

Filtered Data Export

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal:

1. Introduction

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

Paragraph

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

1.1

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

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

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

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

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

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

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

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

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

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

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

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Full name: James McMurdo

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Other party name (if relevant): Stuart Partners Ltd

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL10

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

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

Objection (maintained) Reasons (as per previous representations)

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

- Delete the policy and rely on Paragraph 187 (and footnotes) of the NPPF (which should be the preference, we respectfully suggest); or
- Redraft the policy based on Paragraph 187 of the NPPF (but all that would do is duplicate policy provision).

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Other party name (if relevant): Stuart Partners Ltd

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

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

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

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

Objection (maintained) Reasons (as per previous representations)

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

- Because the policy is ineffective and not sound in this regard, amend it to consider Policy WS01; and,
- Because there is no merit in the identification of our Client's land as part of Green Wedge at Pinhoe, as it would not reflect the criteria for identification as set out within the proposed policy nor would its development be restricted by the proposed policy, remove this land from the Green Wedge designation.

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL04

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

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

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Objection (maintained) Reasons (as per previously)

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- Delete the policy and rely on Paragraph 187 (and footnotes) of the NPPF (which should be the preference, we respectfully suggest); or
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Objection (maintained) Reasons (as per previous representations))

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- Because the policy is ineffective and not sound in this regard, amend it to consider Policy WS01; and,
- Because there is no merit in the identification of our Client's land as part of Green Wedge at Pinhoe, as it would not reflect the criteria for identification as set out within the proposed policy nor would its development be restricted by the proposed policy, remove this land from the Green Wedge designation.

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Objection (maintained) Reasons (as per previous representations))

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Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB03

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

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

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

Objection (maintained singularly and cumulatively) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.: Either:

- Delete the policies; or,
- Amend PB03 to delete mature trees and hedgerows from “irreplaceable habitats and important features”) and simplify PB08 and provide detailed, reasoned justification for analysis for the policy as written, and reconsult.

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Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

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

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

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

Objection (maintained) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.: Delete the policy, rely on statutory provisions and the NPPF, and focus on securing 10% BNG as required by statute.

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Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB04

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

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

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

Object Reasons: This policy has the potential to have significant implications for policy allocations within the Local Plan. It states that no development will be permitted where there is potential for increased vehicle numbers, resulting in unacceptable increases of emissions of nitrogen oxide and/or ammonia or other polluting emissions failing on designated sites. The policy refers to the Pebblebed Heaths Technical Assessment Report which confirms that development occurring through Local Plan policy as a whole, will result in unacceptable adverse impacts in the absence of mitigation. The conclusions of the Mitigation Strategy associated with this Report recommend the following:

1. That further work is conducted in regard to traffic and emissions modelling to enable mitigation to be specified in more detail, and the appropriate assessment to be completed.

2. More detailed mitigation measure design and sensitivity testing should be carried out to determine whether measures could be designed to be sufficient to avoid all Likely Significant Effects on the integrity of the Pebblebed Heaths SAC and SPA and if so, the Local Plan should be updated to require and enable such measures to be integrated into the plan at strategic level (i.e. via a levy per dwelling).

3. If development is able to fully mitigate any increase in air pollution impacts at habitat sites, this could waive a requirement to contribute to strategic level mitigation

4. If following completion of (2), the identified mitigation measures are found not to fully address the effects of the EDLP resulting in residual adverse effect to integrity, the Local Plan will need to be amended to eliminate this residual effect.

It is clear from the recommendations of this Strategy that there are uncertainties relating to allocations within the Local Plan, and in the absence of work to address these recommendations, the viability, capacity, and deliverability of the affected allocated sites is uncertain. Sites specifically referenced in the Local Plan as likely to be affected by the Pebblebed Heaths include:

1. WS06 (24.34ha employment land) – in Nitrate Vulnerable Zone
2. WS07 (15.3ha employment land) – in Nitrate Vulnerable Zone
3. WS08 (1ha employment land) – in Nitrate Vulnerable Zone
4. WS12 (0.7ha employment land) – in Impact Risk Zone The SA refers to “risks relating to recreation and air quality on European sites for all Options due to the proximity of the Pebblebed Heaths and Exe Estuary” stating that this has to be considered further by HRA. Furthermore, the SA refers to HRA and potential air quality impacts at East Devon Heaths SAC/SPA from increased traffic from nearly every proposed allocation¹. We do not contend that these allocations are undeliverable. The point is we do not know whether they are and neither does the Council; we certainly do not know the capacity of each site.

