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

Filtered Data Export

## 2.1

**Full name:** Dee Woods

**Organisation (where relevant):** Otter Valley Association

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** Given the problems of planning for future growth in a District with limited land that is outside the National Landscapes, this is a well-considered and comprehensive set of documents, maps and evidence for policies on future development. However we do consider certain elements of the Plan to be unsound. This is mainly in relation to the Spatial Strategy, development sites in Towns and Villages that are within the National Landscapes, and the estimated housing needs figures that are used to justify so many allocations within the National Landscapes. We also consider that the climate mitigation and adaption chapters and policies could be strengthened in view of the climate emergency. The vision and set of objectives seems appropriate, with climate emergency being to the fore, but the biodiversity crisis should also be recognised as of equally importance. Objective 10 – securing infrastructure to support new development is a vital component of the Plan.

**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:** Philippa Gatehouse

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

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

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** C G Fry & Son maintain that the Vision Statement is innately unbalanced, indicating that the draft LP places higher priority on environmental consideration than on addressing the national housing crisis.

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** DABB Partnership

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** CarneySweeney on behalf of DABB Partnership

DABB Partnership reiterates its support for the aspirations of the plan to raise standards and deliver high quality development and good design and the need to assess and mitigate the impacts of development, subject to the following caveats:

- All proposed local policies must be justified.
- Potential impacts on viability and deliverability must be properly understood.
- Policies should not seek to unnecessarily replicate the NPPF or Building Regs (or other regulatory regimes).
- Policies should not be drafted in such a way that they hinder or discourage development.
- Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations.

Local Plan Vision Statement All previous comments regarding the lack of references in the Vision Statement to meeting development need, and in particular housing need, remain valid

**Full name:** Samantha Thomas

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** Taylor Wimpey

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** Local Plan Vision Statement All previous comments regarding the lack of references in the Vision Statement to meeting development need, and in particular housing need, remain valid

**Full name:** Samantha Thomas

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** Taylor Wimpey

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** It is notable that the Local Plan Vision statement does not refer to the allocation and delivery of enough land to meet housing needs, reflecting Section 5 of the Framework. The requirement for Development Plans to be consistent with the Framework is a central tenet to plan-making and therefore it is a prominent omission to not state support for the Government's objective of "significantly boosting the supply of homes", provided at Paragraph 61 of the Framework.

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

**Full name:** Chris Dadds

**Organisation (where relevant):** JLL

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

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** Our client welcomes and share the aims and objectives of the draft Local Plan. A core objective of the Plan is to support business investment and job creation opportunities within East Devon and support a resilient economy. Our client wholly supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of new development including employment and commercial floorspace will help support mixed and balanced communities, ensuring sustainable growth for all.

**Full name:** Chris Dadds

**Organisation (where relevant):** JLL

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

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** Our client welcomes and share the aims and objectives of the draft Local Plan. A core objective of the Plan is to support business investment and job creation opportunities within East Devon and support a resilient economy. Our client wholly supports this ambition which represents an important step in the right direction, but this must include the identification of sufficient land to meet a range of employment needs.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Vision 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 Vision 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.:** must include the identification of sufficient land to meet a range of employment needs.

**Full name:** Chris Dadds

**Organisation (where relevant):** JLL

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

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** Visions, Aims and Objectives of the Plan Our client welcomes and share the aims and objectives of the draft Local Plan. A core objective of the Plan is to provide high quality new homes to meet people’s needs. Our client supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring development will be viable and hence delivered. The delivery of much needed new homes will need to be balanced alongside other land uses including commercial and community facilities to ensure sustainable growth for all. The Plan also seek to actively respond to the climate and ecological emergencies in securing sustainable development. These objectives are wholly supported by our client.

**Full name:** James McMurdo

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

**Other party name (if relevant):** Stuart Partners Ltd

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

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

Our client maintains objections to the vision for the reasons set out in their First Regulation 19 response (i.e. against the vision, objectives and sustainability appraisal work, evidenced sub regional housing and employment land needs, and market forces, the Plan proposes C50% of its housing and employment land needs in national landscape areas and a significant majority of its “West End” housing and employment land as part of a future Part B plan making process, and does not even attempt to deal with Exeter’s unmet need, all of which is neither sustainable nor “sound” plan making.”)

