



**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**

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s): Please fill in a separate sheet for each representation you wish to make.

## Part A: Personal details

### 1. Personal details

Full name

Mr Alistair Macdonald

Are you acting as an agent for  
another party?

Yes

Organisation (where relevant)

Persimmon Homes South West

Address line 1

Blue Fox Planning Ltd

Address line 2

Bowman Court

Address line 3

Royal Wootton Bassett

Postcode

SN4 7DB

Email address

alistairmacdonald@bluefoxplanning.co.uk

## Part B – Representation

Please use a separate sheet for each representation

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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

PB05

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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

Sidm\_01

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)

See accompanying report for full representation

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)

See accompanying report for full representation

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)

See accompanying report for full representation

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)

Please see 4 (b) below and accompanying report

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.

(Continue on a separate sheet if necessary)

See accompanying report for full representation

- The LPA's consultation response to the first regulation 19 consultation, fails to establish the position of the authority on the matters raised, and does not provide clear reasoning or justification as to the changes made to the plan as a result of the comments.
- We continue to object to the provisions of Strategic Policy PB05, which require the delivery of 20% BNG. There is no justification for this amount and given the absence of clarify the policy should adopt a minimum target of 10% BNG in accordance with the Environment Act 2021. Any exceedance of the target prescribed by the aforementioned Act is likely to cause wider viability and delivery issues for this site and other proposed allocations.

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)

See accompanying report for full representation

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)

See accompanying report for full representation

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)

See accompanying report for full representation

**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)

Persimmon is a national house builder and has vast experience in delivering new homes across the country.

Persimmon also owns the Land south west of Woolbrook (Sidm\_01) allocation which is intended to deliver the majority of new homes identified for the Town and it is therefore considered that Persimmon's participation at the Hearing Sessions would be useful for the appointed Inspector(s).

**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)

See accompanying report for full representation

**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.**