

## Contents

7.1 - 7.13 .....	3
AR01 .....	5
AR02 .....	26
AR03 .....	43
AR05 .....	44

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

Filtered Data Export

## 7.1 - 7.13

**Full name:** Robin James Meadwell

**Proposal:**

7. Adapting to Climate Change

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

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

7.1 - 7.13

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

**2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?:** No

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

This chapter omits a number of other climate related issues and in particular there is no commentary relating to the increased vehicle numbers which will occur with a substantially increased population. There is also no reference to the increased domestic waste which will require treatment and disposal.

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** It may be helpful if this chapter cross-references the Mitigating Climate Change chapter, and vice-versa. Whilst this chapter does address the fundamental issues relating to flood risk and water usage, it does not address the issues of relating to the increased volume of vehicles which will arise with the substantial residential development proposed. It also does not address issues relating to increased domestic waste and how this would be disposed of or whether there would be any construction of Energy from Waste facilities (or similar). There are also no comments as to any alterations to existing infrastructure or new infrastructure requirements.

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

**Please be as precise as possible.:** It is for EDDC to thoroughly investigate and consider the numerous effects of significant developments on the region and climate more widely. The fact that there is no reference in this chapter to the substantial increase of vehicles and increases in domestic waste and how these issues will be managed is a serious omission and residents should be aware of EDDC's plans and proposals in this respect.

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

**4(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** This chapter does not address the numerous climate effecting issues which would be created by the significant volume of construction and substantial population increase.

**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)

## AR01

**Full name:** Dee Woods

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Whilst this addresses flooding and water availability and coastal change, it does not include other aspects of adaptation to living in a world of ongoing, increasing climate change implications. These include increases in extreme temperatures, more frequent and intense storms; changing rainfall patterns, changing seasonality and more. We would suggest: 'Building design, urban planning and green space provision needs to incorporate and address the changing climate, including living spaces designed for much hotter summers, provision of shade in all outdoor spaces, changes in use of outdoor spaces with changing weather patterns, resilience against increasing storminess, green areas that are much better adapted for our increasingly Mediterranean type climates.' Or perhaps, the sentence at the head of the Policy AR01 on flooding, should apply to all aspects of climate change and different weather patterns. Policy AR01 C is oddly worded: At C instead of 'ensuring ... space for the inclusion of SuDS' this should require the provision of SuDS, and include minimal hardstanding in development design, which must be permeable.

**Full name:** Dee Woods

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

**2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?:** No

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

Whilst this addresses flooding and water availability and coastal change, it does not include other aspects of adaptation to living in a world of ongoing, increasing climate change implications. These include increases in extreme temperatures, more frequent and intense storms; changing rainfall patterns, changing seasonality and more. We would suggest: 'Building design, urban planning and green space provision needs to incorporate and address the changing climate, including living spaces designed for much hotter summers, provision of shade in all outdoor spaces, changes in use of outdoor spaces with changing weather patterns, resilience against increasing storminess, green areas that are much better adapted for our increasingly Mediterranean type climates.' Or perhaps, the sentence at the head of the Policy AR01 on flooding, should apply to all aspects of climate change and different weather patterns. Policy AR01 C is oddly worded: At C instead of 'ensuring ... space for the inclusion of SuDS' this should require the provision of SuDS, and include minimal hardstanding in development design, which must be permeable. Water Quality and Supply -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** Policy AR01 C is oddly worded: At C instead of 'ensuring ... space for the inclusion of SuDS' this should require the provision of SuDS, and include minimal hardstanding in development design, which must be permeable.

**4. Do you consider that this part of the Adapting to Climate Change 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.:** We consider the climate emergency is the most important issue that needs to be addressed with the strongest possible policies and actions if we are to reach the net zero targets in time.

**Full name:** Iwan Easton

**Organisation (where relevant):** Boyer Planning

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** It is disappointing that the comments made during the previous Regulation 19 Consultation have not been addressed as part of this revised draft Local Plan. \*\*\* Personal details have been removed \*\*\* continues to object to the following criteria within this policy, which is not effective and therefore unsound:

Criterion a) requires development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location for development. Whilst it is acknowledged that this Draft LP is likely to be examined against the previous NPPF (2023), planning applications will be determined against their compliance with the most up to date NPPF and NPPG. In respect of sequential tests (ST), these are only required to be undertaken in instances where build development/land rising/access or egress/internal road layout are located within areas at risk of flooding (from all sources). A ST [sequential test] is not required where POS is located within areas at risk of flooding. We consider that additional clarity is required to ensure this policy is not ambiguous to the decision-maker and therefore effective and sound.