**Full name:** James McMurdo

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

**Other party name (if relevant):** Stuart Partners Ltd

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

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

Our client maintains objections to the vision for the reasons set out in their First Regulation 19 response (i.e. against the vision, objectives and sustainability appraisal work, evidenced sub regional housing and employment land needs, and market forces, the Plan proposes C50% of its housing and employment land needs in national landscape areas and a significant majority of its “West End” housing and employment land as part of a future Part B plan making process, and does not even attempt to deal with Exeter’s unmet need, all of which is neither sustainable nor “sound” plan making.”)

**Full name:** Emma Morrison

**Organisation (where relevant):** Pegasus Group

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

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** Co-op is in general support of the strategic objectives, certainly promoting significant development within Axminster (element C).

**Full name:** James Dunster

**Organisation (where relevant):** Clarke Willmott LLP

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

**2. Do you consider that this part of the Vision chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Vision chapter is not legally compliant. Please be as precise as possible.:** Paragraph 189 of the National Planning Policy Framework December 2024 ("NPPF") states that "great weight should be given to conserving and enhancing landscape and scenic beauty in... National Landscapes".

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Para 2.10 should read "The objectives are not in a priority order or ranking and aside from Objection 8, no one carries any more or less weight than any other. Objective 8 is given greater weight than the other objectives in compliance with the requirements of the National Planning Policy Framework (December 2024)".

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** As above, great weight should be attached to conservation and protection of the National Landscape. It is clear this is not the case from the wording in the chapter and from the remaining Regulation 19 document. Paragraph 2.9 states that NLs will be "protected and enhanced". This is at odds with inclusion of development sites within NLs, particularly where greater development should be prioritised in areas outside of the NL

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

**sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

Please see 2(c) above

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

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

Irrelevant considering duty to co-operate being removed by Government

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

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1

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

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** The Vision and Objectives are not positively prepared and as such the Plan is unsound.

Objective 3: Meeting future housing needs- seeks to provide high quality new homes to meet people's needs. In order to be positively prepared HBF continue to believe the Plan should set out its objective to meet the Housing Needs of East Devon in full.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Vision 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 Vision 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 Plan should set out its objective to meet the Housing Needs of East Devon in full.

## 2.1 - 2.9

**Full name:** John Bailey

**Other party name (if relevant):** NA

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1 - 2.9

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

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

**2(a). If yes, and you wish to support the legal compliance of this part of the Vision chapter, please use this box to set out your comments.:** It has to be yes as Starters government has made it so. It by no means is in anyway sensible and practical

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The whole thing needs to be considered by practically logical people, not by the inept individuals who wish this to happen

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** As with the above, the whole vision is ridiculously misguided and will bring social discomfort to the people of East Devon and beyond. The total lack of services and inadequate road network will simply become far worse than it is now. Wake up before it's too late and stand up to Starmar and his useless colleagues if any of you have the guts.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Vision 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 Vision 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.:** Scrap the whole scheme and and get your services and road network etc in order first.

Many won't have the foresight and brains to do this. We can only hope that there are a few who have the necessary abilities

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

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

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** To try knock some sense and realism into this whole concept. Are you brave enough to let me take part. Probably not!

## 2.1 - 2.11

**Full name:** Richard John Eley

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1 - 2.11

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

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

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

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

**Full name:** Robin James Meadwell

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.1 - 2.11

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

**1(c). If the comment is related to a site, please state the site reference here::**

Comments relate to all sites and tiers shown in Figure 3.

