

# East Devon Local Plan – Duty to Co-operate

## Draft Statement of Common Ground on Housing, Employment and Site Allocations

Second Regulation 19 consultation version 01



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Cover photo: Sky Park under construction

Version	By	Date	Changes
V.01	EDDC	10/12/25	Draft for SoCG bodies to review with 2 <sup>nd</sup> Reg. 19 Local Plan

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## 1 Introduction

- 1.1 This is a Statement of Common Ground (SoCG) on, housing, employment and site allocation matters that has been produced to support the second Regulation 19 version of the East Devon Local Plan 2020 to 2042. It is supported by and should be read with the Statement of Compliance with the Duty to Co-operate<sup>1</sup>.
- 1.2 Two other SoCG have been prepared: transportation and environment/infrastructure.
- 1.3 This SoCG is structured so that the issues and parties involved are listed, followed by a map and text describing the relevant strategic geography. Each strategic matter is summarised, together with a list of the evidence base, where agreement has been reached, any areas of disagreement and any need for ongoing co-operation.

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<sup>1</sup> [Evidence and Examination Library - Key Supporting Documents \(KSD\) - East Devon](#)

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## 2 List of parties involved and signatures

2.1 This draft Statement of Common Ground confirms areas of agreement and outstanding issues between the parties below and East Devon District Council in relation to the East Devon Local Plan 2020-2042. This is a draft SoCG that will be reviewed prior to the submission of the local plan for examination so no signatures are required at this stage.

2.2 The bodies that are relevant to this SoCG are:

- East Devon District Council (East Devon or EDDC)
- Dorset Council (Dorset or DC)
- Somerset Council (Somerset or SC)
- Mid Devon District Council (Mid Devon or MDDC)
- Exeter City Council (Exeter or ECC)
- Teignbridge District Council (Teignbridge or TDC)
- Torbay Council (Torbay or TC)
- Devon County Council (DCC)
- National Highways (NH)
- Environment Agency (EA)
- Natural England (NE)
- National Health Service (NHS)<sup>2</sup>.

2.3 This SoCG covers the following strategic matters: housing; employment and allocations. The matters are divided into the following issues.

- H01 – Meeting the East Devon Housing Requirement
- H02 – Meeting the housing requirements of other local planning authorities

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<sup>2</sup> NHS Devon Integrated Care Board and Royal Devon University Healthcare NHS Foundation Trust

- H03 – Meeting the Gypsy and Traveller requirement
- E01 – Meeting East Devon employment needs
- E02 – Meeting the employment needs of others
- A01 – Cross boundary impacts of Marcombe
- A02 - Cross boundary impacts of North of Topsham mixed use allocation.

2.4 Table 1 indicates which bodies are involved in the matters considered in this SoCG.

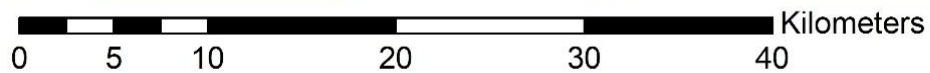
Table 1 – Bodies relevant to issues							
Body	Issue						
	H01	H02	H03	E01	E02	A01	A02
DC	X	X	X	X			
SC	X	X	X	X			
MDDC	X	X	X	X			
ECC	X	X	X	X	X	X	X
TDC	X	X	X	X			
TC		X					
DCC			X			X	X
NH						X	X
EA						X	X
NE						X	X
NHS						X	X
HE						X	

### 3 Strategic Geography

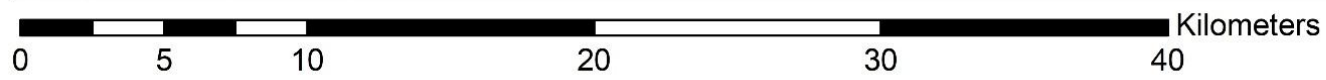
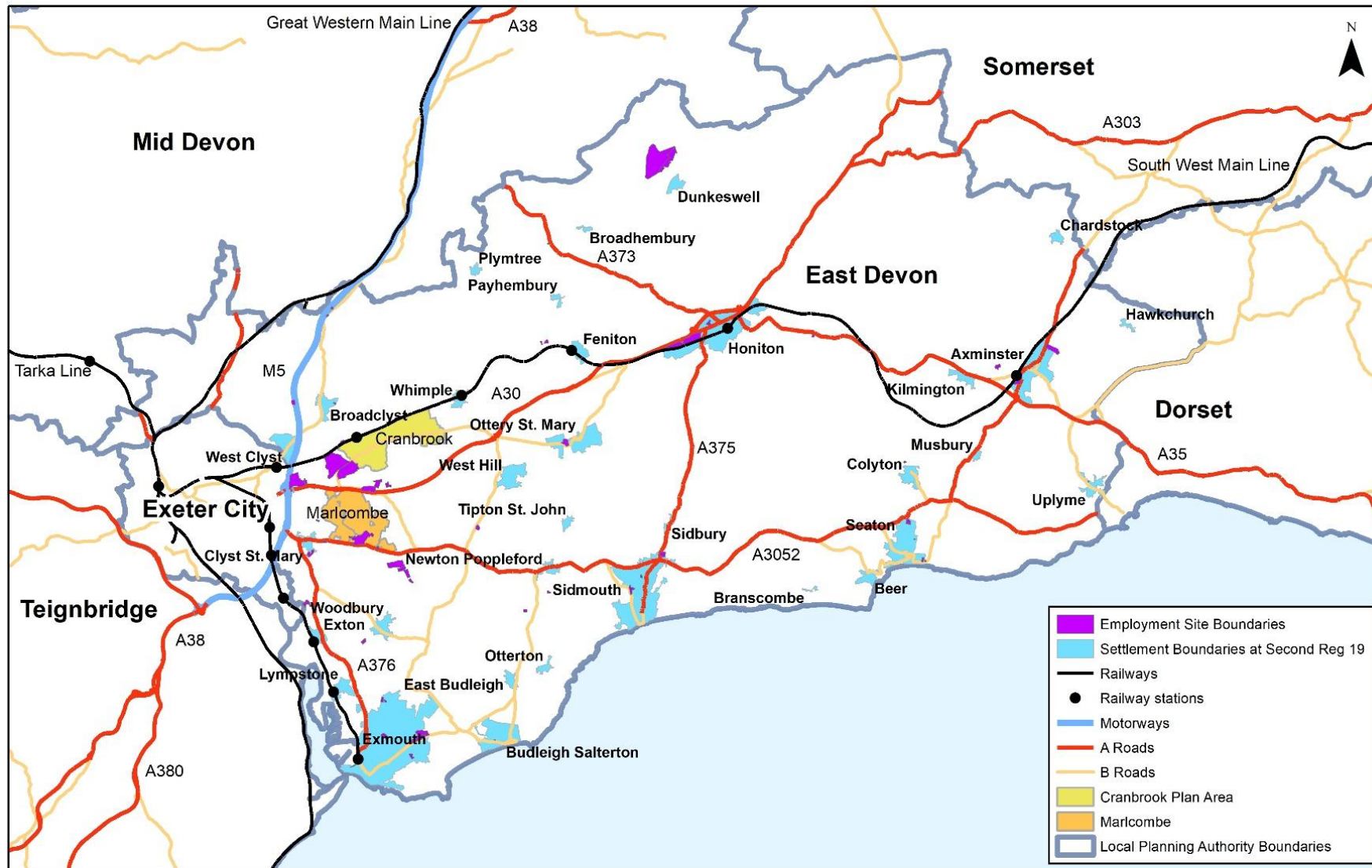
- 3.1 East Devon is located in a two-tier area, where Devon County Council provide many services but the Government has announced proposals for local government reorganisation in Devon that will result in the formation of a new unitary council by April 2028 under current timescales.
- 3.2 East Devon lies to the southeast of Devon, having boundaries with Exeter City, Teignbridge and Mid Devon and extending eastwards to the county borders with Dorset and Somerset. East Devon is primarily a rural area with an outstanding natural environment, reflected in the designation of its southern coastline as part of the Dorset and East Devon Coast World Heritage Site and 57% of the District being designated as National Landscapes. However, the close proximity of the city of Exeter to the western boundary of East Devon has helped to fuel demand for major developments.
- 3.3 The Exeter and East Devon Growth Point was formed in 2008 to help deliver strategic growth of around 25,000 new homes and over 25,000 jobs in the period up to 2026. Most of the major strategic developments delivered and promoted in the growth point area fall in East Devon, including: Cranbrook new community; Exeter Science Park; urban extensions/new housing east of Exeter; Skypark Businesses Park; and Strategic Transport Schemes. These developments formed a focus for growth in the adopted local plan and have partly been delivered. Since starting as a green field in 2011, by 1<sup>st</sup> April 2025 Cranbrook had grown to 3,229 dwellings. The Cranbrook Plan includes policies for expansion to nearly 8,000 homes. The Exeter and East Devon Enterprise Zone<sup>3</sup> was launched in 2017 and has four separate sites: Exeter Science Park, Skypark, Power Park and Cranbrook town centre.
- 3.4 The western part of East Devon continues as the strategic growth focus in the new local plan, with a second new community, Marlcombe, planned that will commence during the plan period and extend beyond it to around 10,000 homes. Marlcombe will be within 2 miles of the boundary with Exeter. Additional developments are included in the plan at the Enterprise Zone, Science Park and at and around Exeter Airport (which is in East Devon). An urban extension on land north of Topsham on the boundary with Exeter City will deliver around 600 homes, 2.4 ha of employment land, 1.8 hectares of land safeguarded for education and supporting infrastructure, green spaces and links to the Clyst Valley Regional Park.
- 3.5 Map 1 – Housing (on next page)

