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East Devon Local Plan
Publication Stage (Regulation 19)
Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates: East Devon Local Plan 2020-2042

Please return to East Devon District Council, Local Plans Team, Blackdown House, Border Road, Honiton, EX14 1EJ, upload onto our consultation portal at <https://eastdevonlocalplanreg19.commonplace.is/> or email to localplan@eastdevon.gov.uk by **31 March 2025**

This form has two parts:

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

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

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Full name	<input type="text" value="Ben Naughton"/>
Are you acting as an agent for another party?	<input type="text" value="Yes"/>
Organisation (where relevant)	<input type="text" value="Roach Planning and Environment Limited"/>
Address line 1	<input type="text"/>
Address line 2	<input type="text"/>
Address line 3	<input type="text"/>
Postcode	<input type="text"/>
Email address	<input type="text"/>

Part B – Representation

Please use a separate sheet for each representation

2. To which part of the East Devon Local Plan does this representation relate? Please write down the paragraph or policy number that your representation relates to.

Paragraph

Policy

Policies Map

3. Do you consider that this part of the East Devon Local Plan is legally compliant?

Yes

No

3 (a). If yes, and you wish to support the legal compliance of this part of the East Devon Local Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

Please refer to attached letter.

3 (b) If no, please give details of why you consider this part of the East Devon Local Plan is not legally compliant. Please be as precise as possible.
(Continue on a separate sheet if necessary)

Please refer to attached letter.

3 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the East Devon Local Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

Please refer to attached letter.

4. Do you consider that this part of the East Devon Local Plan is Sound?

Yes

No

4 (a). If yes, and you wish to support the soundness of this part of the East Devon Local Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

Please refer to attached letter.

4 (b). If no, please give details of why you consider this part of the East Devon Local Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please refer to attached letter.

4 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the East Devon Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please refer to attached letter.

5. Do you consider that this part of the East Devon Local Plan complies with the Duty to Co-operate?

Yes

No

5 (a). If yes, and you wish to support this part of the East Devon Local Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

Please refer to attached letter.

5 (b). If no, please give details of why you consider this part of the East Devon Local Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please refer to attached letter.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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

(Continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read the privacy notices at the following links: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>, <https://www.commonplace.is/privacy-policy>

8. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.



East Devon District Council
Local Plans Team
Blackdown House
Border Road
Honiton
Devon
EX14 1EJ

Your Ref:
Our Ref: 0296/04/250318

18 March 2025

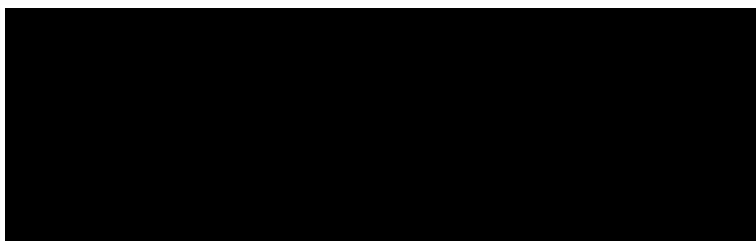
Dear Sir/Madam,

East Devon Local Plan 2020-2042: Regulation 19 Consultation
Proposed Settlement Boundary Amendment

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.

We consider that the Ottery St Mary settlement boundary should be redrawn to include the aforementioned existing development, for the reasons detailed below.