**2. Do you consider that this part of the Vision chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Vision chapter is not legally compliant. Please be as precise as possible.:** Whilst I cannot comment on whether the proposed developments shown in Figure 3 of the Local Plan are legally compliant or not, the proposed volume of development for housing and land for Employment Land is contradictory to the vision as set out in the introduction. Development of land for Residential and Employment on this scale and in the locations identified would have a significant and detrimental impact on the natural landscape. Using areas of land which are currently part of the natural landscape and completely undeveloped will be lost to the future generations which the Local Plan states it is seeking to protect.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The total number of new Residential homes proposed in the Local Plan is 14,816. This would significantly increase the population of East Devon as the majority of homes would be occupied by 2 or more people or families, this could potentially increase the number of residents by more than 30,000 people and increasing the population on this scale, even over a period of 15 years, will again irrevocably change the rural nature of East Devon and place significant strain on the existing infrastructure. If new roads are built to ease the burden on roads such as the A35 and A30, this will again irreversibly alter the landscape which East Devon District Council states it is seeking to protect. There are currently 3,246 residential properties for sale in East Devon (Rightmove, as at 24 January 2026) and a further 379 new build houses for

sale in East Devon (Zoopla, as at 24 January 2026). Whilst the current proposals for 14,816 new residential properties to be built includes 10,000 at the new development of Marcombe, the remainder are predominantly to be located in Axminster (1,100) and Exmouth (1,450). As at 24 January there are 481 properties for sale in and around Axminster and 1,346 for sale in and around Exmouth, the current availability of properties across all price ranges does not suggest that current demand is excessively greater than the supply such that it warrants the volume of new housing proposed. Whilst the development of further new housing may be necessary, this may be better focused on targeting specific needs, such as the development of housing suitable for those wishing to downsize and to enable the sale of family homes.

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

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

Whilst it is clearly important to have a clear local plan and vision, setting a housing plan to meet the arbitrary and overly optimistic targets of a Government that has not considered the local needs and requirements is not in the best interests of current or future residents. Governments change, as do national policies; regions and the landscapes do not change and local knowledge is essential when considering any development proposals.

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

## 2.2 and Table I

**Full name:** Sara Davies

**Organisation (where relevant):** Lymptstone Water Quality Group

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.2 and Table I

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

**2. Do you consider that this part of the Vision chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Vision chapter is not legally compliant. Please be as precise as possible.:** It is not consistent with national policy on adapting to climate change. It makes no reference to the importance of integrated water management, based on the national Sustainable Drainage Systems (SuDS) standards (with multiple benefits to flood risk, water quality, biodiversity, and amenity). In Paragraph 2.2, it only states 'Communities in East Devon will be adapting to a changing climate', and there are no clear objectives on this issue in Table 1. There needs to be a much more robust vision reflecting the growing impact of climate change on our environment, communities, and economy - and the need for a holistic, integrated approach.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** Provide a vision of integrated water management to adapt to climate change effectively - using the national Sustainable Drainage Systems (SuDS) standards and the catchment-based approach to bring multiple benefits (to flood risk, water quality, biodiversity, and amenity).

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** It will not ensure cost-effective action to adapt to climate change, and the opportunities associated with integrated water

management and SuDS will be missed. Consequently, it will result in increased financial costs and greater impact on the environment and local communities.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Vision 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 Vision chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:**

Update the vision so it reflects the importance of the national SuDS standards (required under NPPF) to drive integrated water management. See ‘Planning Advice for Integrated Water Management’, <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>

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

**4(b). If no, please give details of why you consider this part of the Vision chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** The fact that the vision does not provide more detail on how East Devon will adapt to climate change (i.e., using SuDS to deliver integrated water management on developments, in line with the catchment-based approach) indicates that there has been inadequate cooperation on these issues.

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** The vision is not consistent with national policy on climate change adaptation, and it completely misses the vital role of planning authorities in driving integrated water management (with multiple benefits) - in line with SuDS standards and the catchment-based approach. It will not ensure sustainable development and, consequently, this will cause considerable harm to the local environment, economy, and communities in East Devon.

## 2.4

**Full name:** Margaret Leppard

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.4

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** I support high tech NB MINERAL MINING ; Also Training for especially SUDS Technicians

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** Beware “haze of nostalgia” (BBC Reith lecture) that obstruct a clear view e.g p21 “Rural East Devon will retain its outstanding charm and character” ??

## 2.6, 2.8

**Full name:** Martin Stockley

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.6, 2.8

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

**1(c). If the comment is related to a site, please state the site reference here.:** Otry21

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** Paragraph 2.6 states that the Plan should meet the needs of the locality and para 2.8 states that it should contribute to the health and happiness of residents. Development on site Otry21 does NOT fill a local need (there are currently nearly 100 homes for sale in Ottery St Mary, 25% of which are priced at £250,000 or less) and will most certainly not contribute any health and happiness - quite the reverse, in fact.

