

Filtered Data Export

**Full name:** Alex Bullock

**Organisation (where relevant):** LVA

**Other party name (if relevant):** Clyst Honiton LVA LLP

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Regulation 19 Consultation

As per the Section "About this Consultation" makes clear this current consultation is being progressed by the authority as part of a two-staged approach to Regulation 19 consultation with a second consultation, focussed predominantly on the new community and "further policy refinement" will take place later in 2025.

We understand that the rationale for such an approach is to hit the transitional arrangements introduced by the National Planning Policy Framework (December 2024) in respect of the application or otherwise of the revised Standard Method on housing requirement. We are concerned by the Council's approach in this regard as we can see a real danger that the approach will be the subject of challenges as to whether it is in fact compliant with the transitional arrangements such that the Plan is ultimately further delayed prior to submission to correct matters, noting of course that the Council is planning in housing requirement purposes for almost exactly the 80% of the Standard Method figure.

In a broader context we feel as though the Council, in planning only for the minimum housing requirement, is only storing up problems for a later date and we firmly believe that there exist ample opportunities for the Council to have taken a more positive approach and tackled the full housing need head on, not least because there is a pressing and extensive affordability issue across much of East Devon and an exceptionally high affordable housing need. If we plan only for the minimum then we miss the opportunity to deliver lasting change, and this is solely at the detriment of all of those people who currently cannot afford to own their own home.

**Full name:** Dan Trundle

**Organisation (where relevant):** Black Box Planning Ltd

**Other party name (if relevant):** of Greenhayes (Greendale Group / Crealy Farms)

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** 3.1

A new National Planning Policy Framework was published in December 2024. However, it included provisions, within Annex 1, to enable draft Plans to continue preparation and examination, as part of the Transitional Arrangements, in accordance with the previous December 2023 version of the NPPF.

3.2

The Transitional Arrangements are set out at NPPF Paragraph 234, which identifies that for the purposes of preparing local plans, the policies in the current version of the Framework will apply from 12th March 2025.

3.3

This is the case except where the plan has reached Regulation 19 (pre-submission stage) on or before 12th March 2025, and its draft housing requirement meets at least 80% of local housing need (refer to NPPF Paragraph 234(a)). In which case, the plan will be examined under relevant previous version of the Framework.

3.4

It is understood that East Devon District Council consider that the plan has reached Regulation 19 stage and therefore should be examined against the previous version of the Framework and that the Transitional Arrangements to examine it in accordance with the December 2023 NPPF engaged.

3.5

Greenhayes consider that the plan has “not reached Regulation 19 stage” in consideration of the meaning given at Footnote 82 and the Town and County Planning (Local Planning) (England) Regulations 2012.

3.6

NPPF Footnote 82 explains that in this context “reached Regulation 19” refers to when Regulation 19 has been complied with. Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012 states, in full, that:

‘Before submitting a local plan to the Secretary of State under Section 20 of the Act, the local planning authority must:

(a)

Make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with Regulation 35;

(b)

Ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under Regulation 18(1)’.

3.7

Regulation 17 sets out the application and interpretation of Part 6 (which includes Regulation 19). This sets a definition for “proposed submission documents” and this extends to (e) “such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan”. i.e. the full local plan supporting evidence base.

3.8

In this instance, the full evidence base has not yet been published as beyond the 12th March 2025. Within the evidence base published on the Council website, various references are made to missing documentation:

- 

HOU-015 “Additional document to follow consultation”

- 

CCF-001 Water Cycle Study “to follow”

- 

HCO-004 Playing Pitch Strategy “to follow soon”

- 

HCO-005 Open Space Strategy “potential study that may be produced”

- 

HRD-004 East Devon Heritage Strategy (2024-2042) “to follow consultation”

3.9

Clearly, the Council consider these missing documents to be entirely relevant to the preparation of the plan, being listed on the Council’s own published evidence and examination library.

3.10

Additionally, Policies WS01 and WS02 acknowledge that critical evidence base documents such as an Infrastructure Delivery Plan for the Second New Community and a viability assessment have not yet been commissioned. This is a serious failing.

### 3.11

Furthermore, various evidence base documents were published following the start of the consultation, meaning that the full six-week period was not available to representors with the benefit of the full local plan and comprehensive evidence base. A request was made in writing by Greenhayes for an extension to the consultation in order to ensure the full six-week period was available to representors, however this was declined. This in itself is contrary to the Regulations. Please refer to evidence attached at Appendix 1.

### 3.12

The Plan itself (ref Page 5) recognises that this consultation represents the first planned phase of Regulation 19 consultation with second phases planned to run from Spring 2025 to early summer. It is also acknowledged that “the plan in current draft form covers all local plan matters with the exception of full policy details on the new community proposals”.

### 3.13

It is also stated that “Evidence work, as at early 2025, is ongoing in respect of the new community as well as on other inter-related local plan matters. Once this evidence work is completed, and policy gaps in the plan can be filled in, and further policy refinement undertaken, the second phase of consultation will take place”.

### 3.14

The Plan consultation does not fully accord with Regulation 19 at the time of writing and certainly not by 12th March 2025. In accordance with NPPF Paragraph 234, the plan should therefore be examined under the policies of the current version of the Framework.

### 3.15

Plainly, under normal circumstances, the plan would not have proceeded to Regulation 19 in its current premature and incomplete state and has only been published merely to seek to comply with the Transitional Arrangements set out at NPPF Paragraph 234. This is completely contrived position which wholly disregards the policy and procedural requirement to plan positively.

### 3.16

Moving forward, the Plan should be examined in accordance with the December 2024 NPPF and meet its full housing requirement, having regard to the up-to-date Standard Methodology.

### 3.17

Of particular relevance for this Regulation 19 consultation are the Tests of Soundness, set out at NPPF Paragraph 36, namely, whether the plan is:

(a)

Positively prepared;

(b)

Justified;

(c)

Effective; and

(d)

Consistent with national policy.

3.18

It is Greenhayes position that there is much to be applauded within the Local Plan as currently drafted. However, it plainly does not go far enough to meet the full objectively assessed needs and development requirements of the District in a sound manner.

**Full name:** Dan Yeates

**Organisation (where relevant):** Savills

**Other party name (if relevant):** Sidbury LVA LLP

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** Please see attached reps for figures / appendices in relation to previously uploaded comments

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** CR Down Farming Ltd and Stuart Partners Ltd

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** As can be seen from our tabulated representations, it is our view that the cumulative (and often individual) effect of numerous draft EDLP policies will be to delay and restrict the delivery the number of new homes on

allocated sites. Development viability will also become challenging, which will in turn impact on affordable housing delivery.

This will create growing pressure to release more land for development in order to maintain housing land supply and to meet at least 80% of the identified need, undermining the plan-led approach to delivering new homes and jobs.

As a result, it is considered that the draft EDLP should address this by allocating more land for development, including land for a further sustainable self-contained strategic-scale development in addition to land for a second new community.

As noted above, our clients are promoting a site for such a development in the West End, which the Council acknowledges at paragraph 3.4.1 of the draft EDLP to be an appropriate location to accommodate major new development.

A Vision Statement accompanies these representations. This document is based on detailed technical analysis, including a "Vision-led" transport and access appraisal, a full season of ecology surveys, landscape assessment, arboricultural assessment and a flood risk and surface water drainage assessment. It presents a full constraints and opportunities analysis that culminates in a draft Illustrative Masterplan and land use plan.

## SUMMARY

CarneySweeney submits representations on behalf of CR Down Farming Ltd and Stuart Partners Ltd.

We identify legal and procedural challenges with the Council's approach to plan preparation. These relate to:

- The approach to planning to meet up to 80% of need rather than the entire need or at least 80% of the need.
- Splitting the plan into two parts, with a Regulation 19 consultation on the one part of the plan and a future Regulation 18 consultation on the other part, which relates to a second new community which will be the central plank of the Council's future housing delivery strategy.
- The second new community consultation assuming that the only option for delivering a strategic sustainable new development to meet housing need is via the Council's preferred option site between the A30 and the A3052. It is an option but not the only one. The option being promoted by our client would complement the second new community rather than prejudicing it.

There are also a number of policies that impose technical and other standards that while entirely laudable, have not been properly evidenced or justified and as such are, in themselves, unsound. Furthermore, it is the cumulative (and

often individual) effect of these policies (including those listed below) on scheme viability and overall deliverability that is of significant concern. These include:

- 20% BNG (Policy PB05)
- 110 litres per day restriction (Policy AR02)
- First Homes Standard (Policy CC02)
- BREAM "Excellent" for all non-residential development (Policy CC02)
- Design Code for all major development (Policy DS02)
- Housing design standards (Policy HN04)
- 5% custom and self build (Policy HN05)
- Public open space standards (Policy OS02)
- Bond of 25% of the cost of landscaping (Policy PB09)

A number of other policies introduce policy, procedural requirements and new standards that are not consistent with those in the Framework and PPG. It is considered that these will delay

the submission and determination of planning applications and ultimately delay housing delivery.

As a result, the draft EDLP will delay and restrict housing delivery, such that the allocated sites will not meet the needs identified and the ability of windfall sites to “step in” to meet the shortfall are equally restricted in policy terms.

It has not been demonstrated that the second new community will deliver as the draft EDLP claims and the Council’s experience of the delivery timeline for Cranbrook (30 + years and counting) underlines the challenges that lie ahead. Furthermore, it is considered that the draft EDLP has failed to allocate enough sites to meet local need in full or to have planned positively to meet at least 80% of this need. This suggests strongly that the draft EDLP should either be paused to enable the second new community plans to “catch up” so that the whole draft LP can be considered comprehensively as one, or that more sites should be allocated at this stage to provide sufficient headroom for the significant uncertainties inherent in the draft EDLP.

Our clients are promoting land in the West End to the south of the 2nd new community for a self-contained residential-led, sustainable new village that is viable, sustainable and does not require external funding. It could come forward quickly and would eventually form part of and compliment (rather than prejudice delivery of) the second new community. It is considered that this land should be allocated in the draft EDLP.

We ask to be kept informed of next stages of consultation and also that we have an opportunity to participate in any public examination of this document.

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** DAAB Partnership

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** See attached

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** DAAB Partnership

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Three Dragons Viability Assessment does not appear to have taken account of the pending Building Safety Levy due to come into effect from Autumn 2026. The rate per sqm in East Devon is currently indicated to be £34.06/sqm so would be £3406 for each 100sqm open market dwelling.

This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** DAAB Partnership

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** CarneySweeney acts for DABB Partnership in connection with various land parcels in Whimble which are

being promoted for residential development. CarneySweeney submits the following representations to

East Devon District Council's (EDDC) current consultation on the Local Plan Regulation 19 which closes

at 9am on Monday 31st March 2025.

Our Client:

1. Supports the allocation of Whim\_11 for 33 homes.
2. Supports the allocation for Whim\_08a for 50 homes.
3. Considers that land off Broadyclst Road, Whimble should be allocated for residential development and included within the BUAB.
4. Considers that Policy CC06 (Embodied Carbon) should be deleted or if found sound should be amended to provide greater clarity.
5. Considers that Policy AR02 (Water Efficiency) should be deleted.
6. Considers that Policy HN04 (Accessible and Adaptable Housing) should be amended to include a reduced percentage requirement for M4 (2) dwellings.
7. Considers that Policy HN05 (Self-Build and Custom Build Housing) should be deleted.
8. Considers that Policy PB05 (Biodiversity Net Gain) should be deleted.

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** Obsidian Strategic Asset Management

**Proposal:** 1. Introduction

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This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** WainHomes (South West) Ltd

**Proposal:** 1. Introduction

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Three Dragons Viability Assessment does not appear to have taken account of the pending Building Safety Levy due to come into effect from Autumn 2026. The rate per sqm in East Devon is currently indicated to be £34.06/sqm so would be £3406 for each 100sqm open market dwelling.

This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

We would also question if sufficient allowance has been made for future inflation.

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** Cavanna Homes (Cavanna)

**Proposal:** 1. Introduction

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Viability

The Three Dragons Viability Assessment does not appear to have taken account of the pending Building Safety Levy due to come into effect from Autumn 2026. The rate per sqm in East Devon is currently indicated to be £34.06/sqm so would be £3406 for each 100sqm open market dwelling.

This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** Taylor Wimpey Exeter

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Viability Assessment

There are a number of specific viability queries identified in the above table, but Taylor Wimpey also challenges the amount allowed for professional fees for larger sites.

The Viability Assessment sets professional fees at 6% of build costs for 101 plus unit schemes but our client asserts this should be closer to 10%, with some larger sites likely requiring significantly higher professional fees.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** Taylor Wimpey Exeter

**Proposal:** 1. Introduction

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This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** C G Fry & Son Ltd

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** VIABILITY

The Three Dragons Viability Assessment does not appear to have taken account of the pending Building Safety Levy due to come into effect from Autumn 2026. The rate per sqm in East Devon is currently indicated to be £34.06/sqm so would be £3406 for each 100sqm open market dwelling.

This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** C G Fry & Son Ltd

**Proposal:** 1. Introduction

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**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** C G Fry fully endorses the aspirations of the plan to raise standards and deliver high quality development and good design and the need to assess and mitigate the impacts of development.

However, this is subject to the following caveats:

- All proposed local policies must be justified.
  
  - Potential impacts on viability and deliverability must be properly understood.
  
  - Policies should not seek to unnecessarily replicate the NPPF or Building Regs (or other regulatory regimes).
  
  - Policies should not be drafted in such a way that they hinder or discourage development.
- This land is proposed for 438 dwellings and 1.6 hectares of employment land. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented.
- Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations.

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**Proposal:** 1. Introduction

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**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** OVERVIEW OF THE PLAN APPROACH

We have through earlier representations made on the emerging Local Plan raised concerns regarding the overall strategy of the Plan, particularly in terms of approach to meeting housing needs and an inherent imbalance towards constraint and matters that ultimately constrain growth opportunities and the delivery of sustainable development. Some of those issues unfortunately still remain apparent in the Regulation 19 Plan.

This is despite the Government, through the updated NPPF published in December 2024, making it absolutely clear that there is a need to substantially increase housing delivery in the UK, setting a target of achieving 370,000 new homes each year. The focus of the updated NPPF is explicitly on overhauling the planning system to address the chronic housing crisis and to support “builders not blockers” and to deliver growth.