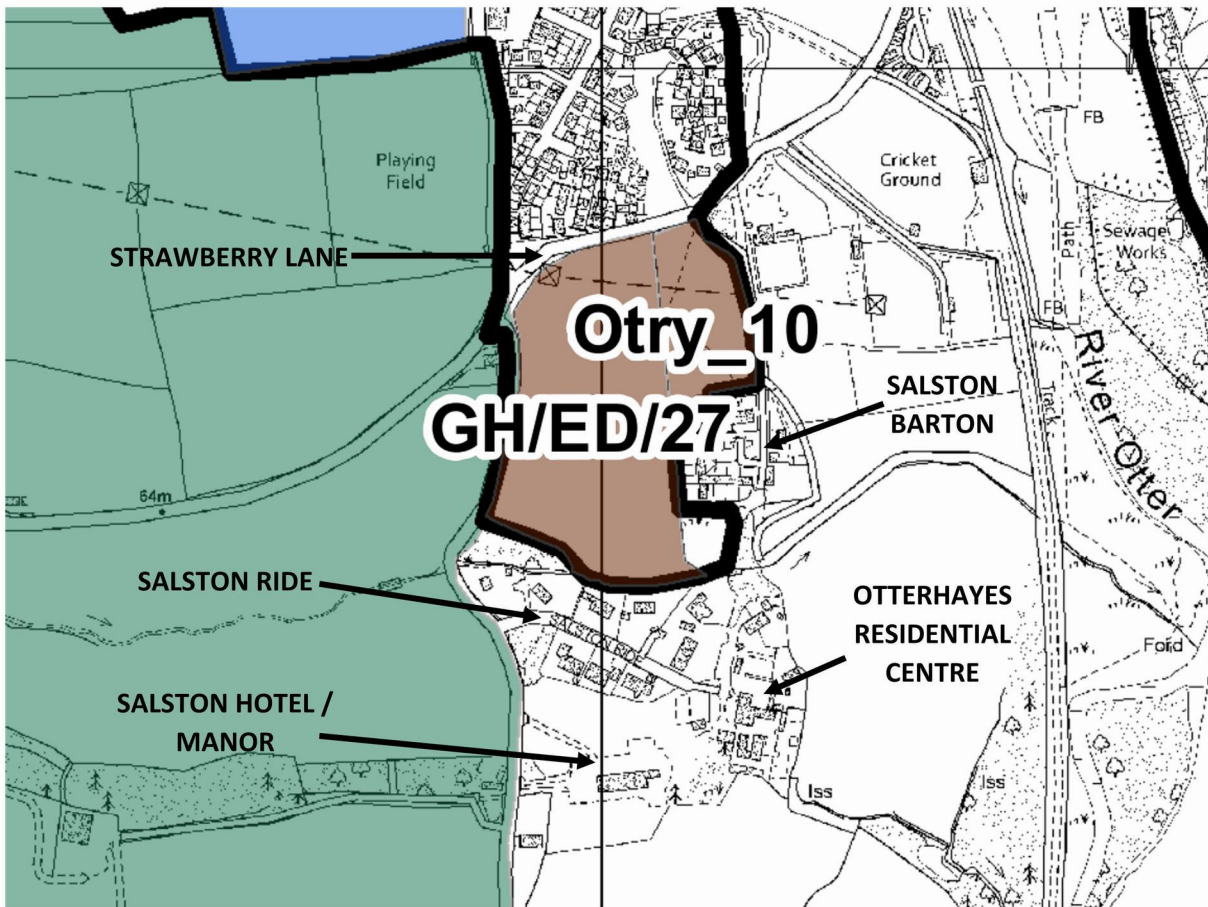
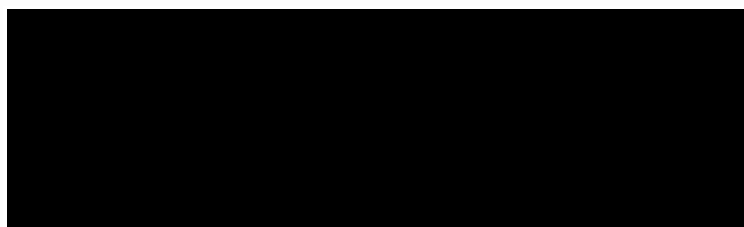


FIGURE 1: EXTRACT FROM THE EAST DEVON LOCAL PLAN 2020-2042 (REG 19 CONSULTATION) POLICIES MAP (OTTERY ST MARY INSET MAP)

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.