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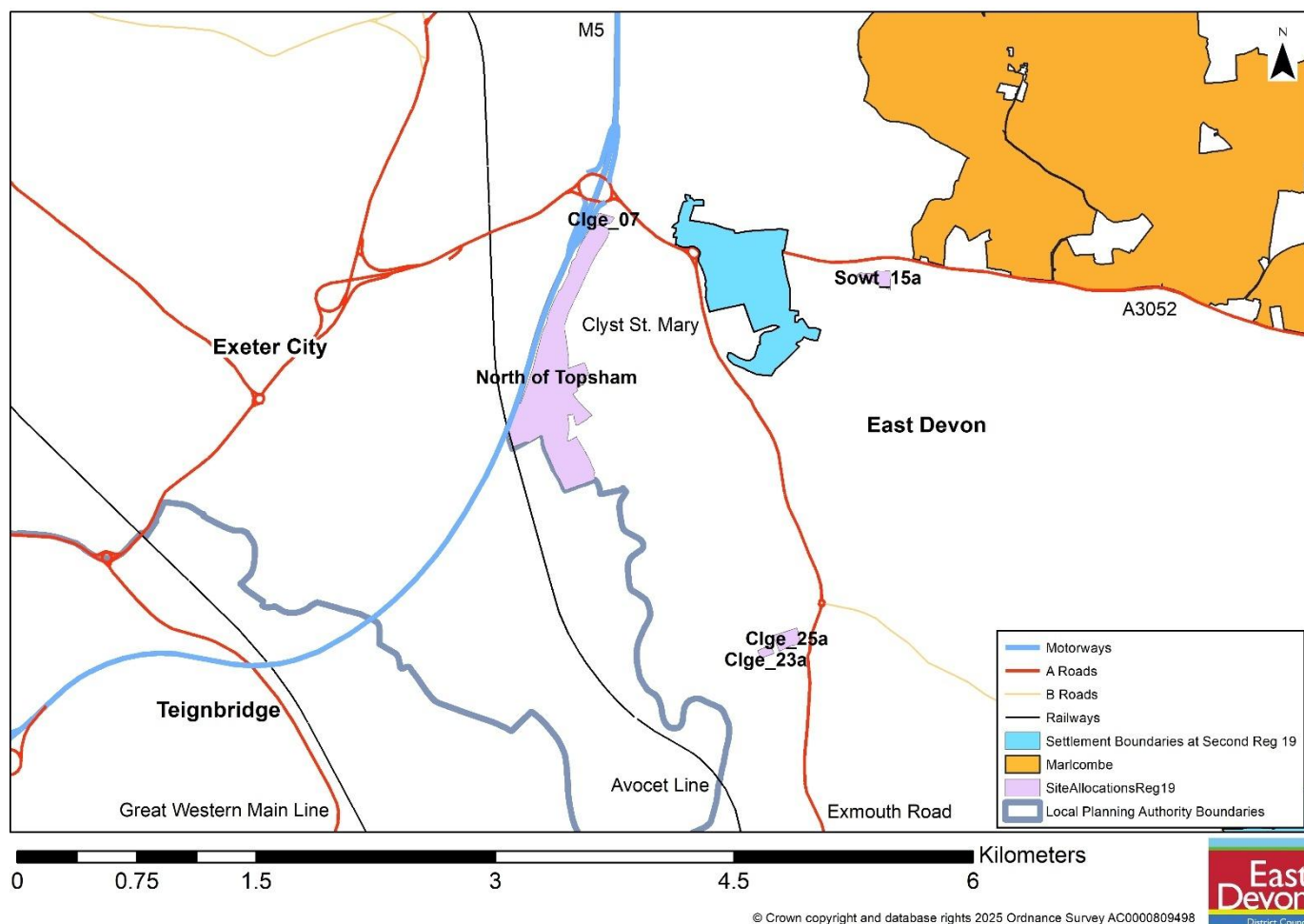
<sup>3</sup> Exeter & East Devon Enterprise Zone – Accelerating clean growth