The Result of Transitional Arrangements and a Second Regulation 19 Plan The result is the Plan is neither legally compliant nor “sound” and it will have to go back to Regulation 18 stage. The Council will have to meet its “housing requirement based on the standard method using...ONS,” delivering housing and employment land in the right locations away from National Landscapes, in line with its SA and HRA.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.: Address the Air Quality Mitigation Strategy recommendations, amend the Local Plan after real consideration of the necessary mitigation for each of the affected allocations, allocate more land in the right locations in line with SA and HRA for housing and employment space and reconsult on the Local Plan going back to Regulation 18 stage.

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Other party name (if relevant): Stuart Partners Ltd

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB08

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

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

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

Objection (maintained singularly and cumulatively) Reasons (as per previous representations))

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.: Either:

- Delete the policy

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Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

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

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

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

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1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB04

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

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

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Object Reasons: This policy has the potential to have significant implications for policy allocations within the Local Plan. It states that no development will be permitted where there is potential for increased vehicle numbers, resulting in unacceptable increases of emissions of nitrogen oxide and/or ammonia or other polluting emissions failing on designated sites. The policy refers to the Pebblebed Heaths Technical Assessment Report which confirms that development occurring through Local Plan policy as a whole, will result in unacceptable adverse impacts in the absence of mitigation. The conclusions of the Mitigation Strategy associated with this Report recommend the following:

1. That further work is conducted in regard to traffic and emissions modelling to enable mitigation to be specified in more detail, and the appropriate assessment to be completed.
2. More detailed mitigation measure design and sensitivity testing should be carried out to determine whether measures could be designed to be sufficient to avoid all Likely Significant Effects on the integrity of the Pebblebed Heaths SAC and SPA and if so, the

Local Plan should be updated to require and enable such measures to be integrated into the plan at strategic level (i.e. via a levy per dwelling).

3. If development is able to fully mitigate any increase in air pollution impacts at habitat sites, this could waive a requirement to contribute to strategic level mitigation

4. If following completion of (2), the identified mitigation measures are found not to fully address the effects of the EDLP resulting in residual adverse effect to integrity, the Local Plan will need to be amended to eliminate this residual effect.

It is clear from the recommendations of this Strategy that there are uncertainties relating to allocations within the Local Plan, and in the absence of work to address these recommendations, the viability, capacity, and deliverability of the affected allocated sites is uncertain. Sites specifically referenced in the Local Plan as likely to be affected by the Pebblebed Heaths include:

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3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.: Address the Air

Quality Mitigation Strategy recommendations, amend the Local Plan after real consideration of the necessary mitigation for each of the affected allocations, allocate more land in the right locations in line with SA and HRA for housing and employment space and reconsult on the Local Plan going back to Regulation 18 stage.

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Other party name (if relevant): Stuart Partners Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS01

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

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

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

McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained singularly and cumulatively to policies) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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.: Either:

- Delete the policies and rely on Chapters 2, 6 and 8 of the NPPF;
- Delete the following aspects from the policies: o The onerous, unjustified, and unclear, requirements for schemes of over 200 houses and over 300 houses; o The onerous, unjustified, and unclear, requirements for schemes for non-residential uses.
- Provide detailed, reasoned justification for analysis for the policies as written and reconsult.

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Other party name (if relevant): Stuart Partners Ltd

Proposal: 14. Open Space and Sports and Recreation

1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OS02

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

3. Do you consider that this part of the Open Space and Sports and Recreation chapter is sound?: No

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

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Objection (maintained singularly and cumulatively) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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.: Either:

- Delete the policies and rely on Chapters 2, 6 and 8 of the NPPF;
- Delete the following aspects from the policies:
 - The onerous, unjustified, and unclear, requirements for schemes of over 200 houses and over 300 houses;
 - The onerous, unjustified, and unclear, requirements for schemes for non-residential uses.
- Provide detailed, reasoned justification for analysis for the policies as written and reconsult.

Full name: James McMurdo

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Other party name (if relevant): Stuart Partners Ltd

Proposal: 15. Our Outstanding Historic Environment

1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE01

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

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

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

McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Historic Environment 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 Our Outstanding Historic Environment 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.: Either:

- Delete the policies and rely on Chapter 16 of the NPPF;
- Amend the policies to mirror Chapter 16 of the NPPF;
- Provide detailed, reasoned justification for those aspects out of kilter with the Chapter 16 of the NPPF and reconsult.