Criterion c) requires “ensuring that space is provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed by the ‘Sustainable Drainage System – Guidance for Devon’. Surface water run-off should be managed as close to the source as possible.”

The drainage guidance provided by DCC, however, states that there is no need for developments to deliver a lower greenfield run off rate.

The policy must be reworded accordingly, as currently worded it is not justified and not supported by proportionate or robust evidence.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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 policy must be reworded accordingly [see response at 3(b)], as currently worded it is not justified and not supported by proportionate or robust evidence.

**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.:** Our attendance is necessary to effectively discuss the points raised in these representations.

**Full name:** Iwan Easton

**Organisation (where relevant):** Boyer Planning

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

**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.:**  
Exmo\_20

**2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?:** No

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

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

2.35 3West object to the following criteria within this policy on the grounds that they are ineffective and therefore unsound. 3West is disappointed that the drafting of this policy has not been amended in response to a number of comments raised by respondents during the Phase 1 consultation, notwithstanding the concerns that were clearly expressed regarding its clarity, alignment with national policy, and practical implementation. Against this background, 3West maintains its objection to specific elements of the policy as set out below.

2.36 Criterion a) requires development proposed in areas at risk of flooding from any source to demonstrate that no sequentially preferable alternative site exists. While it is recognised that the Draft Local Plan may be examined against the 2023 NPPF, planning applications will be assessed against the most up-to-date NPPF and NPPG. In relation to the Sequential Test, this is only required where built development, land raising, access and egress, or internal road layouts are located within areas of flood risk from any source. The Sequential Test is not required where only public open space is proposed within areas at risk of flooding. Greater clarity is therefore needed to avoid ambiguity for decision-makers and to ensure the policy is effective and sound.

2.37 Criterion c) requires development sites to provide space for SuDS designed to reduce the volume and rate of surface water runoff to below greenfield rates, in accordance with the Sustainable Drainage Systems – Guidance for Devon, and to manage runoff as close to source as possible. However, Devon County Council guidance confirms that developments are not required to achieve runoff rates lower than greenfield levels.

2.38 3West Developments therefore consider that the policy is unsound as currently worded, as in its current form it is not justified and is not supported by proportionate or robust evidence.

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

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** 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.:** Our attendance is necessary to effectively discuss the points raised in these representations.

**Full name:** Iwan Easton

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy AR01: Flooding

2.34 Vistry consider that Strategic Policy AR01 is unjustified.

2.35 Criterion a) requires applications for development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location for development and, if necessary, that development complies with the exception test (unless this has been undertaken through a site allocation within the emerging local plan). To ensure that criterion a) is consistent with national policy and the NPPF, we consider that additional clarity is required to ensure that this policy is not ambiguous to the decision-maker, and that planning applications will be determined against their compliance with the most up to date National Guidance and Planning Practice Guidance (PPG). We propose that the policy wording is reworded accordingly to ensure it is clear that ST are not required where development/land rising/access or egress/internal road layout is located within areas at risk of flooding.

2.36 Criterion c) requires space to be provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed by the 'Sustainable Drainage System – Guidance for Devon'. Guidance provided by DCC does not require development to deliver a lower greenfield run off rate, and as a result the current policy wording is unjustified and not supported by proportionate or robust evidence. The policy wording must be reworded to clarify that existing greenfield run off rates are not required to be exceeded, as delivering a betterment is not a requirement from DCC.

2.37 The proposed policy wording continues to lack flexibility and is overly onerous to the development industry, without appropriate justification. Additional amendments are therefore required to the proposed policy text to ensure that there is flexibility and is appropriately justified.