The implication of the updated NPPF on East Devon is a significantly increased challenge in the number of homes that are required to be built, considerably above past delivery rates. We recognise the scale of this challenge; however, it also must be recognised that historic and substantial undersupply of housing has contributed to the severe housing affordability issues across the South West, including in East Devon.

As we have previously highlighted the continuing housing crisis requires a step change in planning for growth and a departure from traditional protectionism. The updated Framework provides councils with significant tools to maximise opportunities for accommodating the growth that is required.

It is noted that the Council are seeking to benefit from the updated NPPF’s transitional arrangements by publishing a Regulation 19 version of the Plan in advance of the cut off of 12th March 2025. This will then enable the local plan to progress under the December 2023 NPPF. It

is very disappointing that these transitional arrangements appear to have been used with the sole purpose of enabling a lower housing requirement to be pursued.

Which of course will simply continue to increase the gap between housing need and supply in the longer term.

The Plan further fails to appropriately meet local housing needs by seeking to offset even that lower housing requirement by introducing what is an unjustified and inappropriate stepped housing delivery approach.

All this is before taking into account the Plan's over reliance on delivery from a new community that remains largely untested through the Plan process to date; a site selection process that has been inconsistent and potentially procedurally unfair; and a proposed policy basis that seeks unreasonable requirements without any consideration of the viability and deliverability issues they will create.

Importantly until the emerging Plan is adopted, the Council will still be required to demonstrate a 5-year supply of housing land based on the new standard method (1188 dwellings per annum), which as the Council themselves recognise under current claimed supply would be less than 3 years. The need to deliver increased levels of housing must therefore be a priority for the Council both through development management and plan-making processes, requiring a step change in approach towards positively planning for growth rather than focussing on constraint and requirements.

We are concerned the Plan currently fails to adequately demonstrate this.

We elaborate further on the above concerns, that we consider risks undermining the soundness of the Plan if not addressed, when discussing the individual policies and sections of the Plan below.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** To elaborate further on these and previous representations made on the Plan.

**Full name:** James McMurdo

**Organisation (where relevant):** McMurdo Land Planning and Development Ltd

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 20009 Representations on Regulation 19 Plan Mr P and Mrs A Broom

18.

Conclusion

1.

We thank you for the opportunity to comment and trust our views will be take into consideration as the plan progresses.

2.

Reiterating, there are many elements of the plan that our client fully supports (and where we are silent that can be taken to infer support), however, in this response we raise key themes that require attention by EDDC (and ECC) as part of the due process regarding appropriate consultation of the plan, its policies, and proposed allocations.

3.

It is clearly in the interests of everyone that both EDDC and ECC adopt “sound” plans as soon as possible and our client will support the Councils in their aims.

4.

However, the plan is not “sound” as it stands.

**Full name:** James McMurdo

**Organisation (where relevant):** McMurdo Land Planning and Development Ltd

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 1.

On behalf of our client, Stuart Partners Ltd, we submit representations in relation to the East Devon District Council (EDDC)'s Regulation 19 Publication Draft Local Plan 2020 - 2042.

2.

Stuart Partners Ltd owns and controls in excess of 1,000 acres of strategic development land (including land making up a significant part of the new community as proposed for up to 10,000 houses and an expanded Hill Barton Business Park; land making up a significant part of a proposed village between Clyst St George and Clyst St Mary to supplement the new community for up to 2,000 houses; land on which there is a live application for 165 houses as a Phase 3 of the Pinhoe urban extension and the strategically important Hill Barton Business Park) in the "West End" of East Devon. (Please see Appendices 1 – 4).

3.

It is a local company with a diverse business portfolio based around agriculture, land, renewable energy, residential development land and employment land all contributing considerably in excess of 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.

4.

Though the land parcels are in East Devon, they are also relevant to Exeter's Local Plan making too (representations have been made to the Exeter City Council (ECC)'s Regulation 19 Plan).(Representations have been made to all emerging EDDC and ECC plans consultations since 2021).

5.

Whilst there are many elements of the plan that our client fully supports, in this response we raise key themes that require attention by EDDC (and ECC) as part of the due process regarding appropriate consultation of the plan, its policies, and proposed allocations.

6.

It is clearly in the interests of everyone that both EDDC and ECC adopt "sound" plans as soon as possible and our client will support the Councils in their aims. However, the plan is not "sound" as it stands.

7.

These representations should be read together with representations made by Turley on behalf of our client and Bloor Homes Exeter on the proposed new community for up to 10,000 houses and an expanded Hill Barton Business Park and by Carney Sweeney on behalf of our client and Down, on land making up a significant part of a proposed village between Clyst St George and Clyst St Mary to supplement the new community for up to 2,000 houses,.

**Full name:** Lucy Tyrrell

**Organisation (where relevant):** Lympstone Parish Council

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** We believe that the new plan, if adopted, has used unsound reasoning and logic and does not satisfactorily address several strategic policy points. The consultation process itself has been flawed in several aspects and most importantly because it enables Tier 1 targets 'higher levels of development' for Exmouth by classifying Lympstone as a Tier 3 settlement (Lympstone; 'moderate levels of development') changing settlement boundaries and early documentation in the process that did not recommend development to accommodate this (Appendix E).

Lympstone's Spirit of Place will cease as a result of the Tier placement imposed on us and Lympstone will become a suburb of Exmouth. This cannot be a legitimate or sound outcome for a new plan to shape our district and lives for the next twenty years.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** Members of Lympstone Parish Council who are willing to attend the hearing in person are Cllr Lisa Staddon, Cllr Susie Culhane and Cllr Susan Francis.

**Full name:** Lucy Tyrrell

**Organisation (where relevant):** Lympstone Parish Council

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** Throughout the entire process of the development of the new Local Plan, EDDC has used Commonplace Portal and Technology as their preferred method of consultation. They have also given the opportunity to respond directly by email or letter which has been appreciated as the Commonplace software is difficult to use and navigate. Residents have had difficulty using it and indeed a tutorial was posted on how to use it by a resident as the process was so frustrating. Now we have reached the Regulation 19 stage it is once again the preferred method. There are no clear settlement allocation maps within the PDF document. The new interactive Policies map is unclear, and difficult to understand. The use of coloured dotted and dashed areas makes it very difficult to visualise where housing allocations are proposed. It is not possible to search by settlement, parish or town, and the Green Wedge layer is the same colour as the Housing allocation. This is not a clear, transparent, or accessible means of consultation.

Even during the EDDC introductory webinar on 6th February 2025 when the consultation and its process was explained to Councillors, the member of the planning team demonstrating the interactive element had difficulty navigating it to show its layers.

If the chosen means of consultation throughout the process has been and continues to be so non user friendly, can the whole process really be judged as sound?

There have been concerns that the whole process of Consultation has just been a tick box exercise and site allocation rushed to ensure that the Plan could move ahead with the lower centrally imposed housing figures. While, of course, trying to achieve all the necessary processes is desirable to save having even more development and one which we think is generally supported, Parishes can be forgiven for questioning the consultation aim. Is the process to genuinely listen to concerns and address them in the policies and final adopted Plan, or to simply go through the required statutory stages?

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**Full name:** Harriet Fuller

**Organisation (where relevant):** Environment Agency

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** 2.

General Observations

We note that many of the policies have been substantially re-written between the Reg 18 consultation and this Reg 19 consultation. As a general observation, the policies include a lot of text which we would normally expect to be in the supporting text sections, as opposed to the policy itself. There are times where extra explanation is required for clarity which we support. However, we have considered how these policies may be applied by planning officers and in some cases, the text-heavy policies may lead to the key messages/requirement of the policies becoming diluted.

There are a number of policies within the draft whose ambition and strength of wording is somewhat diluted by the inclusion of caveats to policy adherence based on viability. Examples are CC06, CC05, CC02, PB05, HN02, HN03, HN05. Particularly in the case of the first 4 whose ambitions and targets we wholly support, we would advise that rather than highlighting the method by which this policy can be avoided, a single viability policy be included towards the end of the Local Plan covering this point in one place. This allows for the viability case to be made, by exception, whilst strengthening the wording and commitment to those policies by removal of this slightly undermining viability case from the text itself.

For example, the Local Plan could include wording along the lines of: 'The LPA will require robust viability evidence to be submitted where a developer contends that infrastructure requirements, building standards sought, planning obligations, including for affordable housing, or environmental gains would make a proposal economically unviable. In determining whether or not to grant planning permission, the LPA will have regard to the overall economic, social and environmental benefits of the development and whether, on balance, some relaxation of planning obligations/requirements is justified.'

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** DCC requests that the following wording is added to the end of paragraph 1.1 to make clear that the Development Plan includes the Minerals and Waste Local Plans:

“The Development Plan for East Devon includes the Devon Minerals Plan and the Devon Waste Plan, in addition to the East Devon Local Plan.”

**Full name:** Nicola Wilson

**Organisation (where relevant):** Devon County Council

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

**3. Do you consider that this part of the Introduction chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** Overall, Devon County Council (DCC) views the Publication Draft Local Plan to be generally sound, legally compliant and to comply with the duty to cooperate.

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** New Information on BNG and LNRSs

19. As you may be aware the Government recently published additional Guidance on how Local Nature Recovery Strategies should be integrated with/feed into Local Plan Making . This guidance adds further weight to the comments we are making in relation to BNG policies in this Plan.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** We would encourage the Council to review the new guidance and fully consider its implications for this Plan.

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** 16. HBF note that page 4 of the consultation document explains “The plan in current draft form covers all local plan matters with the exception of full policy details on the new community proposals. Evidence work, as at early 2025, is ongoing in respect of the new community (see specifically Strategic Policy WS01 in this plan) as well as on other inter-related local plan matters. Once this evidence work is completed, and policy gaps in the plan can be filled in, and further policy refinement undertaken, the second phase of consultation will take place.

17. HBF note that this Plan is intended to cover the period from 1 April 2020 to 31 March 2042. The NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** 18.

In recognition of the time that it can take to progress a new Local Plan through all its required stages, and the Council’s stated need to undertake a further Reg 19 consultation about matters relating to the new community, HBF consider it is unlikely that that this Plan would be adopted in 2026, and there-fore suggests that the Council should considers extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It will also be important for the evidence base to be consistent with the Plan Period

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** Observations about the Local Development Scheme

15. The Council's own Local Development Scheme , published in Feb 2025, clearly shows two Reg 19 consultation being planned, one that would start before the March 12 deadline which would be able to utilise the transitional arrangements and one that will occur after that cannot. As such HBF believe that if the Council complies with its own LDS, which is a requirement of the planning regulations, it cannot also seek to proceed under the transitional arrangements.

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** 1. Thank you for consulting with the Home Builders Federation (HBF) on the East Devon Local Plan Publication Version (Regulation 19).

2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

3. The HBF have not commented on every policy, only those of relevance to our members

Overarching comments- Concerns about Legal Compliance

Impact of the Dec 2024 revisions to the NPPF

4. The HBF notes a new NPPF including the new standard method for calculating housing need was published alongside the NPPF on 12th Dec 2024. In our view this has implications for the production of the Plan and the policies it contains. The transitional arrangements set out in the NPPF state that 'for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply: the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025 and its draft housing requirement meets at least 80% of local housing need; [or] the plan has been submitted for examination under Regulation 22 on or before 12 March 2025; [or] the plan includes policies to deliver the level of housing and other development set out in a preceding local plan adopted since 12 March 2020 . . . '.

5. The Government's is clear that its overarching housing policy seeks to deliver 1.5 million new homes over the course of the Parliament and the introduction of the new stock-based standard method is intended to result in a significant uptick in the delivery of new homes. For new housing to be delivered within the Parliament, work to support this increase must start immediately.

6. It is the HBF's understanding that the intention of the 80% allowance in the standard method was for it to be a test to be applied to Plans that were an advanced stage of preparation and were progressing and had already set a housing number. If, for these Plans, the housing figures were less than 80% of the new standard method the Council needed to revisit the housing figures but if was 80% or more, then the benefits of continuing with a plan and getting a plan in place, albeit with lower numbers, outweighed the disbenefits of not having a Plan.

7. However, this is not how East Devon Council is attempting to use the regulations. In this Plan the transitional arrangements are being used to try and justify this new Plan only having to plan for 80% of the standard method. The housing requirement has been derived on this basis; the 80% is how the Council have come up with their housing figure, it is not being used as test being applied to an existing housing figure in a well-advanced Local Plan. HBF do not believe that the way East Devon intends to proceed was the intention of the Government's transitional arrangements.

8. The Government Response to the proposed reforms to the NPPF and other changes to the Planning system consultation provides a helpful flow diagram of the transitional arrangements, which is copied below (see Figure 1).

9. Figure One: Transitional Arrangements Flow Diagram

10. This clearly sets out that Plans at Reg 19 stage should be meeting at least 80% of the standard method, not be planning for 80% of the standard method. Other national policy in the NPPF, PPG and elsewhere is clear that the Government seeks to increase house building, and Plans that are only aiming to deliver 80% of their part of the national requirement cannot be consistent with the wider Government housing policy objectives.

11. It is noted that the flow diagram also clearly set out a timeframe for the progression of a Plan under the transitional arrangements. HBF particularly note that the Plan should proceed to Examination within 18 months of 12 March 2025. In this case however this Reg 19 consultation is not the final version of the Plan as it is intended to be published. As the council acknowledge, a further consultation on the policies relating to the new community in the West End is needed. HBF note that if this was a Preferred Options consultation under Reg 18, which is arguably is, the Council would not be able to benefit from the transitional arrangements and even attempt to make an argument that they can plan for only 80% of the new standard method. In our view

this adds further weight to our concerns about the failure of the plan to comply with national policy.

12. The new NPPF therefore provides an important context on the wider Government's objectives around housing, which add further weight to the concerns we have raised about the failure of the East Devon Local Plan fully grasp the challenges of meeting the housing needs and proactively plan to do so. We would suggest that the new requirements and the transitional arrangements underscore that changes are needed to this Plan in relation to housing requirements and its monitoring. In our view such changes will be needed in order for the plan to be found sound.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** 13.

