



**East Devon Local Plan**  
Publication Stage (Regulation 19  
Stage 2) Representation Form

Ref:

**(For official  
use only)**

**Name of the Local Plan to which this representation relates:** East Devon Local Plan 2020-2042

Please return to East Devon District Council, Local Plans Team, Blackdown House, Border Road, Honiton, EX14 1EJ, upload onto our consultation portal at:

<https://eastdevonlocalplansecondreg19.commonplace.is>

or email: [localplan@eastdevon.gov.uk](mailto:localplan@eastdevon.gov.uk) by **26th January 2026**

## Part B – Representation

Please use a separate sheet for each representation

1(a). To which part of the East Devon Local Plan does this representation relate? Please write down the paragraph or policy number that your representation relates to.

Paragraph

4.44 to 4.45

Policy

WS10

Policies Map

1(b). Does your comment relate to one of the changes made to the first Regulation 19 plan?

Yes

No

**Please note** if you responded to the first regulation 19 consultation in early 2025, those representations remain valid and will be submitted to the Planning Inspector. **Do not resubmit previous comments.** Only make new representations if you are commenting on the specific changes listed in the Schedule of Changes, or if you did not respond to the first consultation.

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

Site Ref

2. Do you consider that this part of the East Devon Local Plan is legally compliant

Yes

No

2 (a). If yes, and you wish to support the legal compliance of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

2 (b). If no, please give details of why you consider this part of the East Devon Local Plan is not legally compliant. Please be as precise as possible.  
(Continue on a separate sheet if necessary)

2 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the East Devon Local Plan 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.  
(Continue on a separate sheet if necessary)

3. Do you consider that this part of the East Devon Local Plan is Sound?

Yes       No

3 (a). If yes, and you wish to support the soundness of this part of the East Devon Local Plan, please use this box to set out your comments.  
(Continue on a separate sheet if necessary)

3 (b). If no, please give details of why you consider this part of the East Devon Local Plan is unsound. Please be as precise as possible.

### **Strategic Policy WS10: Development next to the M5 and north of Topsham**

The allocation of the urban extension to the north of Topsham for mixed use development continues to be supported. From a sustainability perspective, we would agree that an urban extension to Exeter and Topsham, and the access to the wide range of services and facilities that the City provides, is one of the most sustainable options for the Local Plan in delivering strategic planned growth. It also does not carry the infrastructure burdens or the associated long delivery lead-in times of the new community at Marcombe.

Whilst we agree master planning will be an important element in ensuring development can come forward in a comprehensive and planned way we do consider the proposed wording of the policy remains too negative in respect of release of individual sites and support for a phased approach. Any masterplanning work should be developed in conjunction with landowners and site promoters to ensure it is effective and proportionate. It is also important that it does not unnecessarily hold up delivery.

Our client's site at Land at Clyst Road forms the southern most element of the allocation, although it also has a strong relationship with the adjoining consented sites to the west and forms the next logical phase of the development currently being built out. It represents a relatively small element of the land allocated at north Topsham and the delivery of that wider strategic allocation is not dependent on it. In these circumstances there is no reason why that site could not come forward as an early phase, provided it demonstrates it will not prejudice the delivery of the wider area (which should be the key test for any phase). A Framework masterplan has previously been provided to the Council that demonstrates that would not be the case.

There are clear benefits to this approach in that it enables elements of the allocation to be delivered as early phases to support Plan resilience and early housing delivery. It will begin to establish key principles and a direction of travel for the remainder of the allocation as well as building confidence in the Plan strategy.

Whilst it is noted that Exeter City Council are referenced as needing to be jointly involved in respect of a Development and Infrastructure Delivery Framework, the need for this is questioned given the adjoining sites within the ECC area all have consent and are being delivered.

3 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East Devon Local Plan 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.

(Continue on a separate sheet if necessary)

As set out above we remain generally supportive of Policy WS10 but are concerned as currently written it does rule out a more phased and flexible approach and early delivery. The allocation wording should be modified to not rule out individual site release as a matter of principle. Instead wording requiring individual elements to demonstrate that they would not prejudice the delivery of the wider area would be more appropriate.

Furthermore, we would suggest clarification is required in terms of ECC's role in a Development and Infrastructure Delivery Framework, given the limited influence this can now have on what are now committed sites under construction.

4. Do you consider that this part of the East Devon Local Plan complies with the Duty to Co-operate?

Yes  No

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

(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the East Devon Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.  
(Continue on a separate sheet if necessary)

**Please note** that non-compliance with the duty to co-operate is incapable of modification at examination.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

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)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

To elaborate further on these and previous representations made on the Plan, including providing evidence to support the necessary Modification of the Plan.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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<https://www.commonplace.is/privacy-policy>

7. 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.

(Continue on a separate sheet if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***