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

Remove site Otry21 from the EDDC Local Plan

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

## 2.7

**Full name:** Margaret Leppard

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.7

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

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** ‘Beware cart before the horse’. Urgently and effectively apply Grampian condition

## 2.8 - 2.9

**Full name:** Margaret Leppard

**Proposal:**

2. The Vision

**1. To which part of the Vision chapter does your representation relate?:** Paragraph

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

2.8, 2.9

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** Pie in the sky vision - you are embedding policy dissonance that makes it very difficult to move forward

## Figure 3

**Full name:** Caroline Lewis

**Organisation (where relevant):** Lymptstone Water Quality Group

**Proposal:**

2. The Vision

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

Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Figure 3

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

**2. Do you consider that this part of the Vision chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Vision chapter is not legally compliant. Please be as precise as possible.:** Figure 3 does not provide the number of homes and development land for tier 3 and tier 4 areas and is therefore not an accurate representation of the vision and therefore can't be legal.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** All proposed new homes numbers and development land areas must be included in figure 3 otherwise it can be changed after the plan is accepted.

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** One of the objectives of the plan is to help protect and enhance villages but the vision for large development in villages does not meet the Plan's own objective. However, Figure 3 does not inform people of the number of homes and land development planned for villages (including tier 3 villages) so people have not been able to provide accurate feedback on the vision.

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

Make clear in figure 3 how many homes and land development are planned in tier 3 and tier 4 areas then provide people with the opportunity to to feedback when they have clear data.

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

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

**Full name:** Thomas Shillitoe

**Proposal:**

2. The Vision

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

Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Figure 3

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

**2. Do you consider that this part of the Vision chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Vision chapter is not legally compliant. Please be as precise as possible.:** The entire chapter 2 and the 2.11 figure 3 map makes no reference to the European designation sites within the district, but mentions and maps the National designation “National Landscape” sites. This is inconsistent and in conflict with the NPPF December 2023 paragraph 181 which states “Plans should: distinguish between the hierarchy of international, national and locally designated sites”.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** LPA to give significant weight to consideration of European site designations when developing this Plan. There is widespread disregard for these sites, instead focussing on national "National Landscape" sites.

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

**3(b). If no, please give details of why you consider this part of the Vision chapter is not sound. Please be as precise as possible.:** The entire chapter 2 and the 2.11 figure 3 map makes no reference to the European designation sites within the district, but mentions and maps the National designation “National Landscape” sites. This is inconsistent and in conflict with the NPPF December 2023 paragraph 181 which states “Plans should: distinguish between the hierarchy of international, national and locally designated sites”.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Vision 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 Vision 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.:** LPA to give significant weight to consideration of European site designations when developing this Plan. There is widespread disregard for these sites, instead focussing on national "National Landscape" sites.

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** Why are the International site not identified and given consideration in the early stages of plan making?

## Table I

**Full name:** Dee Woods

**Organisation (where relevant):** Otter Valley Association

**Proposal:**

2. The Vision

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

Figure/Image

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

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

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

**2(c). Please set out the modification(s) you consider necessary to make this part of the Vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Vision chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:** The vision and set of objectives seems appropriate, with climate emergency being to the fore, but the biodiversity crisis should also be recognised as of equally importance. Objective 10 – securing infrastructure to support new development is a vital component of the Plan.

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

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

**Full name:** John Hamill

**Proposal:**

2. The Vision

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

Figure/Image

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

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

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

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

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

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** To ensure the Inspector hears from the public not the version EDDC puts forward



**Full name:** Kim Miller

**Organisation (where relevant):** Historic England

**Proposal:**

2. The Vision

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

Figure/Image

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

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

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

**3(a). If yes, and you wish to support the soundness of this part of the Vision chapter, please use this box to set out your comments.:** We support the proposed adjustment to the terminology of Objective 7 to refer broadly to the ‘historic environment’ rather than only ‘built’ heritage.