We would ask that the Council fully consider the implications of the new NPPF, the intention of the transitional arrangements, and new standard method on this Plan. In HBF's view, the content of the new NPPF further underlines the importance of the Council taking efforts now to positively plan for the level of housing and infrastructure needed in East Devon, now, and not delay these decisions to sometime in the future. The Government's intentions to meet the housing needs of the nation in full, is very clear, and this is reflected in the transitional arrangements. We would therefore support the Council if they were to choose to take a pause to update their plan to reflect the new housing requirement in full.

14. Both the new (2024), and previous (2023) planning guidance are clear that Local Plans should be proactively planning for their area, which includes helping to address the housing crisis. However, the East Devon Plan is not contributing as much as it could, or should, be to helping to meet this key national housing policy goal. As such the Plan is not doing what it should be to make its contribution to achieving this national policy objective, as such it is currently unsound.

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**Full name:** Kim Miller

**Organisation (where relevant):** Historic England

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Thank you for consulting Historic England on the pre-submission (Regulation 19) East Devon Local Plan, Sustainability Appraisal and associated evidence base documents. As the Government's adviser for the historic environment, we are keen to ensure that conservation and enhancement of heritage assets are taken into account in the preparation of this important Plan.

Paragraph 196 of the National Planning Policy Framework (NPPF), December 2023, explains that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. NPPF paragraph 16(d) states that plans should 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. While we broadly welcome many of the policies and proposals in the East Devon Plan, in particular those policies relating to heritage, landscapes and design, it is important to note at this stage that we have major concerns about some of the proposed site allocations. In addition to this there are a number of general development management policies that we consider unsound, and many others that would benefit from adjustment.

Many of the site allocation policies contain criteria relating to heritage, which respond to the findings of the Historic Environment Site Assessment (within the site selection reports) and/or to our previous comments. We welcome these and have not commented on them all individually. Instead, we have focused our comments on those policies that we consider to be unsound at present, or where adjustments would help to ensure a sound plan and a positive strategy for heritage. Where possible, we would be willing to work with East Devon District Council to try and resolve some of our concerns in advance of the Examination.

NPPF transitional arrangements

In accordance with the transitional arrangements contained in Annex 1 of the NPPF (December 2024) this response is made having regard to the plan-making policies contained in the NPPF (December 2023). However, as decision-making policies in the new NPPF are operative from the day of its publication, we have taken account of these where we consider this to be helpful.

Sustainability Appraisal

We do not wish to comment in detail on the Sustainability Appraisal at this stage. However, please note our comment on its findings in relation to landscape and heritage for Policy CC03.

Infrastructure Delivery Plan

We request that the Council considers adding to the IDP any heritage assets that have been identified as 'at risk' in East Devon, whether on a national or local register. There would be a particularly strong rationale for this, and greater potential for public benefits, in situations where the asset is close to potential areas of new development and population growth and where there are opportunities to secure or improve public access. Historic England's Heritage at Risk Register is available online. For East Devon the register includes Poltimore House, as well as numerous churches and archaeological monuments. Poltimore house is a grade II\* listed building, placing it amongst those assets "of the highest significance" according to the NPPF. The house, along with 13 acres of its grounds, is managed by a charitable trust.

Duty to Cooperate Statement Within the Duty to Cooperate Statement, Table 1 provides a summary of strategic matters along with the Council's view on whether issues raised have been resolved. This correctly identifies that Historic England has raised the potential impact of wind farms on heritage assets (specifically in relation to the identified 'suitable areas') as an issue. However, we do not agree that this matter has been resolved and we therefore ask that this is amended. Please see our detailed response to Strategic Policy CC03. Paragraph 4.26 will also need to be amended.

**Full name:** Steve Havers

**Organisation (where relevant):** National Highways

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Summary

62. National Highways welcome the opportunity to comment on the Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042. The Plan includes significant growth in the West End area located close to the boundary with Exeter City and key SRN routes in the form of the M5 motorway and A30 Trunk Road. Given the scale of planned growth in the West End, National Highways has concern over the potential residual cumulative impacts of new development. The addition of development growth from neighbouring authorities strengthens the need for an ambitious strategy to accommodate future travel demands across the Exeter travel to work area.

We welcome plan objectives to promote sustainable transport and ensure that infrastructure delivery keeps pace with the build-out of site allocations. Nevertheless, we have concern that there is a limited evidence base for the cumulative transport impacts of development in the West End and the Second New Community in particular.

64. National Highways is committed to continue working collaboratively with East Devon District Council and Devon County Council on the development of a Greater Exeter Transport Strategy and transport evidence for the Local Plan and Second New Community. However, on the basis of currently available evidence, we have concern whether identified measures to promote sustainable transport are sufficient to avoid significant impacts on the SRN. For this reason, the Publication Draft plan should be considered unsound, on the basis that the development strategy is not informed by proportionate evidence in respect of potential transport impacts and infrastructure requirements.

65. We look forward to reviewing additional material specific to the Second New Community, which we understand will be forthcoming as part of a separate Regulation 19 consultation event for the proposed allocation. Whilst work to date on the Greater Exeter Transport Strategy has informed the current IDP, subsequent amendments may be required to reflect any future agreement of measures identified as part of the final Transport Strategy and Second New Community assessment work. This could potentially include works to the SRN, which would be likely to require additional public funding.

66. In respect of current policies and the future monitoring and implementation of the Plan, National Highway recommends the adoption of a 'monitor and manage' approach, whereby the outcomes of sustainable transport measures and implications for the operation of the SRN are

monitored going forwards to inform future Local Plan reviews and the phased delivery of the Second New Community site. The Transport Strategy should seek ambitious modal shift and investment in provision for active travel, bus and rail travel, with a view to limiting the need for costly improvements to the SRN which may delay the build-out of planned development growth. We would therefore recommend that policies within the East Devon Local Plan include additional references to the Transport Strategy, uncertainty over required infrastructure improvements and funding, and the need to comprehensively monitor future travel outcomes. These requirements should all inform future reviews of the Local Plan and associated infrastructure planning.

**Full name:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** This explanatory opening section of the plan states that the local plan has reached Regulation 19 stage of production, this being a legally prescribed stage of plan making. It goes on to explain that the Regulation 19 consultation will be conducted in two stages – this first stage which “covers all local plan matters with the exception of full policy details on the new community proposals”, and then a second stage (timetabled to be conducted in May – June 2025 on the Commonplace portal) when “policy gaps in the plan can be filled in, and further policy refinement undertaken” in respect of the proposed new community.

NPPF footnote 82 clarifies what “reaching” the Regulation 19 stage means:

“In this context, “reached Regulation 19” refers to when Regulation 19 has been complied with (ie. when the planning authority has made a copy of each of the proposed submission documents

and a statement of the representations procedure available, and the statements required in Regulation 19(b) have been sent to consultation bodies.”

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states in full:

“Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).”

With reference to NPPF paragraph 234, the local plan has been prepared on the basis that transitional arrangements have been met, given that the plan has reached Regulation 19 stage before 12th March 2025. This allows the plan to be prepared in the context of the previous version of the NPPF and requires the plan to deliver a minimum of 80% of the district’s current local housing need.

The Local Plan Examination Inspector will need to consider whether the plan has reached Regulation 19 stage by 12th March 2025 as a matter of law. This is a gateway test which will inform the Inspector's conclusions on whether the plan can proceed to Examination.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**: Yes, I wish to participate in hearing session(s)

**Full name:** Rob Martin

**Organisation (where relevant):** Clyst Honiton Parish Council

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** REGULATION 19 CONSULTATION – CLYST HONITON PARISH COUNCIL RESPONSE

- Inadequate consultation
- No response from EDDC to date on feedback

Clyst Honiton Parish will be affected by the contents of this plan more than any other parish in East Devon as the bulk of the land allocated for the proposed new settlement takes up all of its land between the A30 and the A3052.

Clyst Honiton Parish Council (CHPC) has been disappointed that EDDC has not engaged with it any more than through the normal 'consultation' phases despite a number of requests from the parish council to do so. From the outset, CHPC has not objected to the principal of the new settlement being included in the local plan because it recognises the need that EDDC has to make provision for a large number of dwellings with few options about where these can go. CHPC did expect therefore that the district council would engage with it in a positive way so that the mistakes of the past at Cranbrook would not be repeated with this new settlement. This has not happened.

In its response to the consultation on the new settlement masterplan proposals, CHPC pointed out a number of matters of concern in relation to its knowledge of the topography of the site and how some of the proposals will not be workable but has received nothing in response. The main aim has been to ensure that this development is driven by sound planning principles driven by planners and the local community, rather than being led by developers given the usual rush to keep up with the build profile. With the one development area providing 10% of the overall total planned for the whole period, failure to get workable and enforceable masterplans completed in time will seriously compromise the vision for the future.

CHPC does understand that this is phase 1 of the Regulation 19 consultation, with more details on the new settlement being introduced at phase 2. There is however concern about the lack of detail included in the plan on this subject, some of which is dealt with below.

There are many policies within this draft of the plan which Clyst Honiton Parish Council agrees with, and other policies that will have no direct effect on it. This response deals with those policies that will have a direct effect on the parish of Clyst Honiton.

**Full name: -**

**Organisation (where relevant): -**

**Other party name (if relevant): -**

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people. The Council may find it insightful to know that a number of the SWHAPC Housing Associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the Local Plan to support CLTs in their choice of sites.

**Full name:** John Loudon

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Chapter 1

Scrutiny of applications of plans at local plan stage is insufficient. To illustrate; the submissions for the local plan were discussed by the planning committee over a few days/numbers of hours. At the end of this process, when insufficient developments had been approved to meet targets, more developments that had been rejected at first consideration were added in. At this stage little detail of the developments are available and committee members seemed to use their 'local knowledge' and 'gut feel'. However, when plans come forward for outline planning permission, the decision is invariable to go ahead as the development 'is in the local plan'. This means that many developments will be approved based on little evidence-based scrutiny at local plan stage and effectively must prove the inappropriateness of the initial approval, which is not surprisingly an uphill struggle. Surely plans should all be thoroughly scrutinized at the point where they are given initial approval which appears to be at local plan stage, as this has become so critical in the overall evaluation process. The opinion given at outline planning stage, is 'if it is the local plan it is happening', this cannot be a fair and appropriate way to evaluate plans, given the current set up. On this basis, the process of evaluation of what will be included into the local plan, needs a major revamp, if in effect it 'green lights' an application through the latter process. I.e. the current evaluation of submissions to the local plan is not fit for purpose and it is unclear how applications that did not meet the local plan timing window are then approached.

If the level of scrutiny at local plan stage is not increased e.g. insufficient details are available, then the assumption that 'if it is the local plan it is happening', needs to be replaced with one that effectively says 'whilst initial high-level evaluation has led to inclusion in the local plan, thorough scrutiny at planning permission stage is able to either give the go-ahead for plans or reject plans based on detailed evaluation'.

**Full name:** Devon Wildlife Trust (planning)

**Organisation (where relevant):** Devon Wildlife Trust

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** GENERAL COMMENTS

We applaud East Devon District Council for its commitment to exceed minimum national levels with regard to Biodiversity Net Gain, however we are disappointed to note that this policy has been weakened since the Draft Local Plan was published. We strongly advise the Council to reinstate the original text, ensuring delivery of substantial net gains for the biodiversity of East Devon and the associated benefits for its population.

We are extremely disappointed to note that policies 89. Policy – Ecological Impact Assessment and 90. Policy – Due consideration of protected and notable species have been removed following publication of the Draft Local Plan. Robust ecological survey is the cornerstone for delivery of the best outcome for wildlife during development. Unfortunately, we commonly review Ecological Impact Assessments that have been submitted as part of a planning application which are well below acceptable standards, resulting in significant negative impacts for biodiversity. If the Council wishes to see the delivery of an ‘outstanding natural environment’ throughout East

Devon, thorough assessment of the existing ecological value of a site followed by detailed measures for enhancement and compensation are required. We strongly urge East Devon District Council to reinstate these two policies.

Whilst we recognise and welcome the inclusion of reference to the environment in discrete sections within the draft Local Plan, we also urge the need for environment, nature, nature recovery and climate to be embedded throughout the plan and given the weight and level of resource needed to deliver this. Throughout the document it is apparent that policies have been written without ecological input, which is often to the detriment of the environment. It is essential that the County Ecologist, or person with similar knowledge and skills, comment on the entirety of

this document to ensure that the importance of nature is woven into each and every section. This is required in order to ensure that the vision for an ‘outstanding natural environment’ becomes a reality. A 'nature everywhere' approach should be reflected within every policy.

The Local Plan should include a specific strategic policy on environment. An outstanding natural environment is one of the stated objectives of the Local Plan and the omission of a strategic policy on this theme is therefore at odds with the stated aims of EDDC.

The accreditation scheme Building with Nature is given a single reference in a policy relating to Clyst Valley Regional Park. Schemes such as Building with Nature can be utilised to demonstrate best practice and should be referenced throughout the document to incentivise use.

## NATIVE SPECIES

We would welcome a commitment to use only native and locally appropriate species for landscape planting, which are locally sourced – from Devon and preferably East Devon - and, to enable this,

a commitment to developing local tree nurseries and seed hubs. These are critical elements of a resilience strategy to climate change and are essential for biodiversity.

## PHOTOGRAPHS

Photos which are utilised throughout the document are an opportunity to demonstrate good practice. Relatively few pictures are utilised in the document and a number of these do not send the right message. In particular, the picture associated with ‘Development in the Towns and Villages’ does not show a single green feature, providing an extremely poor example of the use of green space within towns and villages. Photographs should aim to show good integration of seminatural habitats into developments, with a diversity of habitats included.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:**

- Re-instate original text on BNG;
- Re-instate 89. Policy – Ecological Impact Assessment and 90. Policy – Due consideration of protected and notable species;
- Ensure the County Ecologist, or person with similar knowledge and skills, comments on the entirety of this document so that the importance of nature is woven into each and every section;
- Include a specific strategic policy on environment;
- Schemes such as Building with Nature can be utilised to demonstrate best practice and should be referenced throughout the document to incentivise use.

## NATIVE SPECIES

The Devon Nature Recovery Network Habitat Suitability Mapping describes habitats to a high level of detail which can be used to create suitable species mixes.

## PHOTOGRAPHS

Habitats such as woodland, wetlands and heathlands are part of the wider East Devon landscape and should be fully integrated within developments, providing space for wildlife, adding interest and place-making to developments, providing engagement and wellbeing opportunities with local communities and providing other ecosystems services. It would be good to start this process by including the right messaging within this document.