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Proposal: 15. Our Outstanding Historic Environment

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE02

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

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

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

McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Historic Environment 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 Our Outstanding Historic Environment 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.: Either:

- Delete the policies and rely on Chapter 16 of the NPPF;
- Amend the policies to mirror Chapter 16 of the NPPF;
- Provide detailed, reasoned justification for those aspects out of kilter with the Chapter 16 of the NPPF and reconsult.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal: 15. Our Outstanding Historic Environment

1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE03

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

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

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

McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Historic Environment 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 Our Outstanding Historic Environment 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.: Either:

- Delete the policies and rely on Chapter 16 of the NPPF;
- Amend the policies to mirror Chapter 16 of the NPPF;
- Provide detailed, reasoned justification for those aspects out of kilter with the Chapter 16 of the NPPF and reconsult.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal: 15. Our Outstanding Historic Environment

1. To which part of the Our Outstanding Historic Environment chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HE04

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

3. Do you consider that this part of the Our Outstanding Historic Environment chapter is sound?: No

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

McMurdo Land Planning and Development Ltd on behalf of *** Personal details have been removed ***

Objection (maintained) Reasons (as per previously)

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Historic Environment 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 Our Outstanding Historic Environment 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.: Either:

- Delete the policies and rely on Chapter 16 of the NPPF;
- Amend the policies to mirror Chapter 16 of the NPPF;
- Provide detailed, reasoned justification for those aspects out of kilter with the Chapter 16 of the NPPF and reconsult.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CF02

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

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

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

Objection (maintained) Reasons (as per previous representations)

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

- Define “community facilities” and reconsult,
- Add another “test” to include such words.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal: 16. Community Facilities

1. To which part of the Community Facilities chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: CF02

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

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

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

Objection (maintained) Reasons (as per previously)

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

- Define “community facilities” and reconsult;
- Add another “test” to include such words.

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: James McMurdo

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

Other party name (if relevant): Stuart Partners 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.: SP06

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

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.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

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 Spatial Strategy 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.: Amend the policy to be flexible to ensure adequate housing and employment land is delivered and to comply with the NPPF

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

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 Spatial Strategy 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 non-strategic (i.e. small sites) from employment land allocations (many of which are not proven to be deliverable in any case) and
- Remove employment land allocations from national landscapes (which are not market facing in any case) and
- Allocate more employment land away from national landscapes and to meet EDDC's, and ECC's unmet, needs, on the area free from development constraints, the "West End" of the district, including expanding Hill Barton early in the plan period to meet clearly evidenced pent up demand in the logistics, waste, and energy sectors.²

² We will present detailed expert evidence on these matters as the plan progresses to EiP

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

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 Spatial Strategy 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 housing land allocations from national landscape areas (which are not market facing in any case) and
- Allocate more housing land away from national landscapes and to meet EDDC's and ECC's unmet needs, on the area free from development constraints, the "West End" of the district.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

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 Spatial Strategy 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 significant levels of housing and employment land allocations from national landscapes (which are not market facing in any case) and
- Reallocate the deleted allocation numbers from national landscapes to the “West End” of East Devon and
- Allocate additional housing and employment land away from national landscapes to meet Exeter’s unmet needs, on the area free from development constraints, the “West End” of the district.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Our client maintains objections to the Plan on these grounds for the same reasons as conveyed in our representations from March 2025 to the first Regulation 19 Plan, (housing land supply, employment land supply, allocations in conflict with the Sustainability Appraisal (SA) (and Habitats Regulation Assessment (HRA)) and duty to cooperate, broadly) and is still of the view that the Plan will have to go back to Regulation 18 stage, for the reasons set out.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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.: SP06

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

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.: McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***

Objection (maintained) Reasons (as per previous representations))

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 Spatial Strategy 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.: Amend the policy to be flexible to ensure adequate housing and employment land is delivered and to comply with the NPPF

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***

Objection (maintained) Reasons (as per previous representations))

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 Spatial Strategy 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 non-strategic (i.e. small sites) from employment land allocations (many of which are not proven to be deliverable in any case) and
- Remove employment land allocations from national landscapes (which are not market facing in any case) and
- Allocate more employment land away from national landscapes and to meet EDDC's, and ECC's unmet, needs, on the area free from development constraints, the "West End" of the district, including expanding Hill Barton early in the plan period to meet clearly evidenced pent up demand in the logistics, waste, and energy sectors.2