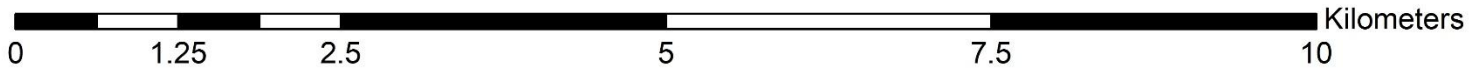
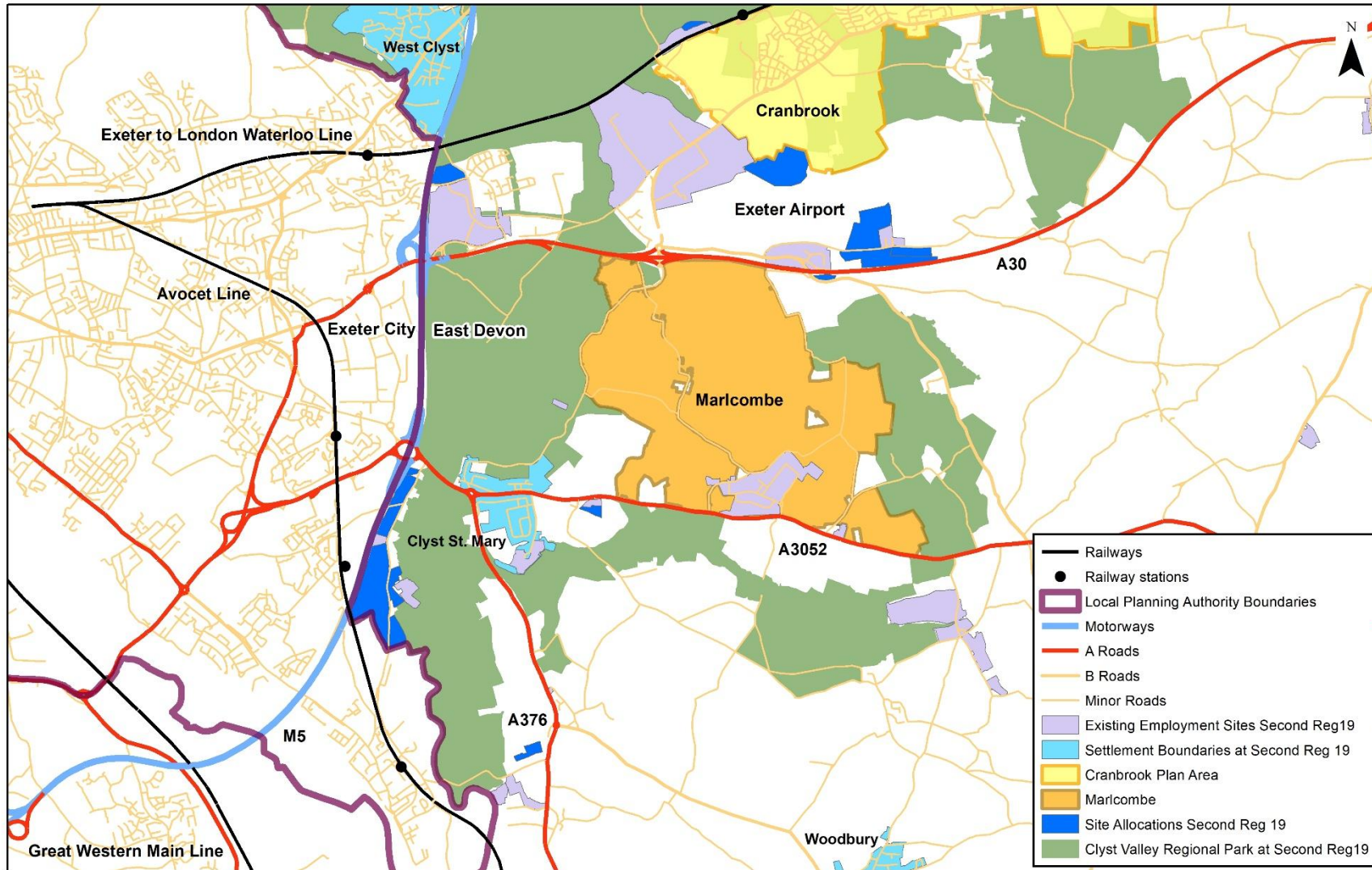
- 3.6 Map 1 shows the relationship between East Devon and the surrounding local planning authorities. It can be seen that East Devon and Teignbridge Districts wrap tightly around the historic city of Exeter, which is a focus for growth in the wider area. Cranbrook, Marlcombe and the strategic employment sites in the 'West End' are located close to Exeter. The towns of Exmouth, Budleigh Salterton, Sidmouth and Seaton lie on the coast, with the historic market towns of Honiton and Ottery St. Mary located centrally to East Devon. Axminster is the most easterly town, being within 2 miles of the border with Dorset and around 3 miles from the border with Somerset and 5 miles from the Somerset town of Chard. The East Devon village of Uplyme adjoins the Dorset town of Lyme Regis. Torbay is separated from East Devon (on land) by Exeter and Teignbridge. It is around 21 miles between the nearest East Devon settlement (Clyst St. Mary) and Edginswell, the nearest part of Torbay via main roads (the M5, A38 and A380).
- 3.7 Map 2 Employment (on next page) shows the main settlements of East Devon together with the main existing industrial sites and employment allocations. Most new employment development will be located to the west of the East Devon.
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Map 3 – North of Topsham allocation



- 3.8 Map 3 shows the North of Topsham allocation in East Devon (Strategic Policy WS10), together with part Marlcombe and the settlement boundary for Clyst St Mary and the major road network. The M5 forms the boundary of East Devon and Exeter in the vicinity of this allocation.
- 3.9 Map 4 – Marlcombe (on next page) shows Marlcombe in the context of Exeter, Cranbrook, Exeter Airport, the main transport network and part of the Clyst Valley Regional Park.



## 4 Strategic Matter H 01 – Meeting the East Devon housing requirement

### Summary of issues

- 4.1 The East Devon Local Plan is being prepared under the provisions of Annex 1 of the December 2024 National Planning Policy Framework (NPPF). This allows plans to progress under the December 2023 version of the NPPF subject to reaching the Regulation 19 stage of plan making within a certain timescale, which was met through the Regulation 19 consultation that started in February 2025. Under these provisions, the plan must meet at least 80% of the relevant standard method numbers. Applying 80% to the standard method figure of 1,146 generates a figure of 950.4 homes per year, this figure (950.4) over the 22 years of the local plan generates a local plan need of (at least) 20,908 net new homes.
- 4.2 Strategy Policy SP02: Levels of future housing development states that provision will be made for at least 20,909 dwellings (net) to be delivered in the plan period. The Housing Delivery Technical Report demonstrates how this will be achieved.

### Evidence base<sup>4</sup>

- 4.3 Housing Delivery Technical Report. This report was produced to support the second Regulation 19 plan to assess matters around future housing delivery. It:
- Advises on housing requirements for the local plan.
  - Sets out details of projected delivery rates.
  - Establishes the basis for a stepped housing requirement.
  - Demonstrates a greater than five-year land supply at the point of plan adoption.
  - Advises on progress towards the requirement to deliver 10% of housing requirement on small sites.