**Full name:** Philip Wragg

**Organisation (where relevant):** Sid Vale Association

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** PUBLIC CONSULTATION

Initially this was good with public exhibitions and open discussions with planning officers. Latterly there has been very limited consultation with arbitrary decisions made on the choice on Housing and Employment sites.

In this respect please see a copy of the attached original EDDC plan presented in 2022 showing proposed and rejected development sites in the Sid Valley plus the Sid Vale Association's comments at that time (attached below).

Subsequently in October 2024 and after, significant changes on proposed sites were introduced without consultation as follows:

(a) Sidm\_31, Sidford - adjacent to Windsor Mead: This was listed in the original attached plan as a 'Rejected Site' but then popped up without consultation as a new Housing site in September/October 2024;

(b) Sidm\_34 (AKA as 34a & 34b), Sidbury - adjacent to Furzehill: This was listed in the original attached plan as a split site with just the lower smaller area of 34a as being suitable for development. However, it then reappeared without consultation as a new enlarged Housing site - Sidm\_34 (i.e. both 34a and 34b combined) in October 2024.

Another issue has been the poor and simplistic method of communications from the Council. EDDC only facilitates communication through the Commonplace Portal. This only allows simplistic emoji type comments on various proposals with a limited public record of other representations.

By contrast the London Borough of Camden are just slightly ahead of EDDC on their current Local Plan Consultation process yet encourage in addition to 'Commonplace' comments, communication to that Council by email and a hard copy letter. We feel the EDDC's approach dumbs down comments and representations – almost trying to limit objections.

**Full name: -**

**Organisation (where relevant): -**

**Other party name (if relevant): -**

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** The Parish Council...has no reason to believe that it does not meet the legal requirements.

**3. Do you consider that this part of the Introduction chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** The Parish Council's overall conclusion is that it is a sound plan.

**Full name:** Cara Chambers

**Organisation (where relevant):** Stantec

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** 3 National Planning Policy Framework

3.1 National Planning Policy Framework (2024) and Standard Method

3.1.1

A revised National Planning Policy Framework ('NPPF') came into effect in December 2024 alongside a revised Standard Method and annual housing requirement. This revision strengthened the presumption in favour of sustainable development as well as further emphasising the importance of housing delivery.

3.1.2

As a result of the updated Standard Method the annual housing requirement for East Devon has increased from 893 to 1,188 dwellings, which has implications for the immediate five year housing land supply as well as the longer term position set through the emerging local plan.

3.1.3

Annex 1 of the NPPF sets out the transitional arrangements for existing draft Local Plans which have reached at least Regulation 19 stage consultation before 12th March 2025 . Paragraph 234(a) notes that the previous NPPF will apply where the plan has reached Regulation 19 on or before 12th March 2025, and its draft housing requirement meets at least 80% of local housing need. This is the case for the East Devon Local Plan.

**Full name:** Robert Maynard

**Organisation (where relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** 1. Introduction

I would like to draw your attention to the fact that the Local Plan is not legally compliant or sound because it incorporates specialised language, jargon, terminology, and acronyms that may not be familiar to or understood by those who need to interpret or implement the Local Plan.

2. Background

The Local Plan does not define the specialised and technical language employed within the Local Plan or provide an index for the policies.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** 3.

Recommendation

To ensure clarity and comprehension of the Local Plan among all stakeholders, it would be advantageous to incorporate the following:

i) "Glossary of Terms"

This should provide authoritative definitions of the specialised language, jargon, terminology, and acronyms used in the Plan.

ii) An Index of Policies

This should provide a clear index to the policies in the Local Plan.

**3. Do you consider that this part of the Introduction chapter is sound?: No**

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: -**

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.: 1. Introduction**

I would like to draw your attention to the fact that the Local Plan is not legally compliant or sound because it incorporates specialised language, jargon, terminology, and acronyms that may not be familiar to or understood by those who need to interpret or implement the Local Plan.

2. Background

The Local Plan does not define the specialised and technical language employed within the Local Plan or provide an index for the policies.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.: 3. Recommendation**

To ensure clarity and comprehension of the Local Plan among all stakeholders, it would be advantageous to incorporate the following:

i) "Glossary of Terms"

This should provide authoritative definitions of the specialised language, jargon, terminology, and acronyms used in the Plan.

ii) An Index of Policies

This should provide a clear index to the policies in the Local Plan.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: -**

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: -**

**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)

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

**Full name:** Helen S MUNDAY

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 1. Scrutiny of applications of plans at local plan stage is insufficient. To illustrate; the submissions for the local plan were discussed by the planning committee over a few days/number of hours. At the end of this process, when insufficient developments had been approved to meet targets, more developments that had been rejected at first consideration were added in. At this stage little detail of the developments are available and committee members seemed to use their 'local knowledge' and 'gut feel'. However, when plans come forward for outline planning permission, the decision is invariable to go ahead as the development 'is in the local plan'. This means that many developments will be approved on the basis of little evidence-based scrutiny at local plan stage and effectively have to prove the inappropriateness of the initial approval, which is not surprisingly an uphill struggle. Surely plans should all be thoroughly scrutinized at the point where they are given initial approval which appears to be at local plan stage, as this has become so critical in the overall evaluation process. The opinion given at outline planning stage, is 'if it is the local plan it is happening', this cannot be a fair and appropriate way to evaluate plans, given the current set up. On this basis, the process of evaluation of what will be included into the local plan, needs a major revamp, if in effect it 'green lights' an application through the latter process. I.e. the current evaluation of submissions to the local plan is not fit for purpose and it is unclear how applications that did not meet the local plan timing window are then approached.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will**

**need to say why each modification will make this part of the Introduction chapter 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.:** If the level of scrutiny at local plan stage is not increased e.g. insufficient details are available, then the assumption that ‘if it is the local plan it is happening’, needs to be replaced with one that effectively says ‘whilst initial high-level evaluation has led to inclusion in the local plan, thorough scrutiny at planning permission stage is able to either give the go-ahead for plans or reject plans based on detailed evaluation’.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** I have examples of lack of soundness that I can present if helpful

**Full name:** Dr Paul Bridge

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Aminster Neighbourhood Steering Group submitted detailed comments on the sites selected in 2023. These included comments on the unsuitability of sites GH/ED/SOa, Axm\_02, -08 and -09. They also asked for justification for the rejection of sites close to the route proposed for the Axminster Relief Road - see 11.10. There does not appear to be an evidence in the document that these concerns were addressed.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** "actively supports" appears inappropriate given the lack of response

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** As above. There has been a lack of feedback to community

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: -**

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

**Full name:** Jo Wilkins

**Organisation (where relevant):** Somerset Council

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** The comments in this response focus on matters relating to strategic cross-boundary issues. They should be read in conjunction with the submissions on behalf of the former South Somerset District Council in January 2023 in response to the Consultation Draft Plan (Regulation 18) and those submitted on behalf of Somerset Council in response to the Further Consultation in June 2024.

**Full name:** Dee Woods

**Organisation (where relevant):** Otter Valley Association

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Use of 'significant' and 'substantial' in policies. These terms need to be defined with specific criteria, which must recognise the differences in impact/effect in different locations, such as between towns and villages. Difficulty in interpretation.

**Full name:** Nathan Budd

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** The Introduction chapter is not legally compliant for several reasons:

It does not adequately address the legal requirements for sustainable development as outlined in the National Planning Policy Framework (NPPF). Specifically, it fails to ensure that the proposed development will not lead to unacceptable levels of pollution, and it does not demonstrate how the plan will contribute to improving the environment.

The repeated discharge of raw sewage into the sea by Southwest Water highlights a severe infrastructure deficit and environmental problem. The Introduction does not provide a credible strategy to resolve this issue, nor does it demonstrate how new development will be supported by adequate and improved infrastructure. This lack of a robust plan to address existing environmental and infrastructure failures renders the Introduction legally unsound.

The lack of specific wording within the Introduction chapter detailing compliance with the Duty to Cooperate (e.g., paragraphs 1.9 onwards) is a key concern. There is an absence of explicit reference to how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's strategy within the Introduction. The general statements regarding national policy and sustainable development are not substantiated with clear commitments to addressing known infrastructure deficits.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** o make the Introduction chapter legally compliant, the following modifications are necessary:

1. Explicitly Acknowledge and Address Infrastructure Deficits:

Modification: Add a new paragraph to the Introduction that explicitly acknowledges the existing infrastructure deficits, particularly concerning sewage management, and commits to addressing these issues before further development.

Suggested Revised Wording:

"East Devon faces significant challenges in ensuring that its infrastructure can support existing and future development. There are known deficits, particularly in the capacity of the sewage infrastructure, as evidenced by the frequent discharge of untreated sewage. Addressing these deficits is a critical priority. This Local Plan commits to a strategy of 'infrastructure first,' ensuring that necessary upgrades and improvements to infrastructure, including sewage systems, are planned, funded, and delivered before new development proceeds. We will work with relevant agencies, including Southwest Water, to secure these improvements and ensure that development is sustainable and does not harm the environment or public health."

Why this modification will make the Introduction legally compliant: This addition will directly address the legal requirement to ensure that development is sustainable and does not lead to unacceptable pollution. By acknowledging the problem and committing to a solution, the Introduction will demonstrate that the plan is taking the necessary steps to meet its legal obligations under the NPPF.

2. Strengthen Commitment to Environmental Protection:

Modification: Enhance the language regarding environmental protection to include a commitment to measurable improvements in environmental quality, particularly regarding water quality.

Suggested Revised Wording:

"This Local Plan is underpinned by a strong commitment to protecting and enhancing East Devon's outstanding natural environment. This commitment goes beyond simply mitigating harm; it includes a proactive approach to achieving measurable improvements in environmental quality. Specifically, we will ensure that development contributes to the improvement of water quality and the reduction of pollution. Policies within this plan will require developers to demonstrate how their proposals will support these environmental goals, and we will work with partners to monitor and enforce these requirements."

Why this modification will make the Introduction legally compliant: This change will align the Introduction more closely with the legal requirements to protect and improve the environment.

By focusing on measurable improvements, the plan will provide a clearer and more robust framework for ensuring environmental sustainability.

### 3. Include a Framework for Monitoring and Review:

Modification: Add a section outlining how the delivery of infrastructure improvements and environmental targets will be monitored and reviewed, with clear mechanisms for taking corrective action if necessary.

Suggested Revised Wording:

"To ensure the effective delivery of infrastructure improvements and the achievement of environmental targets, this Local Plan includes a robust framework for monitoring and review. This framework will include:

Regular monitoring of infrastructure capacity and performance, including sewage infrastructure.

Tracking of key environmental indicators, such as water quality.

Annual reporting to the community on progress.

Mechanisms for taking corrective action if targets are not being met or if unforeseen issues arise. This monitoring and review process will ensure transparency and accountability, and it will enable the Council to adapt the plan if necessary to ensure that its objectives are achieved."

Why this modification will make the Introduction legally compliant: This addition will provide a mechanism for ensuring that the plan remains responsive to changing circumstances and that its objectives are achieved. It will also enhance transparency and accountability, which are essential for demonstrating legal compliance.

These modifications will make the Introduction chapter legally compliant by:

Demonstrating a clear commitment to addressing infrastructure deficits.

Strengthening the plan's focus on environmental protection and improvement.

Establishing a framework for monitoring and review to ensure accountability and effectiveness.

Detailing compliance with the Duty to Cooperate by providing evidence of effective engagement with relevant bodies, particularly regarding strategic infrastructure issues such as wastewater management.

Explicitly referencing how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's strategy.

Substantiating general statements regarding national policy and sustainable development with clear commitments to addressing known infrastructure deficits.

By incorporating these changes, the Introduction will provide a sounder basis for the Local Plan and ensure that it meets its legal obligations under the NPPF.

**3. Do you consider that this part of the Introduction chapter is sound?: No**

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.: -**

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Introduction chapter, and the Local Plan in general, is unsound due to its failure to adequately address the critical issue of insufficient wastewater infrastructure and its implications for sustainable development.

The Introduction chapter is unsound because it fails to meet the test of being 'positively prepared' and 'justified.'

he plan does not proactively address the existing and well-documented deficiencies in wastewater infrastructure in areas like Exmouth. It does not set out a clear strategy for ensuring that development is aligned with infrastructure improvements, nor does it acknowledge the severe environmental consequences of continued sewage discharges.

The plan's approach to development is not justified by robust evidence. It does not adequately consider the capacity constraints of the wastewater network, the environmental impact of sewage pollution, or the deliverability of necessary infrastructure upgrades within the plan period. The plan proceeds with housing allocations despite clear evidence that the necessary infrastructure is not in place or guaranteed.

This unsoundness is particularly evident in its lack of emphasis on and strategy for dealing with the wastewater infrastructure deficit, making the plan unsustainable and environmentally damaging.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** To make the Introduction chapter sound, the following modifications are necessary:

1. Strengthen the Infrastructure Commitment:

Modification: Include a detailed section that outlines a commitment to prioritizing and delivering necessary infrastructure, with a specific focus on addressing the wastewater infrastructure deficit.

Suggested Revised Wording:

"The Local Plan recognizes that sustainable development can only be achieved with adequate infrastructure. There are significant challenges in East Devon with regards to existing infrastructure capacity, most notably in the management of wastewater. To address this, the plan adopts an 'Infrastructure First' principle. Development will be strictly contingent on the delivery of necessary infrastructure improvements. This includes a commitment to work with Southwest Water and other relevant agencies to secure funding and implement a program of upgrades to wastewater infrastructure. The Introduction will also detail how the delivery of infrastructure will be monitored, and how shortfalls will be addressed to ensure that development does not proceed without the necessary infrastructure in place."

Why this modification will make the Introduction sound: This will provide a clear and strong commitment to addressing a critical infrastructure deficit. It will demonstrate that the plan is not only aspirational but also grounded in a realistic and deliverable strategy.

2. Enhance the Duty to Cooperate Explanation:

Modification: Expand the section on the Duty to Cooperate to provide specific examples of how the Council has engaged or will engage with relevant bodies, particularly concerning strategic infrastructure and environmental issues.