2. We will present detailed expert evidence on these matters as the plan progresses to EIP

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***

Objection (maintained) Reasons (as per previous representations))

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 Spatial Strategy 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 housing land allocations from national landscape areas (which are not market facing in any case) and

In line with the SA, allocate more housing land away from national landscapes and to meet EDDC's an ECC's unmet needs, on the area free from development constraints, the "West End" of the district

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***

Objection - (maintained) Reasons - (as per previous representations)

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 Spatial Strategy 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.: Suggested Amendments Required:

- Remove significant levels of housing and employment land allocations from national landscapes (which are not market facing in any case) and
- Reallocate the deleted allocation numbers from national landscapes to the “West End” of East Devon and
- Allocate additional housing and employment land away from national landscapes to meet Exeter’s unmet needs, on the area free from development constraints, the “West End” of the district.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning on behalf of Mr P and Mrs A Broom

Housing Delivery and 5 Year Housing Land Supply (5YHLS)

1. Our client maintains objections to the Plan on these grounds for the same reasons as conveyed in our representations from March 2025 to the first Regulation 19 Plan, (housing land supply, employment land supply, conflicts with Sustainability Appraisal (SA) and HRA, and duty to cooperate, broadly) and is still of the view that the Plan will have to be redrafted for the reasons set out therein.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

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.: WS09

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

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.:
McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

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.: Amend the policy so that the CVRP can be delivered as part of strategic development proposals at more intensive Masterplan stages, reviewed periodically.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

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.: WS01

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.:
Marlcombe

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.:
McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

- We endorse Turleys views on this as detailed in its representations made on behalf of our client and Bloor Homes (Exeter), in partnership (but please note what we say on Hill Barton in response to Policy SP04 above).

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

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.: WS09

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

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.:
McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***

Objection (maintained) Reasons (as per previous representations))

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.: Amend the policy so that the CVRP can be delivered as part of strategic development proposals at more intensive Masterplan stages, reviewed periodically.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

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.: WS09

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

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.: See first Regulation 19 representation.

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.: Amend the policy so that the CVRP can be delivered as part of development proposals at more intensive Masterplan stages, reviewed periodically.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal:

4. Development at the West End

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

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

4.1

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

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

1. McMurdo LPD Ltd (“McMurdo”) acts for Devon Air Ambulance Trust (DAAT) (“Client”), which controls land at Treasbeare Farm adjacent to Exeter Airport (please see Appendix 1).
2. The Council knows that DAAT is a charity that raises funds to keep Devon’s air ambulances (helicopters) flying and to keep Devon’s supplementary fleet of Critical Care Cars responding.
3. DAAT flew its first mission on the 27th of August 1992 and is now clinically independent and holds its own Air Operators Certificate.
4. Funded by the people of Devon, DAAT ensures that specialist skills get to where they are required. In a rural county with a unique geography and demographics, its role cannot be understated.
5. It currently operates from several locations which makes it unnecessarily more difficult for it to function efficiently. Understanding this, for some time it has wanted to bring together all core charity functions under one roof.
6. Following an extensive search for employment land (it is nigh impossible to find employment land in Exeter and East Devon), the only suitable land that has been made available to it is at Treasbeare Farm immediately adjacent to its current building at Exeter Airport.

7. It is now in preapplication discussions with East Devon District Council (EDDC) Officers to deliver extensions to its existing building there in addition to ancillary uses (e.g green infrastructure, SUDS, parking) on this land.

8. Though delayed, DAAT will submit a planning application in Spring 2026 for extensions to its building at Exeter Airport, into land at Treasbeare Farm together with green infrastructure which will be better than is currently proposed in the Local Plan and respectfully asks the Council to bear this in mind as its Local Plan progresses.