**Full name:** Neil Mantell

**Organisation (where relevant):** LRM Planning

**Other party name (if relevant):** The Cherwell Group

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** The Cherwell Group objects to Strategic Policy AR01, as they consider that it is not a justified proposition. Specifically, their concerns are: ? As drafted, the Policy seeks to ensure that space is provided on all developments for the inclusion of surface water drainage systems that are designed to reduce the volume and run off rate to less than greenfield run off rates. The Devon County Council Guidance is highlighted as providing the justification for this requirement. However, it appears that the Guidance has been misunderstood. Instead, the Guidance states that development “runoff rates post development should never exceed greenfield runoff rates for the same return period event<sup>34</sup>” (our emphasis) rather than ensuring rates are less than the greenfield runoff rate. ? In addition, other than in circumstances where infiltration and soakaways are provided, it will not be practicable to reduce the volume of runoff to below that of a greenfield site. This is reflected in guidance provided by Devon County Council, which states that “for developments on greenfield sites, the volume of surface water runoff discharged off-site in the 1 in 100 year, 6 hour rainfall event, must never exceed the greenfield runoff volume for the same event<sup>35</sup>.” Such an approach relies upon ‘long term storage,’ which is a very different calculation to the proposed policy wording.

7.23 In addition to the above, the Local Planning Authority should also consider how limb (a) of the emerging Policy accords with para. 175 of the December 2024 version of the NPPF. The paragraph confirms that sequential tests are not required in scenarios where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of

flooding from any source, now and in the future (having regard to potential changes in flood risk). In addition, the Cherwell Group note that the PPG confirms<sup>36</sup> that when applying para. 175 of the NPPF “a proportionate approach should be taken.”

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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 changes

7.24 To remedy these soundness concerns, the Policy should be reworded as follows:

“A. Requiring applicants for development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location, unless a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk). If necessary, that development complies with the an exception test will also be required. This Policy will not apply to where unless this has been undertaken through a site allocation in this plan. In applying this Policy, a proportionate approach will be undertaken...” “C. Ensuring that space is provided on all development sites for the inclusion of SuDS designed to ensure rates of runoff do not exceed greenfield rates and that runoff volumes are managed in accordance with the latest guidance issued by the Lead Local Flood Authority.” reduce the volume and rate of runoff to less than greenfield rates, as informed by the ‘Sustainable Drainage System – Guidance for Devon’<sup>31</sup>. Surface water run-off should be managed as close to the source as possible. Systems should reduce pollution risks and contribute to the conservation and enhancement of biodiversity, water quality and GI where practicable...”

**Full name:** Nick Matthews

**Organisation (where relevant):** Savills

**Other party name (if relevant):** Mac Mic Strategic Land

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Savills on behalf of Mac Mic Strategic Land

Criterion A of Strategic Policy AR01 seeks to apply the sequential and exception tests to all development proposals in areas at risk of flooding from any source. Whilst that very strict policy approach was consistent with the previous version of the Framework, in December 2024 there was a change to paragraph 175 which updated the approach to the sequential test. This is copied below for convenience:

“The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).”

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** We understand that further changes to the related section of the Planning Practice Guidance on Flood Risk are also due to be published imminently. Once this has been published a full review of Strategic Policy AR01 should

be undertaken to ensure that it is compatible with the most up to date national policy and guidance.

**Full name:** Dan Yeates

**Organisation (where relevant):** Savills

**Other party name (if relevant):** 3West Developments Ltd

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

**2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:** Strategic Policy AR01: Flooding Whilst a few minor changes have been made to this draft policy since the first Regulation consultation draft, we are concerned that the draft policy remains inconsistent with the provisions of the latest NPPF, notably paragraph 175 which updated the approach to the sequential test. This is copied below for convenience: “The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).” Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy AR01: Flooding Whilst a few minor changes have been made to this draft policy since the first Regulation consultation draft, we are concerned that the draft policy remains inconsistent with the provisions of the latest NPPF, notably paragraph 175 which updated the approach to the sequential test. This is copied below for convenience: “The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).” Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

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

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** 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.:** In order to represent the interests of 3West Group in relation to their interests in the Land north and east of Exton Farm (Wood\_28), and other draft policies in the plan.

**Full name:** Dan Yeates

**Organisation (where relevant):** Savills

**Other party name (if relevant):** Sidbury Manor Estate

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

**2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?:** No

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Whilst a few minor changes have been made to this draft policy since the first Regulation consultation draft, we are concerned that the draft policy remains inconsistent with the provisions of the latest NPPF, notably paragraph 175 which updated the approach to the sequential test. This is copied below for convenience: “The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).” Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

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

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** 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.:** In order to represent the interests of The Sidbury Manor Estate in relation to their interests in the Land west of Two Bridges Road, Sidford (Sidm\_06a), and other draft policies in the plan.