Suggested Revised Wording:

"East Devon District Council is committed to fulfilling its Duty to Cooperate. This commitment is central to addressing strategic issues that cross administrative boundaries. The Council has engaged and will continue to engage with [list specific bodies, e.g., Southwest Water, Environment Agency, neighboring authorities] to ensure that the Local Plan effectively addresses strategic matters. This cooperation includes joint working on the planning and delivery of strategic infrastructure, including wastewater management solutions, and coordinated approaches to environmental protection and enhancement. The Introduction will provide further detail on the mechanisms for ongoing cooperation and how the outcomes of this cooperation have shaped the plan."

Why this modification will make the Introduction sound: This will demonstrate that the plan is based on effective collaboration and that strategic issues have been properly considered and addressed through joint working.

### 3. Provide Measurable Targets and Monitoring Framework:

Modification: Include a section that outlines how the plan's objectives, particularly those related to infrastructure and environmental improvements, will be monitored and measured, with clear targets and mechanisms for review and corrective action.

#### Suggested Revised Wording:

"To ensure the effective delivery of the plan's objectives, the Introduction establishes a framework for monitoring and review. This framework will include:

Specific, measurable, achievable, relevant, and time-bound (SMART) targets for infrastructure delivery and environmental improvements, including targets for the reduction of sewage discharges.

Regular monitoring of key indicators, such as infrastructure capacity, water quality, and environmental quality.

Annual publication of monitoring reports to ensure transparency and accountability.

Mechanisms for reviewing the plan and taking corrective action if targets are not being met or if new challenges arise.

This framework will ensure that the plan remains responsive and that progress towards its objectives is effectively tracked and managed."

Why this modification will make the Introduction sound: This will ensure that the plan's objectives are not just aspirational but are backed by a robust system of monitoring and accountability. It will provide confidence that the plan can adapt to changing circumstances and deliver its intended outcomes.

### 4. Strengthen Integration of Infrastructure in the Spatial Strategy:

Modification: Revise the Introduction to explicitly articulate how infrastructure delivery, especially wastewater infrastructure, is integrated into the plan's spatial strategy.

Suggested Revised Wording:

"The spatial strategy of this Local Plan is fundamentally linked to the delivery of necessary infrastructure. The plan directs development to sustainable locations, but this direction is contingent on the provision of adequate infrastructure. In particular, the plan recognizes the critical importance of wastewater infrastructure. The spatial strategy prioritizes development in areas where infrastructure capacity exists or can be realistically provided. It also sequences development to align with infrastructure delivery, ensuring that development does not outpace the provision of essential services. The Introduction will provide an overview of how infrastructure considerations have shaped the spatial strategy and how the plan will ensure that development and infrastructure are delivered in a coordinated manner."

Why this modification will make the Introduction sound: This will demonstrate that infrastructure is a key driver of the plan's spatial strategy, ensuring that development is located in areas where it can be supported by necessary services.

By incorporating these changes, the Introduction chapter will be significantly strengthened, providing a sounder basis for the Local Plan and ensuring that it is more likely to achieve its objectives in a sustainable and effective manner.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** The Introduction chapter fails to comply with the Duty to Cooperate for the following reasons:

The references to cooperation with other bodies are general and aspirational, lacking specific details of how the Council has engaged or will engage with relevant authorities and stakeholders on strategic issues.

There is insufficient detail on how the plan has been shaped by effective joint working with neighboring authorities, statutory bodies, and service providers, particularly concerning cross-boundary issues such as infrastructure delivery and environmental impacts.

While the plan mentions the importance of working with partner bodies to secure better facilities, including schools and medical services, it does not provide evidence of effective cooperation to address existing deficits or ensure that new development is supported by necessary infrastructure.

The Introduction's treatment of the Duty to Cooperate does not adequately demonstrate how the Council has worked with Southwest Water to address the significant issue of wastewater management and sewage discharges, a matter that requires strategic, collaborative solutions.

The plan highlights the importance of the new community development and its strategic implications, but it does not provide sufficient detail on how the Duty to Cooperate has been fulfilled in planning for this development, which necessitates close cooperation with various agencies and neighboring authorities.

In summary, the Introduction chapter lacks the necessary evidence and specific commitments to demonstrate that the Duty to Cooperate has been properly addressed, particularly in relation to strategic matters that require ongoing collaboration and joint working.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: -**

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

**Full name:** Robert Maynard

**Organisation (where relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** 1. Introduction

I would like to bring to your attention that the six-week duration of Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: “Legally non-compliant” and “unsound”.

2. Background Information

The Regulation 19 consultation was published on Thursday, 13 February 2025, with a deadline for comment by 9:00 a.m. on Monday, 31 March 2025 (i.e. 6 weeks, 3 days).

This was the first planned phase of the Regulation 19 Consultation for the full local plan, all content, bar selected elements applicable to the development of policy for the new town proposals (a second new town over and above Cranbrook).

According to the East Devon Development Plan Scheme (published Feb 2025), a second phase of the Regulation 19 Consultation is planned for the Spring 2025 through to early summer, specifically on new town matters. (This is due to an ongoing master planning work for the new town and a cross-local authority transport study not being concluded until Spring 2025.)

EDDC proposes to submit the plan for examination in Autumn 2025.

The Statement of Community Involvement (Adopted January 2021) indicates that a Local Plan and other DPDs require a minimum of 6 weeks for the consultation document stage.

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to publish a draft Local Plan for public consultation before submission for examination. While the regulations specify a minimum consultation period of six weeks, they do not mandate a maximum duration. Therefore, local planning authorities have the discretion to extend the consultation period beyond six weeks if they choose.

### 3. Six-week Regulation 19 consultation not sound

EDDC's first planned Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: "Legally non-compliant" and "unsound" for the following reasons:

1) The consultation period is insufficient for organisations, interest groups, and the public to engage with the intricate details of comprehending and responding to the Local Plan. In accordance with the Gunning 2nd Principles, there must be ample opportunity for consultees to participate in the consultation. For further reference, please visit:

<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

2) In terms of the length of Regulation 19 Consultation - the District Council had discretion to extend the period beyond six weeks if they chose to do so. If they had extended the length of the consultation to 12 weeks. This would have provided consultees with a more realistic opportunity to comment on the Local Plan.

3) In view of this being the first (of 2) planned Regulation 19 Consultations, the consultation could have been at least 12 weeks (even if it overlapped with the second planned phase of Regulation 19 Consultation).

4) No extra allowance was made for the half-term week during the consultation period.

5) No allowance was made for other EDDC consultations clashing with the consultation, such as the 6-week Consultation on the East Devon National Landscape Management plan 2025–2030 (deadline 18/04/2025).

6) The Regulation 19 Consultation is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, until Sunday, January 15th, 2023.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:**

Recommendation

As the local plan consultation process appears to be “legally non-compliant” and “unsound,” the District Council should:

1. Delay approving the Regulation 19 Local Plan for submission to the Planning Inspectorate, due to inadequate public consultation (Gunning Principles).
2. Address the identified inadequacies of the consultation issues.
3. Consider withdrawing and revising the plan.
4. Consider starting the plan-making process anew.

**3. Do you consider that this part of the Introduction chapter is sound?: No**

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 1. Introduction

I would like to bring to your attention that the six-week duration of Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: “Legally non-compliant” and “unsound”.

2. Background Information

The Regulation 19 consultation was published on Thursday, 13 February 2025, with a deadline for comment by 9:00 a.m. on Monday, 31 March 2025 (i.e. 6 weeks, 3 days).

This was the first planned phase of the Regulation 19 Consultation for the full local plan, all content, bar selected elements applicable to the development of policy for the new town proposals (a second new town over and above Cranbrook).

According to the East Devon Development Plan Scheme (published Feb 2025), a second phase of the Regulation 19 Consultation is planned for the Spring 2025 through to early summer, specifically on new town matters. (This is due to an ongoing master planning work for the new town and a cross-local authority transport study not being concluded until Spring 2025.)

EDDC proposes to submit the plan for examination in Autumn 2025.

The Statement of Community Involvement (Adopted January 2021) indicates that a Local Plan and other DPDs require a minimum of 6 weeks for the consultation document stage.

Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to publish a draft Local Plan for public consultation before submission for examination. While the regulations specify a minimum consultation period of six weeks, they do not mandate a maximum duration. Therefore, local planning authorities have the discretion to extend the consultation period beyond six weeks if they choose.

### 3. Six-week Regulation 19 consultation not sound

EDDC's first planned Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders and may be: "Legally non-compliant" and "unsound" for the following reasons:

1) The consultation period is insufficient for organisations, interest groups, and the public to engage with the intricate details of comprehending and responding to the Local Plan. In accordance with the Gunning 2nd Principles, there must be ample opportunity for consultees to participate in the consultation. For further reference, please visit:

<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

2) In terms of the length of Regulation 19 Consultation - the District Council had discretion to extend the period beyond six weeks if they chose to do so. If they had extended the length of the consultation to 12 weeks. This would have provided consultees with a more realistic opportunity to comment on the Local Plan.

3) In view of this being the first (of 2) planned Regulation 19 Consultations, the consultation could have been at least 12 weeks (even if it overlapped with the second planned phase of Regulation 19 Consultation).

4) No extra allowance was made for the half-term week during the consultation period.

5) No allowance was made for other EDDC consultations clashing with the consultation, such as the 6-week Consultation on the East Devon National Landscape Management plan 2025–2030 (deadline 18/04/2025).

6) The Regulation 19 Consultation is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, until Sunday, January 15th, 2023.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** 4. Recommendation

As the local plan consultation process appears to be “legally non-compliant” and “unsound,” the District Council should:

1. Delay approving the Regulation 19 Local Plan for submission to the Planning Inspectorate, due to inadequate public consultation (Gunning Principles).
2. Address the identified inadequacies of the consultation issues.
3. Consider withdrawing and revising the plan.
4. Consider starting the plan-making process anew.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** Six-week Regulation 19 consultation fails to provide adequate time for organisations to comply with the duty to cooperate.

EDDC's first planned Regulation 19 Consultation provides inadequate time for thorough consideration and feedback from stakeholders for the following reasons:

1) The consultation period is insufficient for organisations, interest groups, and the public to engage with the intricate details of comprehending and responding to the Local Plan. In accordance with the Gunning 2nd Principles, there must be ample opportunity for consultees to participate in the consultation. For further reference, please visit:  
<https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf>

2) In terms of the length of Regulation 19 Consultation - the District Council had discretion to extend the period beyond six weeks if they chose to do so. If they had extended the length of the consultation to 12 weeks. This would have provided consultees with a more realistic opportunity to comment on the Local Plan.

3) In view of this being the first (of 2) planned Regulation 19 Consultations, the consultation could have been at least 12 weeks (even if it overlapped with the second planned phase of Regulation 19 Consultation).

4) No extra allowance was made for the half-term week during the consultation period.

5) No allowance was made for other EDDC consultations clashing with the consultation, such as the 6-week Consultation on the East Devon National Landscape Management plan 2025–2030 (deadline 18/04/2025).

6) The Regulation 19 Consultation is considerably less than the initial 10-week Local Plan Consultation undertaken between Monday, November 7th, 2022, until Sunday, January 15th, 2023.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** To ensure the issue is considered and provide additional evidence as necessary

**Full name:** jane moffatt

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** You state that Neighbourhood plans will be adhered to, but in the Strategic planning stage, you ignored the Lymptone Neighbourhood plan even though your council has held it up as a gold star plan. You stated that you would ignore the NP's built up boundary, the fundamental statement that the village did not want coalescence with Exmouth and wanted to keep it's sense of spirit and individual identity. You ignored the importance of the sites being in the Coastal Preservation Zone and stated that you were intentionally ignoring this.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** In 1.10 - 1.13 You state that Neighbourhood plans will be adhered to, but in the Strategic planning stage, you ignored the Lymptone Neighbourhood plan even though your council has held it up as a gold star plan. You stated that you would ignore the NP's built up boundary, the fundamental statement that the village did not want coalescence with Exmouth and wanted to keep it's sense of spirit and individual identity. You ignored the importance of the sites being in the Coastal Preservation Zone and stated that you were intentionally ignoring this. You also wouldn't let representatives of the Parish council speak on a site adjacent to the parish boundary which would have immense ramifications for the village. Do you think your statement that you took account of Parishes' wishes and their published NPs would hold up as being sound?

The process concerning Exmouth, Woodbury and Lymptone, the tiering of these settlements and the move to coalesce Lymptone and Exmouth through the blurring of 'settlements' and

'administrative districts' has been disingenuous at the very least and anti-democratic concerning the so-called 'consultation' with the relevant Parish Councils. Lymptone Village and parish will have a 28% increase in housing stock and coalesce with Exmouth although the numbers of houses attributed to Lymptone appears far less as these sites have been attributed to Exmouth even though in Lymptone parish. Is this honest and true cooperation? I think not.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.: -**

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** absolutely not! You state that Neighbourhood plans will be adhered to, but in the Strategic planning stage, you ignored the Lymptone Neighbourhood plan even though your council has held it up as a gold star plan. You stated that you would ignore the NP's built up boundary, the fundamental statement that the village did not want coalescence with Exmouth and wanted to keep it's sense of spirit and individual identity. You ignored the importance of the sites being in the Coastal Preservation Zone and stated that you were intentionally ignoring this.

Strategic meetings were long and to those watching the process, they seemed bullying and aggressive. You went against your own strategies for preservation of agricultural land, coastal areas, green wedges and the wishes to stop coalescence of villages into bigger conurbations. You ignored the fundamental wishes of residents and communities to preserve the rural landscape and failed to recognised or hear that tourism and agriculture are major parts of the local economy and also why people choose to live here. You were focused on numbers not lifestyle.

**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)

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

**Full name:** Lewis Carr

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** At the very heart of this document, there is a desire to increase the number of houses that can be built in East Devon, because you've already given permission for more than were allowed in the Plan running to 2031.

So you're looking to extend the period and add in more housing that you'll likely chew through in the next few years anyway.

It's a joke, and should not be allowed.

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** How about you start planning for life after the current plan ends in 2031?

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

**4(a). If yes, and you wish to support this part of the Introduction chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** As mentioned above, you're not keeping to the Plan running until 2031.

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** You're not representing the constituents who voted in the Plan ending 2031

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** So I can hear from real people and see whether they can look me in the eye, and tell me they think they are serving their constituents by going back on what was promised in the Plan ending in 2031.

