



**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

4.5 to 4.8f

Policy

WS01

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 WS01: Development of Marlcombe new community east of Exeter**

Although additions have been made to the original Regulation 19 version of Policy WS01, none of these provide any further justification for assuming the delivery of around 3,300 new homes within the Plan Period is likely to be achievable. We previously raised the need to consider the lessons of Cranbrook and long lead in times to establish land assembly and infrastructure planning when considering how much reliance should be placed on the new community within the emerging Local Plan.

It remains highly ambitious to expect that level of delivery within the Plan period when only broad technical feasibility, visioning and masterplanning have been undertaken with little known about viability, infrastructure requirements and the phasing and delivery process. The Infrastructure Delivery Plan is simply a wish list without any examination of priorities, delivery mechanisms or any indication how the necessary infrastructure will be in place to support the delivery of 3,300 new homes by 2042. Instead, the more critical matters are simply deferred for subsequent consideration as part of a (to be developed) Infrastructure Delivery Strategy.

(Continue on a separate sheet if necessary)

This renders the approach of the Plan as ineffective and unjustified.

Whilst it is accepted that the evidence base and approach in respect of the delivery of Marlcombe will develop over time given its clear long-term delivery beyond the Plan period, there is still a requirement for the Plan to sufficiently demonstrate with certainty that housing delivery assumptions within the Plan period can be realistically met. This is still noticeably absent from the Plan.

Changes introduced to the policy text within the Part 2 Regulation 19 consultation to reflect further broad requirements including increased levels of affordable housing and higher densities within the town centres etc are likely to impose further delivery obstacles.

It is therefore highly likely that over reliance on delivery at Marlcombe will place additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory. Over assumptions of delivery across a narrower range of complex sites can only result in under supply and not meeting need.

Whilst it is correct that Marlcombe will have an important role in the future, it is not there yet in terms of certainty of detail and early delivery and should not be used to underpin this Plan's strategy as a consequence. Instead, this Plan's strategy should be based on a range of sites that includes maximising opportunities early in the Plan period and the delivery of sites less burdened by constraints and infrastructure capacity issues and requirements. Where any delivery from Marlcombe is relied upon this should be clearly evidenced and justified to provide sufficient certainty that this is achievable in the Plan period.

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)

It is important that the housing delivery rate assumed from Marlcombe within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from Marlcombe and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

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)

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**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.**