - Land at Meeting Lane for housing. The site is available and suitable for housing development. However, the Local Plan Review preferred options consultation which ran between November 2022 - January 2023 identified a much larger area of land at Meeting Lane, Lymptone (LP_GHED/72) as a preferred choice site allocation for 131 new homes and 0.52 hectare of employment land as illustrated on the plan extract below. This followed an assessment by the Council of all potential development sites within Lymptone which concluded in respect of all the land at Meeting Lane (GH/ED/72) that it is, "Well related to settlement and limited sensitivities. Good pedestrian access. Whilst in the existing coastal preservation area very limited views to the sea". Then in September 2024, in a report to the Strategic Planning Committee the entire allocation was proposed to be deleted with the following explanation, Whilst the west field is slightly contained within a 'bowl' with a ridge to north, the east field is open and more exposed. Views of site generally show an undeveloped, wooded skyline, but lightly settled on SW edge where there are existing dwellings. Within Coastal Preservation Area. Overall, a high/medium landscape sensitivity to new development". The following month however, in a report to the Strategic Planning Committee of 29 October 2024, it was recommended that the southern part of the western field only should be allocated, with an explanation as follows: "If whole site is not suitable for allocation, could a smaller part be allocated? Yes – potential to allocate the south western part of the site for development, adjacent to existing dwellings and better contained within the existing landform than the rest of the site. Around 1.5 hectares is potentially suitable for around 42 dwellings (indicated on map below) but need to consider impact on Nutwell Park to west including Grade II* Nutwell Court, and the location within the Coastal Preservation Area". Consequently,

the Reg 19 version of the plan only proposes a part of Mr and Mrs Parks' land which is available for development despite the Council's most recent assessment (in September 2024) only identifying the eastern field as "open and more exposed". There has been no explanation as to why the whole of the western field would not be suitable for allocation. Indeed, the western field currently contains two existing very large, modern agricultural barns adjacent to its eastern boundary which is its highest point. A residential development across the whole of the western field would be far less prominent within the landscape than these existing barns. Given that the currently proposed level of housing at Lymptstone is, as has been identified above, significantly below the levels at some of the other Local Centres and even either lower or not dissimilar to the scale of housing proposed at many of the lower tier Service Villages, we consider that there is an opportunity to correct this anomaly by allocating more land at Meeting Lane, including at least the whole of the western field which the Council's own evidence appears to support. As evidenced by the findings of the Council's own assessment, the development of the whole of the western field would not adversely affect the objectives of the Coastal Preservation Area policy and would be capable of respecting the setting of the adjacent Nutwell Park. We object to the omission of the wider western field as a proposed allocation because it makes Strategic Policy SD10: Development allocations at Lymptstone neither Positively Prepared nor Justified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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.:

However, this soundness issues could be remedied by extending the GH/ED/72a - Land at Meeting Lane allocated site to include the whole of the same field. The allocation of the whole of the western field would enable an increase in the number of dwellings within the allocation, which we suggest should be increased to in excess of 60 dwellings. Mr and Mrs Parks have been working with a local SME housebuilder and have undertaken technical and planning preparatory work which has confirmed the deliverability of the western field to provide homes that are in keeping with the surrounding area, provides connectivity to footpaths and bus stops and provide open space for people's wellbeing. We can also confirm that all of the land originally identified by the Council at the preferred options stage remains available and deliverable for development.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CC02

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

3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. While the objective of seeking to achieve carbon neutrality is fully supported, it is important that the Council identifies and establishes the potential impacts of any proposed policy measures on the deliverability of development. We recommend that the Council produces evidence that can be consulted on which seeks to test the impacts of such a policy on the viability of development. This would help to inform a decision on when such requirements should come into force and what other measures (e.g. reduction in CIL) might need to be considered in order to help the development industry to achieve such policy goals without impacting negatively on the deliverability of projects. Any measures required by the Local Plan should be consistent with national policy on this matter and the Government's Future Homes Standard.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CC02

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

3(b). If no, please give details of why you consider this part of the Mitigating Climate Change chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. While the objective of seeking to achieve carbon neutrality is fully supported, it is important that the Council identifies and establishes the potential impacts of any proposed policy measures on the deliverability of development. We recommend that the Council produces evidence that can be consulted on which seeks to test the impacts of such a policy on the viability of development. This would help to inform a decision on when such requirements should come into force and what other measures (e.g. reduction in CIL) might need to be considered in order to help the development industry to achieve such policy goals without impacting negatively on the deliverability of projects. Any measures required by the Local Plan should be consistent with national policy on this matter and the Government's Future Homes Standard.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

6. Mitigating Climate Change

1. To which part of the Mitigating Climate Change chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CC02

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Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

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

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. 30% affordable housing is sought from this policy on allocated sites outside of the West End and Axminster. The evidence for this appears to be the Three Dragons Viability Assessment of January 2025. However, we note that the Three Dragons report advises, "The Council has indicated that it plans to undertake a review of the CIL rates after the Local Plan process, and this will provide the opportunity for lower CIL rates to be set for the strategic site in this plan if required". We consider that this should be specified in the Plan. The NPPF's requirement for development viability to now be addressed at the plan-making stage means that it is vital that the Council's evidence underpinning the Plan is comprehensive and robust. The Council will need to be satisfied that its evidence has considered and assessed a comprehensive range of development and site types and sizes and in different locations in order that the policy measures that arise from it take into account the full suite of different scenarios that might apply. It is unclear at this stage to what extent the preparation of the Three Dragons report involved engagement with a broad range of interests from within the development industry. It is important that an appropriate balance is struck between seeking to meet the delivery of affordable housing, infrastructure requirements and sustainability/design objectives. Development has to be deliverable and policy requirements therefore need to be realistic in terms of what can be achieved. We are not yet convinced that the evidence underpinning this policy is sufficiently robust.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

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Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

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No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. 30% affordable housing is sought from this policy on allocated sites outside of the West End and Axminster. The evidence for this appears to be the Three Dragons Viability Assessment of January 2025. However, we note that the Three Dragons report advises, "The Council has indicated that it plans to undertake a review of the CIL rates after the Local Plan process, and this will provide the opportunity for lower CIL rates to be set for the strategic site in this plan if required". We consider that this should be specified in the Plan. The NPPF's requirement for development viability to now be addressed at the plan-making stage means that it is vital that the Council's evidence underpinning the Plan is comprehensive and robust. The Council will need to be satisfied that its evidence has considered and assessed a comprehensive range of development and site types and sizes and in different locations in order that the policy measures that arise from it take into account the full suite of different scenarios that might apply. It is unclear at this stage to what extent the preparation of the Three Dragons report involved engagement with a broad range of interests from within the development industry. It is important that an appropriate balance is struck between seeking to meet the delivery of affordable housing, infrastructure requirements and sustainability/design objectives. Development has to be deliverable and policy requirements therefore need to be realistic in terms of what can be achieved. We are not yet convinced that the evidence underpinning this policy is sufficiently robust.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

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

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as was adopted in the Sedgemoor Local Plan (adopted 2019), for example.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

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

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as was adopted in the Sedgemoor Local Plan (adopted 2019), for example.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMill Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

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

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as was adopted in the Sedgemoor Local Plan, for example.