**Full name:** Dave Jones

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** Another fake consultation exercise. EDDC have ignored residents every step of the way, forcing unwanted development and the destruction of green space.

EDDC is negligently causing local services to be overrun by allowing more and more development without demanding the right infrastructure.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** Investigate those responsible.

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** Lots of co-operation with developers but not with local residents .

**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)

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

**Full name:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** There is little or no mention across any of the areas in the report about ensuring all infrastructure will be provided

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** I refer to a need for

Roads/ transport

Schools

Doctors/ hospitals

Water provision

Sewage treatment

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** No one is enforcing the environmental requirements ensuing from more building

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** See above. Where and how will environmental compliance be guaranteed, and infrastructure supplied

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** -

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: -**

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: -**

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

**Full name:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.11

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** The current Exmourh neighbourhood plan that was agreed by the community and implemented in 2019 has not been used in creating this document. If so there would be no potential development in the National Lsndscape, Exmo\_17 which is outside the agreed BUAB.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** Use current neighbourhood plans and listen to the community views and opinions.

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Current neighbourhood plans have not been recognised in guiding this document.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** -

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: -**

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

**Full name:** Suzanne Hales

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.12

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** Local communities have not been consulted enough and why does it say that Neighbourhood plans may be superseded by developers.

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** All existing parishes and communities will have had full consultation and local knowledge will be taken account of.

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** -

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: -**

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

**Full name:** Owen Jones

**Organisation (where relevant):** LRM Planning

**Other party name (if relevant):** David Wilson Homes

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.3

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 4.1 As set out in national planning policy1, strategic policies should look ahead over a minimum 15-year

period from the date of the adoption of the Local Plan. In addition, planning law requires the preparation of a Local Development Scheme, which must specify the development plan documents

that, once prepared, will comprise the development plan for the area. The same section of the 2004

Planning Act requires local planning authorities to provide a timetable for the preparation and revision of development plan documents and for local planning authorities to provide up-to-date

information showing the “state of the authority’s compliance (or noncompliance) with the timetable...”

4.2 The latest Local Development Scheme (February 2025) forecasts adoption of the Plan in late 2026. If

that occurred, there would be just over 15 monitoring years after adoption and therefore the national planning policy requirement would be met.

4.3 However, between the current consultation and adoption, there are the following likely stages of

plan preparation:

? a further Regulation 19 consultation;

? Submission;

? the appointment of the examining Planning Inspector(s) and the Programme Officer by the Planning Inspectorate;

? the scheduling of the Hearing Sessions;

? the preparation of Hearing Statements;

? the Hearing Sessions;

? proposed Main Modifications (likely to be required), with supporting technical information;  
? publication of the Inspector's Report;  
? to seek the recommendation of the Strategic Planning Committee for the Plan to be Adopted;  
and  
? the Plan to be adopted by Full Council.

4.4 It is considered highly ambitious for the stages of work listed above to be undertaken in the 21

month period allowed for in the Local Development Scheme.

4.5 The most obvious benchmark is the recently adopted Cranbrook Plan. In that case, the Local Planning Authority submitted the Plan to the Secretary of State for Examination on 2nd August 2019. The Hearing Sessions, which were divided into two stages, commenced on 21st January 2020

and ended on 20th November 2023. A further consultation concerning viability was undertaken in

July and August 2021, with the Proposed Main Modifications published in January 2022. The Inspector's Report was published in August 2022, with the Development Plan Document being adopted on 14th September 2022. Consequently, it took over three years from the Submission of the

Cranbrook Plan to its adoption. Even allowing for the delays resulting from the Covid-19 pandemic,

the period from the Submission of the Plan took significantly longer than the timeframe that has been allowed by the Local Development Scheme.

1 Para. 22

EAST DEVON LOCAL PLAN PUBLICATION DRAFT CONSULTATION 15

4.6 Consequently, to ensure that the plan is consistent with national policy and is therefore a sound

proposition, the Local Planning Authority must ensure that the plan period covers a 15-year period

from the date of adoption. This is likely to require, for the reasons set out above, the plan period to

be extended by at least a further year (i.e. to 2043).

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** 4.1 As set out in national planning policy<sup>1</sup>, strategic policies should look ahead over a minimum 15-year

period from the date of the adoption of the Local Plan. In addition, planning law requires the preparation of a Local Development Scheme, which must specify the development plan documents

that, once prepared, will comprise the development plan for the area. The same section of the 2004

Planning Act requires local planning authorities to provide a timetable for the preparation and revision of development plan documents and for local planning authorities to provide up-to-date

information showing the “state of the authority’s compliance (or noncompliance) with the timetable...”

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that occurred, there would be just over 15 monitoring years after adoption and therefore the national planning policy requirement would be met.

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plan preparation:

? a further Regulation 19 consultation;

? Submission;

? the appointment of the examining Planning Inspector(s) and the Programme Officer by the Planning Inspectorate;

? the scheduling of the Hearing Sessions;

? the preparation of Hearing Statements;

? the Hearing Sessions;

? proposed Main Modifications (likely to be required), with supporting technical information;

? publication of the Inspector’s Report;

? to seek the recommendation of the Strategic Planning Committee for the Plan to be Adopted;

and

? the Plan to be adopted by Full Council.

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July and August 2021, with the Proposed Main Modifications published in January 2022. The Inspector's Report was published in August 2022, with the Development Plan Document being adopted on 14th September 2022. Consequently, it took over three years from the Submission of the

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the period from the Submission of the Plan took significantly longer than the timeframe that has been allowed by the Local Development Scheme.

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EAST DEVON LOCAL PLAN PUBLICATION DRAFT CONSULTATION 15

4.6 Consequently, to ensure that the plan is consistent with national policy and is therefore a sound

proposition, the Local Planning Authority must ensure that the plan period covers a 15-year period

from the date of adoption. This is likely to require, for the reasons set out above, the plan period to

be extended by at least a further year (i.e. to 2043).

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** Due to the significant policy issues concerned.

**Full name:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.3

**3. Do you consider that this part of the Introduction chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** Tetlow King Planning as an agent on behalf of the South West Housing Association Planning Consortium (SWHAPC)

Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the South West region.

As significant developers and investors in local people, the SWHAPC is well placed to contribute to Local Plan objectives and act as long-term partners in the community. Our clients play an active role in affordable housing delivery in East Devon and so we welcome this opportunity to comment on the East Devon Local Plan Consultation Regulation 19. The Regulation 19 Publication Draft of the Local Plan follows the further consultation on the Regulation 18 Draft held in 2024 in which eight issues were addressed not considered to have been fully addressed in the original Regulation 18 consultation.

The SWHAPC notes that the plan period has been extended from 2020-2040 to 2020-2042, and that the draft Local Plan will be subject to further refinement and consultation anticipated to run between spring and summer in advance of examination in autumn 2025. The SWHAPC supports the extension of the plan period as it should help to provide greater long-term strategic direction for development, particularly with regard to infrastructure.

About this consultation

Page 5 of the document outlines the implications of recent national planning reforms and sets out that because the East Devon Plan progressed to Publication Plan (Regulation 19) stage before the updated National Planning Policy Framework (NPPF) was published, the emerging Plan accords with the December 2023 version of the NPPF. The SWHAPC agrees with this consensus and is satisfied with the justification provided in the Publication Plan.

**Full name:** Nick Freer

**Organisation (where relevant):** David Lock Associates Ltd

**Other party name (if relevant):** Hallam Land and Taylor Wimpey (in respect of Cranbrook)

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.4

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 1 Hallam Land and Taylor Wimpey have worked in partnership, and with others, to promote and secure the delivery of Cranbrook, with the first phase of some 3500 new homes (and which includes two new primary schools, secondary school, new railway station, ecology park, country park, district centre and most recently town centre), nearing completion. The outline planning permission was issued in October 2010.

2 Hallam and Taylor Wimpey remain committed to the ongoing implementation of the next phases of Cranbrook specifically:

- the western expansion of Cranbrook (known as Bluehayes), East Devon District Council having resolved to grant consent for up to 870 new homes within the Bluehayes expansion area in June 2023 (application reference – 19/0620/MOUT); and
- the final parcels within the town centre in their control – for a limited number of additional dwellings with planning applications due to be considered shortly by the Council.

3 Hallam and Taylor Wimpey had not anticipated the new East Devon Local Plan (2042) would impinge upon the continued progress of the proposals set out above – primarily because of the time invested in the Cranbrook Plan – adopted only in 2022. This remains their understanding but Hallam and Taylor Wimpey consider that there is a need for the emerging East Devon Local Plan to be completely clear in this respect. Hallam and Taylor Wimpey have made the following representations on the basis that there is a degree of ambiguity in the Local Plan's treatment of Cranbrook and its relationship with The Cranbrook Plan.

4 The nature of the comments is such that representations could be duplicated in respect of many of the policies of the Local Plan. For simplicity, but also the avoidance of doubt, Hallam and Taylor Wimpey's comments are in respect of Cranbrook and tied for convenience to para

1.4 of the new Local Plan which describes the relationship between Local Plan and Cranbrook Plan policies. The consequence of the representations that the tailpiece sentence in relation to many of the Local Plan policies (describing if or how the policy should apply to the Cranbrook Plan Area) should be reviewed on a case by case basis through the plan.

## Ambiguity

5 Whilst recognising the complexity which results from the preparation of the Local Plan whilst the Cranbrook Plan remains extant, Hallam and Taylor Wimpey consider that the approach set out in the Draft East Devon Local Plan to 2042 generates uncertainty and is overly complex.

6 On the one hand, para 1.4 of the Local Plan 2042 is clear that once the new Local Plan is adopted, the Development Plan will continue to include Cranbrook Plan (which was adopted only in 2022 and provided a comprehensive development framework for the growth of Cranbrook and for development in general in the Cranbrook Plan Area). Indeed Para 1.4 of the draft Local Plan affirms that it is the “Cranbrook Plan”, not the new Local Plan, that is “the primary plan for determining planning applications at Cranbrook”.<sup>7</sup> However, the introduction to the draft Local Plan equally states that “many policies in this new local plan will also apply within the Cranbrook Plan area and should be applied alongside Cranbrook Plan Policies”.

8 This has necessitated the Local Plan having to spell out in each draft Local Plan policy the application or otherwise of the Local Plans’ policies to Cranbrook. Even then a range of policy relationships have had to be identified. The following policy wordings are suggested in the various wordings of the Draft Local Plan policies:

- a) “This policy applies across the whole local plan area including the Cranbrook Plan Area” (most commonly used);
- b) “This policy does not apply in the Cranbrook Plan area” – relatively rarely used outside site specific Local Plan policies;
- c) “This policy applies across the whole local plan area including the Cranbrook Plan area noting that the Cranbrook Plan also sets out Cranbrook bespoke requirements” (Policy SP07)
- d) “This policy applies across the whole of the local plan area including the Cranbrook Plan Area, except areas that fall within the Built up areas boundaries defined in the Cranbrook Plan” (e.g. Policy HN02 in relation to affordable housing)

e) “This policy applies across the whole of the local plan area but in the Cranbrook Plan Area noting that there may be viability impacts at Cranbrook that will need to be taken into account at planning application stage” (used only once – as the tailpiece to Policy HN03 in relation to Housing the Needs of older people)

f) “This policy applies across the whole Plan Area including the Cranbrook Plan area but does not supercede any Cranbrook Plan policies” (DS01 – Design and Local Distinctiveness]

g) “The first part of TR04 (Residential car parking standards) applies to the Local Plan area excluding Cranbrook; the second part (Employment and other development parking standards) applies to the whole Local Plan area including Cranbrook” (Policy TR04).

9 The Sustainability Appraisal, February 2025, prepared to support the draft Local Plan to 2042 appears to address Cranbrook only in terms of one element of context for the Local Plan policy development (e.g. the ability of a location to demonstrate access to Cranbrook station).

10 Moreover, sites within or adjoining the Cranbrook Plan area “are not being considered for allocation” in the Local Plan. They are “outside the scope of the East Devon Local Plan 2020-2042 as it is addressed in The Cranbrook Plan (adopted October 2022)”.

11 The Sustainability Appraisal therefore gives no consideration of the alternative policy options in the draft Local Plan: applying, not applying, partially applying, only applying subject to viability

- as a general approach. Nor to any specific policy treatments insofar as they seek to address, or not address, Cranbrook issues. 12The Viability report prepared by Three Dragons and published in January 2025 is completely unequivocal in confirming that it has had no regard to the effect of any policies in the draft Local Plan on Cranbrook:

a) “This report does not reconsider viability in Cranbrook as that has already been subject to a detailed review through its own area specific Cranbrook Development Plan Document...” (Executive Summary para 2)

b) “This report does not reconsider viability in respect of Cranbrook as that has already been subject to a detailed review through its own area specific Cranbrook Development Plan Document” (1.4)

Policy Objections

13 Within this context Hallam and Taylor Wimpey is concerned that the Local Plan may be intended, or read, to place additional policy expectations on development at Cranbrook even though it looks to make no additional allocations at Cranbrook and a comprehensive policy framework is in place (i.e. the Cranbrook Plan). This may be a hypothetical concern in that this is not the policy intent. Or hypothetical as remaining consents for the Bluehayes allocation in the Cranbrook Plan, and for the realisation of the remaining capacity in the Town Centre, will have been secured through the issue of outline planning permissions well in advance of the adoption of the East Devon Local Plan, yet there is some potential for the application of additional expectations at reserved matters stage.

14 Testing this concern, Hallam and Taylor Wimpey perceive that in a number of areas potential additional policy expectations are being placed on development at Cranbrook by the Local Plan over and above that set out in The Cranbrook Plan. By way of example such additional requirements potentially include:

- New expectations and or contributions of development in the Cranbrook Plan area in relation to Clyst Valley Regional Park (WS09);
- Carbon reduction and movement towards net zero development (CC01)
- Specific elements of the requirement for net zero carbon development (CC02)
- Requirement to address and minimise embodied energy usage (CC06)
- Expectations in relation to the delivery of specialist housing within both the C2 and C3 use classed
- Additional stipulations in relation to accessible and adaptable housing (HN04)
- Additional stipulations relating to ecological enhancements (PB07)
- Applica

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** To address the potential issues of soundness Hallam and Taylor Wimpey suggest that:

- the introductory section of the Local Plan (para 1.4) is updated to provide unambiguous guidance to the effect that where there is a policy in the Cranbrook Plan then this will not be superceded by any new policy set out in the Local Plan;
- any new Local Plan policy should not place any additional financial or cost burden on development in the Cranbrook Plan area – such cost effects not having been assessed through the Local Plan and to avoid the Cranbrook Plan being undermined;
- the need to apply new policy to the Cranbrook area through the Local Plan is carefully reviewed and avoided wherever possible (including for instance in relation to an alternative or additional approach to net zero carbon and embodied carbon).