1. Our Client:

- Supports the overarching gist of the Local Plan to deliver jobs and infrastructure in the right locations but guided by sustainability work;
- Supports the concept of the Clyst Valley Regional Park (CVRP) and the delivery of SANGS;
- Objects to the CVRP policy as drafted.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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::
Exmo_20

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.:
McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Policy SD01 allocates Exmo_20 for social and community facilities, 700 homes and 2ha employment land. The north eastern part of Exmo_20 is within the Mineral safeguarding Area (MSA). Whilst the SA suggests that the presence of the MSA within this allocation is of limited concern, this conclusion fails to consider the buffer which will be required between any permanent development and any mineral working and the implications for site capacity and deliverability. It is relevant that Devon County Council (DCC) has objected to this allocation on the basis that it has the potential to sterilise underlying sand and gravel and constrain future working within parts of the MSA inconsistent with the NPPF and Devon Minerals Plan. Whilst DCC have recommended steps to address this concern, the policy amendments do not reflect these recommendations. Despite allocation, the deliverability and capacity of this site is questionable in the absence evidence to address DCC's objection

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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.:

Exmo_20

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

-

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.:

McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***

Minerals Policy SD01 allocates Exmo_20 for social and community facilities, 700 homes and 2ha employment land. The north eastern part of Exmo_20 is within the Mineral safeguarding Area (MSA). Whilst the SA suggests that the presence of the MSA within this allocation is of limited concern, this conclusion fails to consider the buffer which will be required between any permanent development and any mineral working and the implications for site capacity and deliverability. It is relevant that Devon County Council (DCC) has objected to this allocation on the basis that it has the potential to sterilise underlying sand and gravel and constrain future working within parts of the MSA

inconsistent with the NPPF and Devon Minerals Plan. Whilst DCC have recommended steps to address this concern, the policy amendments do not reflect these recommendations. Despite allocation, the deliverability and capacity of this site is questionable in the absence evidence to address DCC's objection.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Objection (maintained) Reasons (as per previous representations)

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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 Local Plan should state how it is going to viably deliver the affordable housing need of more than 8,000 houses (it has to address the current shortfall).

Allocate more housing land in the “West End” of the district to enable affordable housing delivery and reflect in other strategic policies.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners 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

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

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.: McMurdo Land Planning and development Ltd on behalf of *** Personal details have been removed ***
Objection (maintained) Reasons (as per previously)

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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 Local Plan should state how it is going to viably deliver the affordable housing need of more than 8,000 houses (it has to address the current shortfall).
- Allocate more housing land in the “West End” of the district to enable affordable housing delivery and reflect in other strategic policies.

Full name: James McMurdo

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

Other party name (if relevant): Stuart Partners Ltd

Proposal: Sustainability Appraisal

If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.: McMurdo Land Planning and Development Ltd on behalf of Stuart Partners Ltd.

Sustainability Appraisal (SA) The SA highlights significant constraints that effect a number of allocations identified within Chapter 5. Development in the Towns and Villages. The housing requirement supply figures identified by policy SP03 (Housing Requirement Figures for Designated Neighbourhood Areas) rely on the allocations identified within Chapter 5.

Landscape The SA includes a landscape objective to conserve and enhance the special qualities and distinctive character of landscapes, undeveloped coast, and seascapes. Policy SP02 has been appraised as having a “minor negative effect in contributing towards the achievement of the objective”. However, this “score” is applicable to policies affecting sites within the setting of National Landscapes (NL). Policies effecting sites within NL, are instead “scored” as likely to have “a major negative effect in contributing towards the achievement of the objective.” The housing requirement set by this policy is proposed to be met by a number of sites within NL, as such the accuracy of this overall “score” is questionable at best. In appraising the site allocations, a number of sites are, now (and only now), described as requiring considerable landscape mitigation and high quality design as a result of the site’s sensitivity, but that major/significant negative effects remain likely. This includes sites: Budl_02 (35 homes), Kilm_9b (23 homes), Kilm_10 (5 homes), Newt_04 (20 homes), Newt_05 (20 homes) and Otto_01 (10 homes). As such, the delivery and capacity of these allocations (equating to 113 homes) is far from certain. Site allocations Exmo_17 (410 homes), Gitti_05 (310 homes), Honi_07 (30 homes), Honi_13 (10 homes), Musb_01a (15 homes), Dunk_05 (43 homes), Ebud_01 (15 homes) and Sidm_34 (43 homes) are all within NL. Of these, Exmo_17 (410 homes) is dependent on an agreed Masterplan to demonstrate how development will be undertaken to conserve and enhance the NL, and the remaining 466 homes will require further detailed assessment to “maximise opportunities to conserve and enhance the National Landscape”. Despite allocation, the deliverability and capacity of these sites is questionable at best in the absence of detailed assessment of landscape impacts.