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<sup>4</sup> All housing related evidence is in the [Evidence and Examination Library - Housing \(HOU\) - East Devon](#)

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**Areas of agreement**

- 4.4 It is agreed between DC, SC, MDDC, ECC, TDC and TC that EDDC is seeking to meet at least 80% of its housing requirement, in accordance with the provisions of Annex 1 of the December 2024 NPPF.

**Areas of disagreement**

- 4.5 None.

**Active and ongoing co-operation**

- 4.6 East Devon will monitor delivery rates and take appropriate action to meet any significant shortfall.

**Parties involved**

- 4.7 The parties below are satisfied that the preceding is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: DC, SC, MDDC, ECC and TDS.

## 5 Strategic Matter H02 – Meeting the housing requirements of other local planning authorities

### Summary of issues

- 5.1 **Dorset** - Work on the Dorset Plan started in 2019, with an options consultation in 2021 and a further options consultation in August 2025. The intention is to consult on a Regulation 19 plan in August 2026 and submit for examination in December 2026 under the current plan making system. In response to the first East Devon Regulation 19 consultation, Dorset Council stated that it was not possible to say if Dorset will have an unmet housing need.
- 5.2 Most of the boundary between East Devon and Dorset is very rural and is within either the East Devon or the Dorset National Landscape. The town of Lyme Regis is located on the coast at the county boundary, and its urban area is contiguous with the East Devon village of Uplyme. Uplyme is identified in the Regulation 19 plan as a ‘service village’ where settlement boundaries have been defined and limited development is promoted. The settlement boundary defined in the Regulation 19 plan is larger than the existing boundary as shown in KSD – 11 Settlement Boundary Topic Paper. This should enable additional, small scale growth in Uplyme.
- 5.3 Various constraints limit development options in Dorset and Dorset Council, a fact recognised in the Dorset Council comments on the first Regulation 19 plan, when Dorset asked that Uplyme be considered as a ‘local centre’, where Strategic Policy 01 Spatial Strategy provides for development that meets local needs and those in the immediate surroundings. Dorset suggested that this should include Lyme Regis, particularly for affordable housing, including exception sites in Uplyme to meet a Lyme needs. Evidence for the settlement hierarchy is provided in the Role and Functions of Settlements report<sup>5</sup>, which acknowledged the relationship between Uplyme and Lyme Regis (para 4.19) but concluded that Uplyme should be a ‘service village’ where limited development would be encouraged.
- 5.4 There are very limited options available for allocations that are well related to Uplyme. The site assessment work identified only one reasonable alternative at Uplyme and this was rejected because the site is in the East Devon National Landscape and is highly sensitive to landscape change and it would be very difficult to access services and facilities in the town centre on foot or by cycling<sup>6</sup>.
- 5.5 The comments about Dorset Council not knowing if it will have unmet need is recognised and additional text has been added to paragraph 3.8 of the plan. This states that, “In the event of

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<sup>5</sup> [gev-001-role-and-function-of-settlements\\_report\\_v3-final-draft-for-spc.pdf](#)

<sup>6</sup> [sal-044-uplyme-site-selection-report.pdf](#)

housing not being delivered in accordance with the plan and/or the identified need for new homes changing in the future, including taking account of possible unmet needs in neighbouring areas, the requirements of national policy and legislation for a review/update of the plan will be followed”.

- 5.6 **Somerset** - Work on the Somerset Local Plan 2045 commenced in 2023 and Regulation 18 consultation on a draft plan is planned for April 2026. It is too early to say whether Somerset will request that neighbouring authorities help to meet its housing requirement.
- 5.7 **Mid Devon** - The current Mid Devon Local Plan was adopted in July 2020 and has a lifespan to 2033. However, changes to the ‘standard methodology’ for calculating housing requirements and the introduction of a new planning system mean that a local plan review has been incorporated into a new Local Development Scheme, which was approved in March 2025. It is too early to say whether Mid Devon will request that neighbouring authorities help to meet its housing requirement.
- 5.8 **Exeter** - The East Devon Local Plan has been prepared in parallel with work on the Exeter plan, although the Exeter plan was submitted for examination in September 2025. There has been a high level of co-operation throughout the plan making processes, including discussion of strategic cross boundary housing issues and the preparation of joint evidence to support strategic allocations that will meet a significant proportion of the housing requirement in both areas. The Publication Exeter Plan makes provision to meet its own housing requirement, and no requests have been made by Exeter for neighbouring authorities to help to meet their housing requirement.
- 5.9 **Teignbridge** - The examination of the Teignbridge Local Plan is complete, and adoption of the plan is expected in 2025. The plan makes provision for Teignbridge to meet its own housing requirement (outside of Dartmoor National Park) and no requests have been made for neighbouring authorities to help to meet the Teignbridge housing requirement.
- 5.10 **Torbay** - The Torbay Local Plan was adopted in 2015. Consultations on updating the housing policies of the plan were held in 2022, but changes to the national planning context in 2023 meant that further stages of the plan update were not progressed. The LDS published in February 2025 indicates that a Regulation 19 consultation will be undertaken in May 2026 with plan submission in October 2026.
- 5.11 At the first Regulation 19 consultation Torbay Council stated that it has repeatedly advised neighbouring councils in the adjoining Housing Market Areas /Functional Economic Market Areas that Torbay will not be able to meet the local housing need target set by the Government’s Standard Method. Torbay made an objection on the basis that no account had been made for the need to accommodate unmet needs from neighbouring areas, specifically Torbay and requested that East Devon meet part of its housing requirement. A similar request

had been made by Torbay early in the plan making process requesting that the Exeter Housing Market Area (which includes the western part of East Devon) help to meet its housing requirement.

- 5.12 East Devon has no shared border with Torbay and is separated from it (on land) by Exeter City Council and Teignbridge District Council. The submission Teignbridge Local Plan<sup>7</sup>, which borders Torbay, included a policy (H1) on meeting possible unmet housing needs from neighbouring authorities. However, the Inspectors advice<sup>8</sup> was that it would be better to include explanatory text to explain that, in the event of housing not being delivered in accordance with the plan, or if the identified needs for new homes were to change, the requirements of legislation and national policy/guidance in respect of the need for a review/update of the plan would be followed. This approach was incorporated into the main modifications of the plan. Similar text has been added to the second East Devon Regulation 19 plan as set out in paragraph 5.5 (Dorset) of this paper. However, given the physical separation between Torbay and East Devon, it may be difficult for Torbay to justify how the provision of additional housing within East Devon could meet the Torbay housing requirement. Furthermore, the environmental and other constraints of building additional housing in East Devon, rather than in or closer to Torbay, to meet a Torbay requirement would need to be properly investigated, considered and justified.