**Full name:** Dan Yeates

**Organisation (where relevant):** Savills

**Other party name (if relevant):** Sidbury Manor Estate

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Whilst a few minor changes have been made to this draft policy since the first Regulation consultation draft, we are concerned that the draft policy remains inconsistent with the provisions of the latest NPPF, notably paragraph 175 which updated the approach to the sequential test. This is copied below for convenience: “The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).” Given the recent changes to the NPPF and the more recent changes to the Planning Practice Guidance on Flood Risk, it is clear that draft Policy AR01 should be reviewed and amended to ensure consistency with the most up to date national policy and guidance.

**Full name:** Margaret Leppard

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Note that geotextile wrapped attenuation tanks are a source of PFAS (Forever chemicals) to environment

**Full name:** Margaret Leppard

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Risk zones relate to fluvial flooding only. Surface water flooding can occur outside EA defined fluvial risk area. When multiple SUDS along a watercourse are likely to increase flooding down stream see CIRIA SUDS Manual.

**Full name:** Rachel Danemann

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR01

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** To be effective it should be clearer how this policy links into BNG, particularly the potential development of off-site BNG units.

## AR02

**Full name:** Dee Woods

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Water Quality and Supply - We welcome the inclusion of paragraph 7.4 and recognition that the river Otter is at a high risk of high nutrient loading from future development. In fact the WCS provides evidence that this is the case already with several waste water facilities, such as Honiton, Feniton and Fluxton being at over capacity in dry weather. Policy AR02 has been greatly improved in order to provide a framework for water protection. At AR02 C: suggest delete the current words and add: 'All developments should implement the most effective water efficiency etc measures'. This would make the policy even stronger.

**Full name:** Dee Woods

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

**2. Do you consider that this part of the Adapting to Climate Change chapter is legally compliant?:** No

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

We welcome the inclusion of paragraph 7.4 and recognition that the river Otter is at a high risk of high nutrient loading from future development. In fact the WCS provides evidence that this is the case already with several waste water facilities, such as Honiton, Feniton and Fluxton being at over capacity in dry weather. Policy AR02 has been greatly improved in order to provide a framework for water protection. At AR02 C: suggest delete the current words and add: 'All developments should implement the most effective water efficiency etc measures'. This would make the policy even stronger. Coastal change and erosion needs a clear statement that no development should take place on areas likely to be required for the rollback from vulnerable coastal areas and to enable natural processes for biodiversity and flood management. Policy AR02 has been greatly improved in order to provide a framework for water protection.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** At AR02 C: suggest

delete the current words and add: 'All developments should implement the most effective water efficiency etc measures'. This would make the policy even stronger. Coastal change and erosion needs a clear statement that no development should take place on areas likely to be required for the rollback from vulnerable coastal areas and to enable natural processes for biodiversity and flood management.

**4. Do you consider that this part of the Adapting to Climate Change 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.:** We consider the climate emergency is the most important issue that needs to be addressed with the strongest possible policies and actions if we are to reach the net zero targets in time.

**Full name:** Hilary Johnson

**Organisation (where relevant):** Dorset Council

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Part A of Strategic Policy AR02 appears restrictive where impacts on water quality arise from constrained wastewater and water supply infrastructure that is outside developer control. While this is noted, Dorset Council does not consider it necessary to comment formally on this policy.

**Full name:** Iwan Easton

**Organisation (where relevant):** Boyer Planning

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy AR02 has been amended to include a number of criteria that must be met in order to protect, manage and improve water quality in East Devon. Criterion C states that all homes must meet the optional Building Regulation G2 standards of 110 litres per day. Supporting policy text states that the water cycle study provides clear evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress.

The Water Cycle Study in the Evidence Base, however, states that the per capita consumption should be reduced to 122l/h/d by 2038 and 110 l/h/d by 2050. The policy should be reworded to state that the per capita consumption is 120 l/h/d, in accordance with the Draft LP evidence base.

Furthermore, East Devon is not classified as a water stress area, posing questions about the justification for imposing limits on water usage. Water consumption is a matter already covered by the Buildings Regulations Regime, making a specific plan policy on this matter unjustified.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** [As per response to 3(b) - ] The policy should be reworded to state that the per capita consumption is 120 l/h/d, in accordance with the Draft LP evidence base. Water consumption is a matter already covered by the Buildings Regulations Regime, making a specific plan policy on this matter unjustified.