In the light of the above the tailpiece elements of each Local Plan policy relating to the relationship of the Local Plan Policy and The Cranbrook Plan may need to be reviewed on a case by case basis.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** Hallam and Taylor Wimpey have been intrinsically involved in the development of Cranbrook and remain so, and were fully involved in process leading to the adoption of the Cranbrook Plan.

To the extent that there are concerns regarding the interaction of Local Plan and Cranbrook Plan policy set out above, and the possible consequences on Cranbrook's continued development then Hallam and Taylor Wimpey are uniquely placed to inform the examination.

**Full name:** Richard John Eley

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.4

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** With respect, I am doubtful that the Plan can have an Introduction which uses such mangled English, has errors of punctuation, and sentences such as the final passage of Para 1.4, which is frankly incomprehensible. Footnote 2 seems to have disappeared.

My polite recommendation is that the entire Introduction should be rewritten from scratch, and then closely examined by a competent officer or councillor who can write the Introduction in clear and simple English. Basic punctuation errors should be corrected.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** The last sentence of Para 1.4 is so unclear that I am struggling to establish what you are trying to say! Otherwise see above. A complete rewrite is required.

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** I will be precise. The introduction is almost unreadable and is incorrectly punctuated. It needs to be completely rewritten by a competent person.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** See above.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** It is important to communicate clearly and succinctly, if compliance with the duty to cooperate is to be achieved.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** The Introduction is an important component of the overall Plan and should set the tone for what follows. So it must be concise and clear.

I see that the sentence below this box is not complete, and is therefore lacking clear meaning. It rather sums things up.

**Full name:** Anthony Bevan

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 1.4

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** Because it says its about a Cranford local plan NOT the subject which is supposed to be the introduction to the East Devon plan

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** Be about the stated subject

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** it is not the correct plan

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** be about the correct plan

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** because it is the wrong introduction

**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)

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

**Full name:** Philip Wragg

**Organisation (where relevant):** Sid Vale Association

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** -

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** -

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

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**3. Do you consider that this part of the Introduction chapter is sound?:** Yes

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

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**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** I am Trustee for Town Planning matters at the Sid Vale Association - the

amenity society for the Sid Valley with approaching 2,000 members. We would like to be involved in the Local Plan process.

**Full name:** RICHARD MALCOLM CRABTREE

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** -

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** -

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** -

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

**Full name:** Andrew Minter

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Figure 1

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** -

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** Yes

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** As has been pointed out in various meetings and correspondences over the years, 2/3 of East Devon is classified as ' National Landscape' and so outside the scope of development, including WHOLE TOWNS such as Budleigh Salterton and Sidmouth. As a result, almost the entire so-called 'requirement' for development of sites (a Central Government requirement that has NOT apparently been challenged by East Devon District Council) falls on the remaining 1/3 of the district, specifically Exmouth and along the Exe Estuary. This is leading to/ has led to the

destruction of ecologically and environmentally sensitive green areas and also has led to the loss of agricultural land upon which this country will increasingly have a need on which to depend. EDDC needs to ROBUSTLY challenge the housing targets imposed upon it by Central Government, and threaten to build on National Landscape/ AONB to push the issue.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** I want to push the need to challenge Central Government housing targets imposed on EDDC. Devon is one of the poorest funded counties, with increases in funding this year leaving Devon near the bottom of the 'hand-out' table, thanks to the previous sensible money management undertaken by DCC!

**Full name:** Rob Wallbank

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Figure 1

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** Figure 1 page16, shows a proposed plan for land use and therefore potential housing land for development. Notably, this delates all of Seaton and Colyford from East Devon National Landscape which is at odds with previous and historic land designation, including, but not solely, that designated as Green Wedges and previously designated “land of outstanding natural beauty,” agricultural land or green spaces, but renaming the land to circumvent disputes.

This plan is also not consistent with the local plan; “East Devon Local Plan 2020-2042 (Reg 19 Consultation) inset to Policies Map” as it removes much of Colyford, whereas figure 1 redefines the entire town of Seaton and the village of Colyford.

**Full name:** Sara Davies

**Organisation (where relevant):** Lympstone Water Quality Group

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Figure 2

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** There is no reference to the fundamental importance of our natural watercourses, and the widely recognised pressures on water quality due to climate change and development. This demonstrates that the Sustainability Appraisal is not robust (it does not adequately address these issues). There is also no evidence in the 'Evidence Library' that water quality issues have been considered. There is now a growing body of local evidence and national reports and guidance on these issues (e.g., the Planning Advice for Integrated Water Management report, and House of Commons Environmental Audit Committee Report on Water Quality in Rivers).

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** Include reference to the importance of our natural watercourses under 'Outstanding natural environment', and reference to the increasing pressures on water quality under 'Climate change' in Figure 2. Consider why the Sustainability Appraisal did not flag up these issues that are so critical to sustainable development in East Devon. Please note that these pressures are not just related to the sewage system but also to pollution from roads, agriculture, construction, residential properties and other infrastructure (all exacerbated by climate change).

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The introduction sets the scene for the whole Local Plan. The fact that Figure 2 on key facts completely misses the importance of watercourses and water quality/pollution indicates that the whole Local Plan is not sound. As stated in 2(b), the Sustainability Appraisal does not adequately address water quality issues, and there is no reference to relevant local evidence and national reports and guidance in the 'Evidence Library'.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** As stated in 2 (c).

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** The fact that the importance of the natural watercourses, and the growing pressures on water quality due to climate change and development, are not highlighted in the Introduction chapter indicates that there has been inadequate cooperation and consultation on these issues which relate to both environmental protection and infrastructure planning.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** To highlight the findings of our catchment-based water quality project in Lympstone on the Exe Estuary and our consultations with national specialists and other community groups. We believe the East Devon Local Plan is not sound. It has not considered a major body of evidence at national and local levels, and it does not follow national advice and guidance.

**Full name:** Sacha Pemberthy

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Figure 2

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The key facts have some critical omissions that are important context setters for the overall plan and further the averaging of incomes creates a misleading picture of the demographic to inform what type of housing is appropriate. This has continually led to large amounts of retirement housing built with no adjustments to infrastructure which is failing to meet the local population needs.

Specifically the introduction should include:

- the fact that the current sewage system is already well over capacity and any development would require significant investment in the system and should be predicated on such
- include a graph showing the distribution of income rather than average income and where the housing need is such that developers are focused on presenting plans that meet the actual need vs housing for wealthier pensioners
- include data on other critical local services namely GPs per head of population and school places so that again developers can consider this in their plans

I point you to the development of London Kings Cross where the development included a school and primary health care provision as directed by the local plan.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** I have included this in my comments above but for completeness in figure 2:

- include a chart showing the overcapacity of current sewage system and need for further capacity
- include a graph showing income distribution rather than average income
- include a chart to show type of housing need required
- include a chart to reflect capacity of key local services namely GP services and schools and transport links

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** No as it does not refer to the issue of overcapacity of the sewage system and it also fails to set out the issues around capacity of other vital services and therefore who needs to work with any housing providers to ensure the appropriate infrastructure is in place.

**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)

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

**Full name:** Dan Trundle

**Organisation (where relevant):** Black Box Planning Ltd

**Other party name (if relevant):** of Greenhayes (Greendale Group / Crealy Farms)

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 2.1

The Greenhayes promotion site is defined by the site location plan at Appendix 1. As set out above, it is within the control of two landowners and there are no barriers to delivery, in contrast to the negative landowner assessment set out in the Sustainability Appraisal.

2.2

The majority of the Greenhayes land control was previously given HELAA reference GH/ED/64 and this mostly covers the land south of the A3052 Sidmouth Road between Crealy and Greendale Business Park, incorporating the current Farm Shop site.

2.3

The Greenhayes land control also incorporates: two fields adjacent to the Sidmouth Road between the Farm Shop site and the access to the Business Park (forming part of ref GH/ED/63); and a single field to the north of the Sidmouth Road (ref GH/ED/62).

2.4

Subsequently, the Greenhayes land control was consolidated into a single HELAA reference Farr\_03 shown overleaf below.

2.5

The majority of the land control at Greenhayes was incorporated into Option 2 shown below which was assessed in the CBRE October 2022 report East Devon: Options for a Potential New Settlement (ref GEV003).

2.6

In response to the Regulation 18 consultation, Greendale Group and Crealy Farms submitted representations in January 2023 which principally set out the shortcomings of the CBRE October 2022 report.

GREENDALE GROUP AND CREALY FARMS MARCH 2025 | PAGE 7

2.7

With reference to the published policies maps, including the inset maps produced, it is our understanding that Option 1 identified in the CBRE report has been identified by the Council as being an appropriate area of land for a Second New Community to be allocated under Policy WS01. The location of Option 1 is shown in yellow to the north of the Sidmouth Road on the inset policy map below. It is understood that an extension of the Clyst Valley Regional Park (CVRP) is proposed to expand to the south of the Second New Community under Policy WS09.

## 2.8

Furthermore, it is also understood that the Greenhayes land control is broadly inset between the proposed Second New Community (WS01) and extension of the CVRP (WS09) within so-called “white land”.

## 2.9

The proposed extension of the CVRP appears to broadly accord with the Greenhayes masterplan submitted to the Regulation 18 consultation. This masterplan is provided at Appendix 2. The overlay provided below demonstrates that most of the proposed built form is located within “white land”. However, some conflicts between the Greenhayes masterplan and the CVRP are apparent in the following areas:

- 

Ref 6 – the proposed employment area in the east of the masterplan

- 

Ref 8 – the proposed lower density residential area adjacent to parkland (southern part)

- 

Ref 9 - the proposed park and ride facility to the west of Crealy (western part)

- 

Ref 20 – the proposed medium density residential area in the east of the masterplan

## 2.10

The CVRP has been incorporated on the land controlled by Greenhayes without consultation and, as currently set out, they object to the proposed designation of the CVRP over these areas. Greenhayes are supportive of a plan-led system and are open to engagement, but at this stage, it does raise a relevant concern about the deliverability of parcels in the absence of any meaningful engagement.

**Full name:** -

**Organisation (where relevant):** Carden Group

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** 3.1

Carden Group recognises the importance of defining settlement boundaries to ensure that development is directed to appropriate locations in alignment with the Local Plan's objectives and spatial strategy. Clearly defined boundaries provide certainty for stakeholders and help manage sustainable growth in line with strategic policies.

3.2

However, the Interactive Policy Map, which serves as a key tool for interpreting the Local Plan, does not currently include crucial spatial designations from the adopted Cranbrook Plan. Most notably, it omits the Built-Up Area Boundaries for Cranbrook and its designated expansion areas including Treasbeare. These boundaries are fundamental for guiding development, ensuring policy clarity, and preventing inconsistent decision-making.

3.3

Given that Policies SP05 and SP06 explicitly reference the Cranbrook Plan—along with numerous other policies throughout the Local Plan—it is essential to integrate these designations into the Interactive Policy Map. Their omission risks creating confusion among developers, stakeholders, and decision-makers, which could lead to inconsistent policy application and unintended consequences for future development.

3.4

Furthermore, Carden believe that the clarity of policy maps is a fundamental requirement for the Local Plan to be found sound. Paragraph 16(d) of the NPPF explicitly states that plans should contain policies which are 'unambiguous, so it is evident how a decision-maker should react to development proposals.'

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** 3.5

To ensure clarity and consistency, we therefore strongly recommend that all Cranbrook Plan policy designations be made available as interactive layers on the Local Plan's Interactive Policy Map. These layers should most notably include, but not be limited to:

- The Built-Up Area Boundary for Cranbrook

- The designated expansion areas

- Gypsy and Traveller allocations

7

- Employment land allocations

- Sports Pitches

- The Cranbrook Plan area boundary

3.6

Incorporating these elements into the Interactive Policy Map will enhance usability and ensure that all relevant policy layers are easily accessible, facilitating informed decision-making.

**Full name:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning

Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection policies need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** The simplest solution is to remove the

proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: -**

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: -**

**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)

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

**Full name:** John Thorne BA DipTP MRTPI(Rtd)

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** An arbitrary, illogical and unjustified change has been effected in the southern settlement boundary of Lympstone in the interim between the Reg.18 and the Reg.19 versions of the proposals map. This has the effect of removing a site to the south of Underhill close from the settlement and affecting the Policy relevance of SP05 and SP06 despite the site having planning permission for redevelopment granted on appeal twice. The site is designated Lymp\_16 on the Reg.18 map.

It lies to the west of Housing allocation site Lymp\_01 between that site and the railway embankment. In the previous Reg.18 Local Plan Consultation map it was shown as Lymp\_16 and shaded in blue (referred to in the key as 'Planning Permission Granted') and within the settlement boundary of Lympstone. Over 50% of the land is hard surfaced tarmac which was laid out as a car park during local works by a statutory undertaker.

On the regulation 19. Consultation inset to the Policies map, without any prior consultation, justification or explanation, a new and illogical rectangular inset has been drawn around the site, excluding it from the settlement boundary. On this plan it has been colour coded green as part of the 'Green Wedge' between Lympstone and Exmouth but is otherwise unmarked. The previous colour coding acknowledging it as land with 'planning permission granted' does not appear.

The circumstances of the site are that it benefits from planning permission for redevelopment (Granted on appeal on two occasions) and has been acknowledged by successive Planning Inspectors as capable of development with a negligible impact on the Green Wedge and Landscape Quality, to be in a sustainable location, and to read as infill which would relate very well to surrounding housing.

In the decision on the first appeal (1st March 2022) APP/U1105/W/21/3282445 The Inspector wrote: "The development would read as infill and would relate very well to surrounding housing, falling inside a notional building line across this southern extent of the village." " .. the scheme

performs well against the sustainability objectives set out within the Framework." "...the site would be suitable for the proposal, having regard to the development plan's approach to the location of housing."