### **Evidence base**

- 5.13 Role and Functions of Settlements report<sup>9</sup>. This report was finalised in 2021 and provided evidence that informed the spatial strategy of the plan. It examined how the settlements in East Devon relate to each other – their role and function. The report presented information across the themes of population; employment; and community facilities and services. Based on this analysis, settlements that share similar characteristics were grouped together and placed in different tiers, known as the “settlement hierarchy”. This paper provides evidence for Strategic Policy SP01: Spatial strategy.
- 5.14 Settlement boundary topic paper<sup>10</sup>. This paper explains how settlement boundaries have been drawn, and this version of the paper was produced to support the second Regulation 19 plan. Settlement boundaries have been drawn around most of the settlements included in Strategic Policy SP01: Spatial strategy. They are designed to promote opportunities for housing within the settlement boundaries, in addition to allocations, so that they guide but do not stifle the outward growth of settlements in line with the plan strategy. The topic paper includes plans showing the settlement boundaries proposed at various stages of plan preparation for each

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<sup>7</sup> Examination Library – Core Submission Documents - Teignbridge District Council

<sup>8</sup> [appendix-1-post-hearing-letter.pdf](#) paras 6 and 7

<sup>9</sup> [gev-001-role-and-function-of-settlements\\_report\\_v3-final-draft-for-spc.pdf](#)

<sup>10</sup> Evidence and Examination Library - Key Supporting Documents (KSD) - East Devon

settlement and explains how the methodology for defining settlement boundaries has been used to define each boundary.

- 5.15 Site allocations methodology and site selection reports<sup>11</sup>. This paper explains the process of how sites were identified, assessed, and selected for allocation, or not. The process applied to housing, gypsy and traveller, and employment allocations. It is supported by a landscape sensitivity methodology<sup>12</sup>, a historic environment site assessment methodology<sup>13</sup> and ecology guidelines for housing allocations<sup>14</sup>. Individual assessments were included for all settlements and allocations<sup>15</sup>, supported by a major development in the national landscape topic paper<sup>16</sup>.

### **Areas of agreement**

- 5.16 It is agreed between East Devon, Dorset, Somerset, Mid Devon, Exeter, Teignbridge and Torbay that, where the potential unmet housing requirements of other LPA's are either unknown or unquantified, the inclusion of paragraph 3.8 of the second Regulation 19 plan is sufficient to deal with any future uncertainties.
- 5.17 It is agreed between East Devon, Dorset, Somerset, Mid Devon, Exeter, Teignbridge and Torbay that, any consideration of meeting the housing requirements of other LPA's should be informed by a joint objective assessment, to an agreed and defined methodology, that runs across local authority boundaries to assess suitability for development of potential housing developments sites.

### **Areas of disagreement**

- 5.18 None.

### **Active and ongoing co-operation**

- 5.19 The authorities of Dorset, Somerset, Mid Devon and Torbay will progress work on their local plans in consultation with East Devon to assess whether their housing requirement can be met without asking others to contribute. Where a potential shortfall is identified, all parties commit to undertaking assessments of constraints to a common framework and in a collaborative manner so that the justification for a review/update of the East Devon plan (or any plan replacing it through local government reorganisation) can be properly considered.

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<sup>11</sup> [sal-001-site-selection-methodology\\_v2-2020-2042.pdf](#)

<sup>12</sup> [sal-002-landscape-sensitivity-assessment-methodology.pdf](#)

<sup>13</sup> [sal-003-historic-environment-site-assessment-methodology.pdf](#)

<sup>14</sup> [sal-004-ecology-guidelines-for-housing-allocation.pdf](#)

<sup>15</sup> Individual reports are available at [Evidence and Examination Library - Site Allocations \(SAL\) - East Devon](#)

<sup>16</sup> [sal-049-rev-major-development-in-national-landscapes.pdf](#)

### **Parties involved**

- 5.20 The parties below are satisfied that the following is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: DC, SC, MDDC, ECC, TDS and TC.

## 6 Strategic Matter H 03 – Meeting the Gypsy and Traveller requirement

### Summary of issues

- 6.1 A jointly commissioned needs assessment for permanent pitch provision was undertaken with Exeter, Mid Devon and Teignbridge. This was used to produce individual assessments for each authority, appreciating that each authority was at a different stage of plan production. Whilst the reports were being produced, the definition of ‘Traveller’ in the NPPF changed several times and so the timescale for receiving the final reports had to be extended and the figures recalculated. At the point of receiving the final report, Teignbridge were at examination, so their approach was fixed but had been informed by draft versions of the study. Regular progress meetings have been held since the joint report’s inception, and East Devon and Mid-Devon have progressed their plans on the basis of each meeting their whole need and including policy criteria for any additional applications, whilst Exeter had a very low level of need and will meet this through a criteria-based policy approach only.
- 6.2 A requirement for at least 15 pitches up to 2042 and at least 15 pitches beyond 2042 is included in Strategic Policy WS01: Development of Marlcombe new community east of Exeter. The Cranbrook Plan also includes a requirement for 15 pitches, and these are due to be delivered early in the local plan period. A specific allocation, Strategic Policy WS11: Gypsy and traveller site east of M5, which was included in the first Regulation 19 plan has been removed from the second Regulation 19 plan due to significant constraints. A criteria based policy to guide applications for new permanent or transit gypsy, traveller or travelling show people sites is included in the plan (Policy HN09).
- 6.3 Need for a transit site/s is being addressed jointly between all four authorities. This requires a consistent approach to data recording and collection over at least a one year period, due to start in Spring 2026 (to reflect the summer travelling timetable). A joint methodology has been agreed between the partner authorities with advice from DCC.

### Evidence base

- 6.4 East Devon Gypsy and Traveller Accommodation Assessment September 2024<sup>17</sup>. This was published in 2024 and assesses current and future need for Gypsy, Traveller and Travelling Show people accommodation in East Devon.

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<sup>17</sup> [East Devon Gypsy and Traveller Accommodation Assessment September 2024](#)

### **Areas of agreement**

- 6.5 It is agreed between Dorset, Somerset, Mid Devon, Exeter, Teignbridge and Devon County Council that there are no cross boundary issues with respect to provision for gypsies and travellers and travelling show people. The needs and provision will be provided for within respective authorities.

### **Areas of disagreement**

- 6.6 None

### **Active and ongoing co-operation**

- 6.7 The authorities of East Devon, Teignbridge, Exeter and Mid Devon working together with Devon County Council agree to: Use the agreed methodology for assessing the need for transit sites, share the results and agree a location for any new transit site/s within the wider study area (the area covered by the 4 authorities) based on these findings.

### **Parties involved**

- 6.8 The parties below are satisfied that the preceding is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: DCC, MDDC, ECC, TDS, DC and SC.

