



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 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

WS10

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 same extent of infrastructure burdens or the associated long delivery lead-in times of the new community at Marcombe.

Whilst we agree masterplanning 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 should be effective, proportionate and should not unnecessarily hold up delivery.

The site has already been the subject of framework master planning and visioning and being identified as a single strategic allocation will provide a further framework for decision-making in respect of key delivery and infrastructure matters. Furthermore, technical work to underpin an outline planning application (to be submitted within the next few months) demonstrates that there are no inherent technical constraints to development.

However, the policy is worded in a way that would appear to require all unknowns and uncertainties to have been fully addressed prior to any part of the site being considered, including relying on the Council and Exeter City Council to have collaborated over a Development and Infrastructure Delivery Framework. This all points to the potential for significant delay and the lack of delivery. It should also be noted that phases 1 and 2 of the Taylor Wimpey scheme at Clyst Road within the Exeter City administrative boundary are either complete or committed and therefore Exeter's interest and the need for collaboration would appear to be very limited.

It is important for overall Plan resilience, that whilst masterplanning will be required, development should be able to proceed in phases where it is demonstrated that it would not prejudice the delivery of the wider site (for example, by ensuring proper connections are made to land ownership boundaries and making appropriate contributions to infrastructure etc). It is often the planning application process that provides the certainty regarding the likely final form of development (including quantity, land uses, and S106 obligations) and therefore assists in establishing the apportionment of costs and infrastructure requirements through collaboration agreements between developers.

Therefore, any masterplanning and delivery framework will need to be undertaken in conjunction with the site promoters and be proportionate. It should aim to provide high level principles to aid a phased approach rather than rule out flexibility that is often key to the delivery of a strategic allocation. Each subsequent application would then need to demonstrate how it does not prejudice the delivery of the wider allocation.

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.

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.

For more information on how we use your data – please read the privacy notices at the following

links: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notice>

<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.