**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.:** Our attendance is necessary to effectively discuss the points raised in these representations.

**Full name:** Iwan Easton

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** The policy amendment is not supported by proportionate evidence. Previous comments raised by Vistry have not been considered with the amendments made to the Draft LP wording. Vistry therefore still consider that Strategic Policy AR02 is unjustified for the following reasons:

- East Devon is not considered a water stress area, and therefore the requirement for a specific plan policy on water quality and efficiency is considered to be unjustified.
- Criterion C requires homes to meet the Building Regulation G2 standards of 110 l/h/d, with supporting evidence referencing the accompanying Water Cycle Study. On review of the Water Cycle Study, this states that the per capita consumption should be reduced to 122 l/h/d by 2038 and 110 l/h/d by 2050.
- Vistry consider that the proposed policy text should be consistent with current Building Regulations G2 and the water efficiency standard of 125 litres per day to ensure the policy is not unsound. A lower water efficiency standard of 110 l/h/d is not supported by evidence.

2.41 Any requirements regarding water quality should be consistent with national policy, which in this case paragraph 180e) the NPPF requires planning policies and decisions to prevent: “new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans”.

2.42 The policy text should be amended to state that developers cannot impose water usage restrictions, and that developers can only install and encourage occupiers to adopt water efficient methods post-occupation. In addition, the Draft LP text should be updated in accordance with Building Regulations G2 and the water efficiency standard of 125 litres per day.

**Full name:** Iwan Easton

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Vistry Group

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy AR02: Water Quality and Efficiency

2.38 Additional text has been included within Strategic Policy AR02 to ensure the policy is in accordance with the resolution of the 2nd September 2025 Strategic Planning Committee (SPC) that “the update on the Water Cycle Study be noted and to include a strategic policy on water quality, as generally described in paragraph 6.3 of this report, the details of which would be finalised following the completion of the water cycle study be agreed.”

2.39 Concerns were raised at the SPC that collectively policies within the Local Plan required improvements to water quality, there was no overarching policy bringing these requirements together, and would likely include:

- A requirement for major development proposals to demonstrate what measures can reasonably be taken to enhance the water environment;
- A requirement for development to make adequate provision of water services including timely provision of foul water so that development does not overload the sewer network;
- The phasing of development to ensure the avoidance or mitigation of any adverse impacts to residents on water supply or wastewater infrastructure; Page 11 EDDC Second Regulation 19 Consultation: Representations | Land at Addlepool Farm
- Provision of appropriate surface water drainage and disposal; and

- Measures to protect aquifers and Source Protection Zones.

**Full name:** Laura Grimason

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

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

**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 Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Strategic Policy AR02: Water efficiency This policy seeks to secure for all development, the Optional Technical Housing Standard of 110 litres per person per day for water efficiency. We object to this point of policy AR02. 5 East Devon is not a water stress area so the justification for limiting water usage for new development is questionable. Water consumption is a matter covered by the Buildings Regulations regime. This limits water consumption to 125 litres per person per day. A local plan policy on water efficiency is unnecessary.

**Full name:** Margaret Leppard

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:** I

appreciate the rewording here to make AR2 much more proactive. EDDC should apply the Grampian condition robustly without ‘fear or favour’

**Full name:** Rachel Danemann

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy.

We note that the issue of water quality has been added to this policy between the first and the second Reg 19 consultation. We would argue that this is significant new policy area that being brought into the scope of the East Devon Local Plan, and note that new requirement that applies to all applications across East Devon, and as such cannot reasonably be characterised as a simple update to the first Reg 19 to simply change the references about the new community to Marlcombe new community now it has a name. This represents an example of one of the more significant changes to wider policies being introduced into this second Reg 19 consultation.

HBF provided comments during the first Reg 19 consultation that we did not support the policy which seeks to require development to ensure an estimated water consumption of no more than 110 litres/person/day. HBF do not believe such a policy is needed in the Local Plan because current Part G Building Regulations require 125 litres per day, and house builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. We continue to believe that there is no need for Local Plan policies to repeat Building Regulations and it is in fact unhelpful to do so as Building Regulations may change during the course of the plan period, and that as such the policy should be deleted.