## 7 Strategic Matter E 01 – Meeting East Devon employment needs

### Summary of issues

- 7.1 The Publication local plan and supporting documents, demonstrate that East Devon can meet its employment needs. Around 175ha of employment land is allocated in Strategic Policy SP04: Employment provision and distribution strategy. This comprises committed sites (already built in the plan period/allocations), in both the Cranbrook Plan and the local plan, and sites with planning permission/under construction.
- 7.2 The total amount of employment land (175ha) is significantly above the forecast employment requirement of 80 ha identified in the Economic Development Needs Assessment (EDNA). This is largely due to the EDNA's findings that some sites that are allocated in the current local plan have stalled or progressed more slowly than anticipated and so alternative sites are required in order to meet the current shortfall, as well as additional sites to meet the future forecast need and deliver the emerging local plan strategy. There are several reasons for this- some sites allocated in the current local plan have stalled/progressed slowly and so alternative sites are required to meet the current shortfall; the emerging local plan strategy is multi-faceted and requires a sufficient range of sites to deliver high quality West End growth, ensure that Cranbrook and Marcombe are able to meet residents needs, and continue to provide new jobs at the tier 1 and 2 settlements to promote their self-containment; and sites are likely to be developed at lower densities than anticipated in the EDNA (for example to accommodate 20% biodiversity net gain, SUDS, landscaping and mitigating impact on protected landscapes).
- 7.3 The Councils strategy in the emerging local plan is to allocate sufficient sites to promote settlement self-sufficiency and accommodate a variety of users from across the demand spectrum (particularly in clean growth technologies), as well as enabling expansion of existing businesses and improving the job density ratio for East Devon residents. These strategic aims have led the emerging plans approach to site allocation, and consequently the amount of employment land required. Since the EDNA, Biodiversity Net Gain requirements have also been introduced and the emerging local plan target of 20% BNG provision (Policy PB05), along with mitigation measures to accommodate site specific constraints such as flooding, heritage assets and landscape impact, will reduce site densities, requiring additional land to be allocated (potentially at least 34ha of the 175ha allocations).
- 7.4 Ensuring settlement self-containment is key to enabling sustainable community development and therefore represents a significant bulk of the new allocations (at Cranbrook, at Marcombe and across the other towns of East Devon). Enabling existing East Devon businesses to expand is also important, as this prevents the need for relocation out of the district.
- 7.5 Around 40 ha of land has been allocated in the West End on strategic sites in recognition that businesses developing aviation technology require close proximity to the airport, whilst modern

logistics uses need quick and easy access to major road networks. To maximise agglomeration benefits, allocating land for clean growth, high-tech aviation and logistics in close proximity will enable innovations which link together these uses. Promoting clustering in these sectors aligns with the council's Economic Development Strategy.

- 7.6 East Devon had a job density ratio of 0.76 (76 jobs per 100 residents aged 16-64) in 2022, below the national average of 0.87 and a key objective of the Council's economic development strategy is to improve this. The development of 175ha of employment land will help to address business need and allow flexibility to accommodate changing market conditions over the plan period whilst also helping to correct East Devon's low job density ratio.
- 7.7 In its comments on the first Regulation 19 plan, ECC noted that "East Devon, Exeter, Mid Devon and Teignbridge Councils have a jointly commissioned economic development needs assessment which provides the employment evidence for the functional economic area (FEMA). It is noted that through the East Devon Local Plan East Devon are making a significant contribution to employment land requirements and that overall, the employment development needs of the FEMA are being met. This demonstrates that the area operates on a functional geography which crosses administrative boundaries. The City Council supports this approach".
- 7.8 The jointly commissioned EDNA specifically considered the need for logistics land and identified a shortfall of 8ha across the whole study area. The 175ha of employment land will incorporate this 8ha within land allocated north of Exeter Airport (adjoining the Treasbeare expansion), in close proximity to the M5 and all 3 partner authorities.

### **Evidence base**

- 7.9 Greater Exeter Economic Development Needs Assessment (EDNA)<sup>18</sup>. This document was published in January 2023 as evidence to help the 'Greater Exeter authorities'<sup>19</sup> identify the future scale and location of economic growth across the area. It considered employment land demand over the period from 2020 to 2040.
- 7.10 East Devon Economic Development Strategy<sup>20</sup>. This covers a period from 2024 to 2029 and sets out a vision for 'East Devon to have a sustainable and equitable economy geared towards the improved wellbeing of our residents, prosperity of our businesses and protection of our natural landscapes'. To help to fulfil this vision, the strategy includes a workspace policy to

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<sup>18</sup> [ecn-001-greater-exeter-edna-final-report.pdf](#)

<sup>19</sup> EDDC, ECC, MDDC and TDC

<sup>20</sup> [ecn-002-economic-development-strategy-2024-29.pdf](#)

sustainably increase the net supply of employment land and commercial premises across East Devon.

- 7.11 A Clean Growth Vision for the West of East Devon<sup>21</sup>. Devon County Council commissioned this document to support a strategic case for the future development of the “West End” area of East Devon and to inform the East Devon Local Plan. It sets out a vision to radically reduce carbon while growing the economy and delivering a place that enhances and works with its natural environment and provides an exceptional quality of life for all its residents. It considered the overarching requirements to provide high-level clean growth development, including spatial considerations, economic development & skills, environment, energy and transport infrastructure.
- 7.12 Exeter and East Devon SoCG<sup>22</sup>. This SoCG was produced by ECC and signed by EDDC to support the submission version of the Exeter Plan. It details representations on the plan from EDDC, summarises discussions between EDDC and ECC and sets out suggested plan modifications to address the issues considered (economy and jobs and allocations).

#### **Areas of agreement**

- 7.13 It is agreed between Dorset, Somerset, Mid Devon, Exeter and Teignbridge that East Devon is meeting its own employment needs.

#### **Areas of disagreement**

- 7.14 None.

#### **Active and ongoing co-operation**

- 7.15 None

#### **Parties involved**

- 7.16 The parties below are satisfied that the following preceding is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: DC, SC, MDDC, ECC and TDC.

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<sup>21</sup> [ecn-006-a-clean-growth-vision-for-the-west-of-east-devon.pdf](#)

<sup>22</sup> [dte-03c\\_statement-of-common-ground-exeter-city-council-and-east-devon-district-council\\_redacted.pdf](#)

## 8 Strategic Matter E 02 – Meeting the employment needs of others

### Summary of issues

- 8.1 ECC consider that the East Devon allocation of around 175ha of employment land exceeds the East Devon need and that the ‘surplus’ can be considered as meeting the wider ‘Greater Exeter’ need.
- 8.2 EDDC objected to the Exeter Plan (at Regulation 19 stage) on the basis that it fails to allocate or otherwise make sufficient land available to accommodate the future employment needs of the city, undermining the economic growth potential of the city and the stimulus it provides for the wider area and leading to pressure to accommodate growth outside the city boundary. In response to this objection, ECC commissioned additional work to consider what would be an appropriate jobs growth target for Exeter. Modifications are proposed to the Exeter Plan to insert a jobs growth target for Exeter, set out the potential for economic growth generated by the FEMA over the plan period and to show how this is met by the constituent authorities and adopt a more flexible approach to allow traditional employment uses in site allocations in addition to the ‘transformational’ sectors.
- 8.3 To support its submission plan, ECC has prepared an Economy and Jobs Topic Paper that acknowledges that, whilst a significant element of the employment land need for the FEMA is generated in Exeter, the constrained nature of Exeter’s administrative boundary means that much of this need will be met outside of the Exeter boundary (paragraph 6.1). EDDC does not accept that the employment strategy of the East Devon plan exceeds East Devon needs given the plan strategy to encourage the self-containment of settlements, expansion opportunities for existing businesses, business clustering around the airport and the improvement of the East Devon job density ratio (as set out in paragraphs 7.2 to 7.9 of this report).
- 8.4 A SoCG has been agreed for the Exeter Plan on this issue. In this, EDDC state an expectation that Exeter meets its own needs in terms of employment land and highlights that there has been no indication of how much employment land need Exeter CC expect to be met outside the city or any discussion about the division of this between the neighbouring authorities. In the SoCG between Exeter and East Devon relating to the Exeter Plan, Exeter state that “...whilst East Devon’s contends that its own employment land allocations only meet the District’s own needs, the Draft East Devon Local Plan has identified 178 ha of employment land supply to meet a need for 80 ha generated by the East Devon economy (as determined by the EDNA). The Draft East Devon Local Plan appears to be meeting the long-established principle of considering need and supply across the FEMA. Without considering the principle of balancing supply and needs across Greater Exeter, East Devon’s Plan could be seen as over-providing employment sites, leaving some sites vulnerable to proposals for alternative use”. The SoCG concludes that “Detailed discussions have not resolved this issue, and further consideration will