In the second decision (27th November 2024) APP/U1105/W/24/3341698 " The scale and position of the dwelling within the site follows the established building line on the edge of the settlement."

As it meets the relevant criteria the site has also been submitted for inclusion on the Council's register of brownfield land.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** Restore the settlement boundary to include site Lymp\_16 so that future development will lie within the logical and previously consulted boundary which has been acknowledged in two recent appeal decisions.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** The Local authority must be held to account and provide a justification and explanation for the decision making process with regard to the settlement boundary change.

**Full name:** Paul Nother

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection polices need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

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**Full name:** Paul Nother

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**3. Do you consider that this part of the Introduction chapter is sound?:** No

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The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

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**Full name:** Elizabeth Campbell

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**Full name:** John Connolly

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**Full name:** Ben Naughton

**Organisation (where relevant):** Roach Planning and Environment Limited

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** We hereby submit representations to the East Devon Local Plan 2020-2042 Regulation 19 Consultation. Our representation relates specifically to the proposed Ottery St Mary settlement boundary, as drawn on the proposed Policies Map. As drawn, the settlement boundary rightly includes two proposed site allocations GH/ED/27, Land

South of Strawberry Lane, and Otry\_10, Land at Salston Barton. However, it is noted that the settlement boundary excludes existing adjacent development at Salston Ride and the Otterhayes residential centre. We act on behalf of Sense, the charity that owns and operates Otterhayes. An extract from the current draft Policies Map is provided at Figure 1 overleaf.

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

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The Settlement Boundaries Topic Paper (Key Supporting Document 010) elaborates on the planned exclusion of these areas from the draft settlement boundary. The topic paper notes that the existing areas of built development adjacent to the allocations were

included within the Stage 1 settlement boundary, as well as the settlement boundary which was consulted on as part of the 2022 draft Local Plan. More recently the settlement boundary was redrawn to exclude these areas. Please refer to Figure 2 below, which comprises an extract of the

map provided in the topic paper.

The topic paper explains that the current settlement boundary has been drawn to exclude the areas of existing built development because there are no footways / footpaths connecting them

to the rest of the settlement. The paper states that: “There are footways to most of the built-up areas to the west of the river, but there are none along the rural lanes that lead to Salston Barton, Salston Ride and Salston Manor. These areas are included in the ‘stage 1’ boundary because a proposed allocation (Otry\_10) will ‘join’ them to the urban fabric of the town. However, the site assessment for Otry\_10 states that a footpath and cycle link will need to be provided along Strawberry Lane. Until this is achieved it would be premature to include the additional land in the settlement boundary.”

It is significant that the Stage 2 Assessment above appears to consider the draft allocation Otry\_10 in isolation and does not consider the adjacent draft allocation GH/ED/27. The latter site is currently the subject of an outline planning application, reference 24/1716/MOUT, which proposes significant enhancements to pedestrian infrastructure required in order to make that development acceptable in planning terms. That pedestrian infrastructure is essential in order for either or both of the proposed site allocations, Otry\_10 and GH/ED/27, to be delivered.

Figure 3 overleaf is an extract of the current site plan submitted with planning application 24/1716/MOUT (drawing ref. 2247-PL-105A). Figure 4 is an extract of Figure PL03 of the Transport Assessment submitted with that application and illustrates the proposed footways and pedestrian crossing on Strawberry Lane.

The site plan at Figure 3 illustrates that the existing Public Right of Way (PRoW) connecting to Salston Ride to the south would be resurfaced as part of the development. The PRoW would connect to the new footpaths / footways within the site south of Strawberry Lane, which in turn would connect to the proposed infrastructure illustrated at Figure 4. The new pedestrian infrastructure would connect the development to the rest of Ottery St Mary. As a result, the existing built development to the south at Salston Ride and the Otterhayes residential centre would be provided with pedestrian connectivity to the settlement.

Accordingly, we consider that it would be logical and proactive to extend the settlement boundary around this existing development, which is due to benefit from the pedestrian infrastructure improvements proposed as part of the development on Land South of Strawberry Lane.

We hope that the Council will agree that the proposed amendment to the Ottery St Mary settlement boundary is suitable for inclusion in the East Devon Local Plan 2020-2042. Our suggested amendment is presented at Figure 5, incorporating the Otterhayes and Salston Ride areas which would benefit from the new pedestrian connectivity.

We look forward to understanding your view on this matter as part of the Regulation 19 process.

**Full name:** Tom Scott

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**Full name:** Jennie Scott

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning

Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection policies need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Policies 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: -**

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**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)

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

**Full name:** Vanessa Morgan

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

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**3. Do you consider that this part of the Introduction chapter is sound?:** No

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Exmouth Settlement Boundary at the area designated Bystock Village in the Exmouth Neighbourhood Plan has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and Exmouth Neighbourhood Plan (ENP) contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The made Exmouth Neighbourhood Plan is very clear that Bystock Village is "the last place the community wants to see development" (made ENP Plan). This protective position has been explicitly supported under the current LP&ENP policies and by the Planning Inspectorate in determining recent planning refusals. Creating ambiguity and specific conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.
2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.
3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection polices need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

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**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: -**

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

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**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)

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

**Full name:** Llywelyn Morgan

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

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**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

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

**Full name:** Llywelyn Morgan

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary at Bystock Village. The Evidence flaws are:

1. There are no community facilities, either extant or with permission, within the proposed new settlement boundary and so the area does not comply with settlement boundary criteria B2 as asserted in the Evidence. The boundary criteria have been incorrectly applied and the Evidence is incorrect and hence the Plan is unsound.

2. There are no allocations near the new settlement boundary, as stated in the Evidence. The basis for extending the settlement boundary as shown in the Plan is thus false and the Plan unsound.

3. The assertion that, other than allocations, the Old Bystock Estate is largely excluded from the settlement boundary is wholly misleading and untrue. The Evidence was presented to the Strategic Planning Committee who have thus been misled in the basis for decision making and the Plan is therefore unsound.

4. The new settlement boundary creates a direct and specific conflict with the made Neighbourhood Plan. The new settlement boundary enables no new strategic numbers of houses, it is not required by any Local Plan Policy and it is not required by the NPPF. It is however explicitly contrary to the heritage protection policies in the made Neighbourhood Plan. The Neighbourhood Plan is not out of date and there is no evidence that its heritage protection polices need to change. Creating explicit and unnecessary policy conflict between a new Local Plan and made Neighbourhood Plan is contrary to NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.

5. The only outcome of the proposed settlement boundary change is to change a smooth and soft settlement boundary into a crude, irregular penetration into the countryside. The enabling of infill housing will eviscerate the heritage protections in the made Neighbourhood Plan and result in the obliteration of the unique “sense of place” that currently exists in Bystock Village. It will also irrevocably destroy the original spatial and architectural integrity that currently surrounds the Grade 2 listed Bystock Court.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Polices 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been specifically validated by previous Planning Inspectorate decisions.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: -**

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.: -**

**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)

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

**Full name:** John Connolly

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

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**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** -

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The Exmouth Settlement Boundary (ESB) at the area designated Bystock Village in the Exmouth Neighbourhood Plan (ENP) has been changed.

This change is only shown in the Local Plan Policies Map and mentioned in the Settlement Boundaries Evidence Paper. It is not explicitly described in any of the Local Plan Chapters published online for Regulation 19 consultation but it fundamentally changes the basis for development on the north eastern edge of Exmouth.

The proposed change is based on an unsound application of the Settlement Boundary Criteria B2, false statements about alignment with local allocations and creates specific and avoidable policy conflict between Local Plan (LP) and ENP contrary to NPPF guidance. The proposal is thus unsound.

The effect of this settlement boundary shift is to change the Local Plan presumption in favour of development. The ENP is very clear that this heritage asset is not one in which they want to allow development. This protective position has been explicitly supported under the current LP&ENP policies by the Planning Inspectorate. Creating ambiguity and conflict between Local Plan and Neighbourhood Plan policies is pointless if there is no compelling reason to do so.

Paragraph 13.4 of the Settlement Boundary Evidence deals specifically with changes to the Exmouth Settlement Boundary (ESB) at Bystock Village. This Evidence:

1. Is based on an incorrect and inconsistent application of the agreed Settlement Boundary criteria B2 (Settlement Boundary Topic Paper) making the Plan unsound.

2. Makes false statements about the congruent relationship of the new ESB with nearby Allocations making the Plan unsound. The change actually creates an irregular and discordant settlement boundary that penetrates the surrounding countryside.
3. Makes factually misleading statements about what is excluded from the ESB at Bystock Village making the Plan unsound.
4. Fails to follow NPPF guidance on the relationship between Local and made Neighbourhood Plans making the Plan unsound.
5. Introduces a wholly avoidable and unnecessary Policy conflict between LP and ENP making the Plan unsound.
6. The proposed change adds no value to the new LP and fails to present a coherent rationale as to why the change should override explicit Heritage protection policies within the made Neighbourhood Plan.

The attached paper outlines the complete detail of each of these objections.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** The simplest solution is to remove the proposed settlement boundary change, returning the Exmouth Settlement Boundary at Bystock Village to its existing position (Local Plan 2013-2031). This modification would require no other changes to any element of the proposed Local Plan.

The outcome would be wholly consistent with the LP settlement boundary criteria and new LP Spatial Strategy; it would follow NPPF requirements; would be aligned with draft Strategic Polices 05 and 06; would be consistent with draft Heritage policies in the LP; would leave ENP heritage protection policies undiminished and leaves a wholly clear planning policy position that has already been validated by previous Planning Inspectorate decisions.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** No

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** The proposed settlement boundary change near Bystock Village creates a specific policy conflict between Local Plan and Neighbourhood Plan for no good reason. There has been no meaningful discussion of the relative benefits versus negative outcomes between Local Plan Authority and Exmouth Town Council.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** The Evidence presented clearly demonstrates that the LPA has not correctly applied due process. It also has not meaningfully engaged in consideration of the impact of the boundary change, the resulting explicit policy clash and the relative priorities of new LP and existing ENP.

It is clear that the LPA cannot be relied on to represent the specific issues at Bystock Village in a balanced manner.

**Full name:** Nigel Humphrey

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

**1. To which part of the Introduction chapter does your representation relate?:** Figure/Image

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** Policies Map

**2. Do you consider that this part of the Introduction chapter is legally compliant?:** -

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**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The site maps for Exmo\_20 are conflicting with NPPF chapter 3 'Plan Making' where it states that plans should be 'up to date'. The EDDC have been contacted on numerous times to update the map for Exmo\_20 to stop promoting the site with land that is not available (i.e. existing homes, listed buildings and the grade II \* church and its lands). This was confirmed and the settlement boundaries identified. However, page 326 of the Sustainability Report' shows the Tier One - Principal Centre Settlement Exmouth' map with the 2022 map outline for Exmo\_20, as is the map on page 102 of the Site Allocations 'SAL' document for Exmouth (SAL-022). The 2022 maps should not be used in the up to date documentation, it only causes confusion.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** Ensure that all February 2025 documentation and maps are up to date and reflect the outline for Exmo\_20 as per the 'East Devon Local Plan 2020-2042 (Reg 19 Consultation) Inset to Policies map highlighted in blue on this map as is the map on page 103 of the Site Allocations (SAL) for Exmouth. Remove the map on page 102 of the Site Allocations (SAL) for Exmouth. Please note these are the only ones I have found there may be other discrepancies.

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?: -**

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

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**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: -**

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

**Full name:** Wilfrid David Hudson

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction

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**2. Do you consider that this part of the Introduction chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** -

**2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.:** The BUAB for Newton Poppleford is incorrectly shown. It seems to have reverted to an earlier version of the BUAB which included much of the west end of the village. This was replaced by a new BUAB which excluded this area of the village and it is that version which should be used before this plan is sent to the planning inspectorate.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**3. Do you consider that this part of the Introduction chapter is sound?:** -

**3(a). If yes, and you wish to support the soundness of this part of the Introduction chapter, please use this box to set out your comments.:** -

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** -

**3(c). Please set out the modification(s) you consider necessary to make this part of the Introduction chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter 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.:** -

**4. Do you consider that this part of the Introduction chapter complies with the duty to cooperate?:** -

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

**4(b). If no, please give details of why you consider this part of the Introduction chapter fails to comply with the duty to co-operate. Please be as precise as possible.:** -

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**: Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.**: I want to be sure that the BUAB for Newton Poppleford has been changed back to that originally agreed

**Full name:** Dan Trundle

**Organisation (where relevant):** Black Box Planning Ltd

**Other party name (if relevant):** of Greenhayes (Greendale Group / Crealy Farms)

**Proposal:** 1. Introduction

**Full name:** Dan Trundle

**Organisation (where relevant):** Black Box Planning Ltd

**Other party name (if relevant):** of Greenhayes (Greendale Group / Crealy Farms)

**Proposal:** 1. Introduction

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** CR Down Farming Ltd and Stuart Partners Ltd

**Proposal:** 1. Introduction

**3. Do you consider that this part of the Introduction chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Introduction chapter is not sound. Please be as precise as possible.:** The following section contains specific policy comments and follows the order of the draft plan.

Our client fully endorses good design and the need to assess and mitigate the impacts of development.

However, any proposed local policies must be justified, any potential impact on viability and deliverability must be assessed, policies should not seek to unnecessarily replicate the NPPF or Building Regs (or other regulatory regimes) and finally should not be drafted in such a way that they hinder development. Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations.

Viability

The Three Dragons Viability Assessment does not appear to have taken account of the pending Building Safety Levy due to come into effect from Autumn 2026. The rate per sqm in East Devon is currently indicated to be £34.06/sqm so would be £3406 for each 100sqm open market dwelling.

This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**Proposal:** 1. Introduction

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**Proposal:** 1. Introduction

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:** Yes, I wish to participate in hearing session(s)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** In order to elaborate on these representations and earlier representations

**Full name: -**

**Organisation (where relevant): -**

**Other party name (if relevant): -**

**Proposal: 1. Introduction**

**2. Do you consider that this part of the Introduction chapter is legally compliant?: Yes**

**3. Do you consider that this part of the Introduction chapter is sound?: Yes**

**Full name:** Eleanor Clarke

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**Proposal:** 1. Introduction