The second Reg 19 consultation, however, had added further requirements to the policy. Seeking to require developers to show that there is adequate water and waste water infrastructure to serve development. The implication being that if capacity constraints are identified development must not commence until the delivery of sufficient new or upgraded infrastructure. HBF agrees that there must be sufficient water and waste water treatment capacity to serve new development however this is for the Council and water company to determine as part of the preparation of this Local Plan and the through the Water Resource Management Plan. It cannot be left to the development management process to assess on a case-by-case basis. If there is insufficient water or waste water treatment capacity to address the needs of development in future, then the only assumption must be that the plan is not deliverable over the plan period and as such unsound.

Under the Wastewater Infrastructure section of CE8 the Council will require applicants for major development to be supported by a sewage capacity assessment. HBF do not consider this to be necessary as the capacity of the sewage network are not a land use planning matter for consideration on an application-by-application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

“S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker’s water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.”

Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the

public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.

Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see *Barratt versus Welsh Water* [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

“The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an “absolute right”. The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in *Ainley v Kirk-heaton Local Board* (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be pre-vented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse.”

Consequently, it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide water supply and wastewater connections as they are an attempt to get applicants to do things for which they are not legally responsible. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to supply those needs, this needs to be disclosed in the Water Resource Management Plan (WRMP). HBF recognises that this could represent a significant barrier to the delivery of the local plan, but it should not be addressed through capacity assessment by new development but through plan making and the new text proposed in the second Reg 19 consultation should be deleted.

Although we strongly believe that this policy is entirely inappropriate for inclusion in the East Devon Local Plan if it were to be retained the wording must be improved. Between the first and the second Reg 19 versions of this Plan the Council has the requirement to secure 110 per person per day has been changed to now say ‘at least’. This does not

provide the certainty developers need, and the cumulative impact of all the changes to the DM policies now being proposed needs to be subject to up-dated and robust viability testing.

Similarly, it is unclear how a developer would should compliance with further new wording to the policy that has been added between Reg 19 version 1 and Reg 19 version 2 as rather than requirement to be minimised, the policy wording now requires the protection, management and improvements in all water bodies affected. It is unclear how this requirement links back directly to the impact of development, and the policy would need to be much more clearly defined in order for a developer to be able to show compliance with it. However we continue to object to the soundness of the inclusion of a policy on this matter in the Local Plan in the first place as this issue is already properly covered through Building Regulations.

The Dec 2025 NPPF clearly sets out the Government’s intention to move towards a new more rules-based approach for decision-making with consistency across standard common matters being provided at the national level. The consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b. The proposals clearly set out that the Government view is that any Local Policies which conflict with the new NPPF should not be able to be taken into account in decision-making. This adds further weight to our concerns about this policy, and we would also observe that it seems likely under the current Government Plans that this policy and other similar ones being proposed as part of the suite of Development Management policies are likely to be replaced and/or made redundant by those in the new NPPF. We continue to support the deletion of this policy.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** Although we strongly believe that this policy is entirely inappropriate for inclusion in the East Devon Local Plan if it were to be retained the wording must be improved. Between the first and the second Reg 19 versions of this Plan the Council has the requirement to secure 110 per person per day has been changed to now say ‘at least’. This does not provide the certainty developers need, and

the cumulative impact of all the changes to the DM policies now being proposed needs to be subject to up-dated and robust viability testing.

the policy wording now requires the protection, management and improvements in all water bodies affected. It is unclear how this requirement links back directly to the impact of development, and the policy would need to be much more clearly defined in order for a developer to be able to show compliance with it.

However we continue to object to the soundness of the inclusion of a policy on this matter in the Local Plan in the first place as this issue is already properly covered through Building Regulations.

We continue to support the deletion of this policy.

## AR03

**Full name:** Dee Woods

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR03

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

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

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** Coastal change and erosion needs a clear statement that no development should take place on areas likely to be required for the rollback from vulnerable coastal areas and to enable natural processes for biodiversity and flood management.

## AR05

**Full name:** Kim Miller

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

**Proposal:**

7. Adapting to Climate Change

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

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR05

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

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Adapting to Climate Change chapter, please use this box to set out your comments.:** We note and welcome the additional text at paragraph 7.13 highlighting that in cases that may affect the Jurassic Coast World Heritage Site will also need to meet the requirements of Policy PB10. This addresses our comment on the Regulation 19 Local Plan.