be needed on this matter including through the Exeter Plan examination”. The ‘further considerations’ relate to matters of plan soundness rather than the duty to cooperate.

### **Evidence base**

- 8.5 Greater Exeter Economic Development Needs Assessment<sup>23</sup>. This document was published in January 2023 as evidence to help the ‘Greater Exeter authorities’<sup>24</sup> identify the future scale and location of economic growth across the area. It considered employment land demand over the period from 2020 to 2040.
- 8.6 East Devon Economic Development Strategy<sup>25</sup>. This covers a period from 2024 to 2029 and sets out a vision for ‘East Devon to have a sustainable and equitable economy geared towards the improved wellbeing of our residents, prosperity of our businesses and protection of our natural landscapes’. To help to fulfil this vision, the strategy includes a workspace policy to sustainably increase the net supply of employment land and commercial premises across East Devon.
- 8.7 A Clean Growth Vision for the West of East Devon<sup>26</sup>. Devon County Council commissioned this document to support a strategic case for the future development of the “West End” area of East Devon and to inform the East Devon Local Plan. It sets out a vision to radically reduce carbon while growing the economy and delivering a place that enhances and works with its natural environment and provides an exceptional quality of life for all its residents. It considered the overarching requirements to provide high-level clean growth development, including spatial considerations, economic development & skills, environment, energy and transport infrastructure.
- 8.8 Exeter and East Devon SoCG<sup>27</sup>. This SoCG was produced by ECC and signed by EDDC to support the submission version of the Exeter Plan. It details representations on the plan from EDDC, summarises discussions between EDDC and ECC and sets out suggested plan modifications to address the issues considered (economy and jobs and allocations).
- 8.9 Exeter Employment and Jobs Topic Paper<sup>28</sup>. This was produced by ECC to support its submission plan. It sets out policy background and evidence supporting the economy and jobs

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<sup>23</sup> [ecn-001-greater-exeter-edna-final-report.pdf](#)

<sup>24</sup> EDDC, ECC, MDDC and TDC

<sup>25</sup> [ecn-002-economic-development-strategy-2024-29.pdf](#)

<sup>26</sup> [ecn-006-a-clean-growth-vision-for-the-west-of-east-devon.pdf](#)

<sup>27</sup> [dtc-03c\\_statement-of-common-ground-exeter-city-council-and-east-devon-district-council\\_redacted.pdf](#)

<sup>28</sup> [top-04\\_economy-and-jobs-topic-paper.pdf](#)

chapter of the Exeter Plan. It also includes an assessment of the issues arising through the Regulation 19 consultation.

### **Areas of disagreement**

- 8.10 There is no agreement between ECC and EDDC over:
- 8.11 The need to quantify and have specific agreement/s with neighbouring LPA's on where unmet Exeter generated employment land could/should be located.
- 8.12 Whether allocations in the East Devon Plan will meet either part or all of the Exeter employment needs that are not being met through the Exeter Plan.

### **Active and ongoing co-operation**

- 8.13 ECC and EDDC agree that this issue will be considered through the Exeter Plan examination.

### **Parties involved**

- 8.14 The parties below are satisfied that the following is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: ECC.

## 9 Matter A01 – Cross boundary impacts of Marcombe new community

### Summary of issues

- 9.1 Summary of issues
- 9.2 The local plan includes an allocation for a new community in East Devon called Marcombe to the east of Exeter (just to the east of the existing county show ground).
- 9.3 Marcombe will be a comprehensively planned mixed use new town incorporating residential, employment, educational facilities and supporting infrastructure and services. The emphasis will be on securing a self-contained 21st century town that meets the need of what will, over the years ahead, be home to a rapidly expanding population.
- 9.4 Land allocated in the local plan will accommodate up to around 8,000 new homes with provision made for 3,300 in this local plan, up to 2042. Beyond this time period land allocations will take the new community to 8,000 and policy provision provides for development beyond that point to take Marcombe up to 10,000 new homes. The planned size of Marcombe, the multi-party involvement in policy development and proximity to boundaries of Exeter and Teignbridge are such that it will inevitably have impacts on and cross-boundary relationships with a wider area.
- 9.5 Strategic Policy WS01 – sets out policy for comprehensive development of Marcombe, and refers to allocation of land on the Policies Map for the development of an overall package of services and facilities. A Masterplan has been produced for the development of Marcombe and development is supported by a dedicated Infrastructure Delivery Plan (though with the intent that in due course this will be merged with the overarching East Devon wide Infrastructure Delivery Plan).
- 9.6 There has been considerable partnership working in building up proposals for the Marcombe development. Much of this has been coordinated through and by use of a consultancy team commissioned by East Devon District Council. A considerable amount of work, in particular through collaboration with National Highways and Deven County Council, has been undertaken in respect of transportation and highways matters. Such work and references to Duty to Cooperate matters are address in a separate transportation statement and are not replicated in this paper.
- 9.7 At the first stage of Regulation 19 consultation in the local plan it was noted that more detailed policy provision will be established for Marcombe and that further comment would be welcomed as planning progressed. Representations commenting specifically on new

community matters, from Duty to Cooperate partners/bodies at the first Regulation 19 consultation, are identified as:

- 9.8 Devon County Council – specifically in respect of education provision the County Council advised “Provision for children and young people is considered critical for the delivery of the plan. Devon County Council and East Devon District Council have successfully delivered education infrastructure early in Cranbrook which has supported the new town to grow, including a new primary and an education campus and timing of delivery in the second new community will be a key consideration for successful delivery.” Specifically given parental choices Marlcombe may provide for some cross- boundary educational needs. In representation the County Council noted that make up of school provision that is appropriate.
- 9.9 The County Council also commented on other matters in policy those these do not address matters of Duty to Cooperate.
- 9.10 Environment Agency – made comment on a number of matters relevant to Marlcombe including zero carbon and provision of a new wastewater treatment works. Comment was also made on infrastructure matters more generally. However, comments made did not specifically raise considerations relevant to the Duty to Cooperate.
- 9.11 Exeter City Council – In representation the city council note the significance of the new community and the need for a mix of uses and supporting infrastructure. Representation notes potential for impact on the city and the role the City Council has helped play in work that has led to proposals. The City Council express a desire in continued cross-boundary working and a desire to be involved in plan examination. Concerns directly related to duty to Cooperate are not, however, explicitly raised.
- 9.12 Historic England – support development of a masterplan and for a high quality distinctive development making efficient use of land. Hoistic England, however, do not consider that Policy WS01 represents a positive strategy for the historic environment. Views expressed relate to need for innovative design and need to identify heritage features and to integrate these into end design proposals, with designated and non-designated assets and their settings conserved and enhanced. Greater reference to drawing on surrounding character in design work and securing positive outcomes for conservation and enhancement of the historic environment are supported.
- 9.13 NHS - Local Planning Authority Engagement Team – concern raised that new community and wider west end development is not supported by viable plans to expand the capacity of primary care infrastructure to meet the increase in population without a considerable contribution from the development that is ring fenced for healthcare investments. Policy fails to explicitly state need for new GP facilities. A call is made for policy/SPD setting out a mitigation methodology for primary care (GP services).

## Evidence base

9.14 Marlcombe vision document<sup>29</sup>. This was published in September 2025 by EDDC and sets out the site characteristics and public engagement to date, together with social and physical infrastructure requirements. The document also establishes overarching concepts to create a self-sufficient, healthy, and dynamic community with a distinctive character. These are:

- Provision of a network of connected accessible and high-quality open spaces that integrate with topography and the wider green and blue infrastructure network including connections to the Clyst Valley Regional Park.
- Establishment of a comprehensive and integrated network of active travel routes, including connection to strategic active travel and public transport routes and creating links to Clyst Valley Regional Park, Cranbrook and local employment.
- Creation of three walkable neighbourhoods, each centred around a primary school, a local centre, and open space with key destinations beyond the new community linked by accessible, attractive routes that promote active travel.
- Creation of three distinct neighbourhoods, sensitively integrated into the existing natural topography, with higher densities in and around centres and primary transport routes. drawing on existing local characteristics of historic East Devon towns and villages, incorporating tight urban forms, such as terrace homes.

9.15 Marlcombe strategic outline business case<sup>30</sup>. This was prepared for EDDC and published in September 2025 to underpin proposals for Marlcombe by providing a business case to justify the establishment of a development corporation to co-ordinate the delivery and enhancement of Marlcombe, Cranbrook, the Enterprise Zone and Exeter Airport.

## Areas of agreement

9.16 The parties below are satisfied that the following is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: DC, EA, ECC, HE, and NHS.

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<sup>29</sup> [democracy.eastdevon.gov.uk/documents/s28562/1](https://democracy.eastdevon.gov.uk/documents/s28562/1). Appendix 3 5845 East Devon Vision document 2025-09-12.pdf

<sup>30</sup> [East Devon: Strategic Outline Business Case for Marlcombe- Phase 1 \(Executive Summary\)](#)

**Areas of disagreement**

9.17 None

**Active and ongoing cooperation**

9.18 East Devon District Council will work with partner bodies on the ongoing development and refinement of proposals for the development of Marcombe, both with and beyond direct local plan work. Particular attention will be given to secure a high-quality distinctive development that is very well serviced by infrastructure and facilities that are delivered in a timely manner.

**Parties involved**

9.19 The parties are satisfied that the preceding is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: ECC, DCC, EA, HE, NH, NE and NHS.

## 10 Strategic Matter SA 01 – Cross boundary impacts of North of Topsham mixed use allocation

### Summary of issues

- 10.1 The local plan includes an allocation for mixed use residential, employment, and supporting infrastructure on land adjoining the border with Exeter City (Strategic Policy WS10: Development next to the M5 and north of Topsham). Land is also safeguarded for education purposes. Nearby sites are also allocated in the submission Exeter Plan. Also close by and in Exeter are recently consented development sites. There has been an appreciation that sites on both sides of the administrative boundary should come forward in a co-ordinated way to ensure that infrastructure is delivered appropriately. Policy WS10 requires that the allocation comes forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. It further states that the Masterplan is developed in conjunction with joint work with Exeter City Council on a formal Development and Infrastructure Delivery Framework to ensure development and infrastructure is undertaken in a coordinated cross-boundary manner. The policy states that the delivery framework will include primary healthcare, indoor space for community use, and sports, recreation and green infrastructure to meet needs from development in Exeter and East Devon. A comprehensive transport strategy and respect for the Exeter landscape setting area. The policy states that the delivery framework will be produced jointly by EDDC and the City Council working with partners including landowners, developers, Devon County Council, National Highways, the Environment Agency, Natural England, the NHS, community groups and Clyst St George Parish Council.
- 10.2 At the Regulation 19 consultation on the Exeter Plan, EDDC expressed concern that Policy T11 (of the Exeter Plan) referred to production of an Infrastructure Delivery Framework to address this issue but did not require a joint masterplan or site framework. East Devon was concerned that the consequence of this would be the loss of opportunity for infrastructure delivery, including through Section 106. An objection was made to the Exeter Plan on those grounds.
- 10.3 A SoCG produced by Exeter to support its submission plan deals with this issue by Include additional paragraph after paragraph 16.36 to read: 'Major development proposals on the edge of Topsham between the M5, Exeter Road and Clyst Road will be required to come forward in accordance with the Topsham Infrastructure Delivery Framework when this is in place'.

### **Evidence base**

- 10.4 [Exeter Plan](#)<sup>31</sup>. The Exeter Plan was submitted for Examination in September 2025 and includes allocations close to the East Devon and Exeter boundary.
- 10.5 [Exeter and East Devon SoCG](#)<sup>32</sup>. This SoCG was produced by ECC and signed by EDDC to support the submission version of the Exeter Plan. It details representations on the plan from EDDC, summarises discussions between EDDC and ECC and sets out suggested plan modifications to address the issues considered (economy and jobs and allocations).

### **Areas of agreement**

- 10.6 East Devon and Exeter agree that Major development proposals on the edge of Topsham between the M5, Exeter Road and Clyst Road will be required to come forward in accordance with the Topsham Infrastructure Delivery Framework when this is in place.

### **Areas of disagreement**

- 10.7 None.

### **Active and ongoing co-operation**

- 10.8 The authorities of EDDC and ECC agree to produce a Delivery Framework in accordance with Policy WS10 of the East Devon Local Plan, working with DCC, NH, EA, NE and NHS.

### **Parties involved**

- 10.9 The parties below are satisfied that the preceding is an accurate position statement as of publication of the second Regulation 19 Plan in November 2025. This Statement of Common Ground will be reviewed prior to the submission of the local plan for examination. NB signatures are not required at this stage, but the following bodies will be invited to sign at submission stage: ECC DCC, NH, EA, NE and NHS.

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<sup>31</sup> [Exeter Plan: Submission and Examination - Core submission documents - Exeter City Council](#)

<sup>32</sup> [dte-03c\\_statement-of-common-ground-exeter-city-council-and-east-devon-district-council\\_redacted.pdf](#)