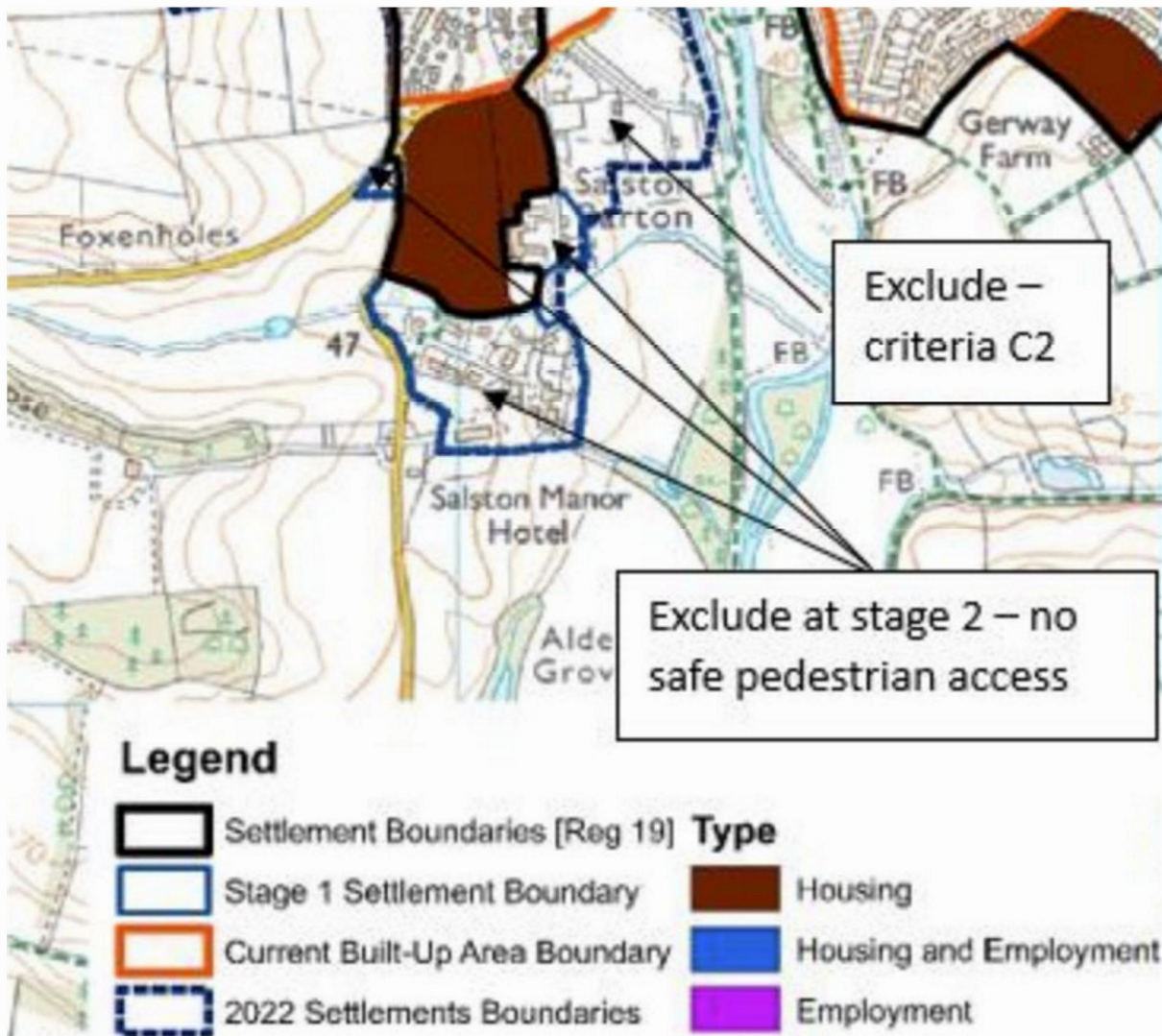
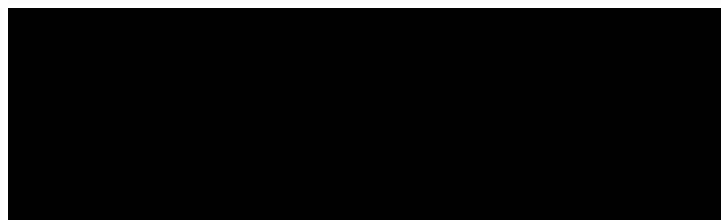


FIGURE 2: EXTRACT FROM KSD-010 SETTLEMENT BOUNDARIES TOPIC PAPER – MAP OF OTTERY ST MARY SETTLEMENT BOUNDARIES

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 (Ottry_10) will ‘join’ them to the urban fabric of the town. However, the site assessment for Ottry_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.

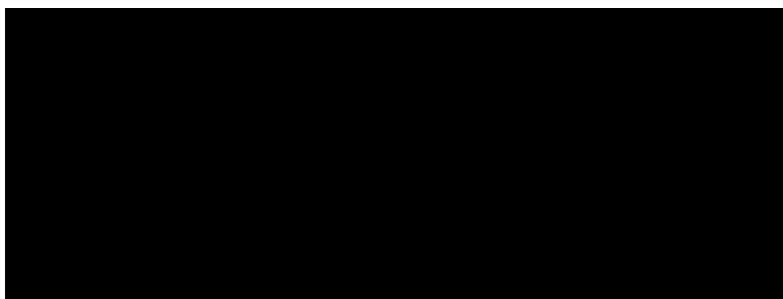




FIGURE 3: EXTRACT FROM SITE PLAN SUBMITTED WITH OUTLINE PLANNING APPLICATION 24/1716/MOUT © ELLIS HEALEY ARCHITECTURE

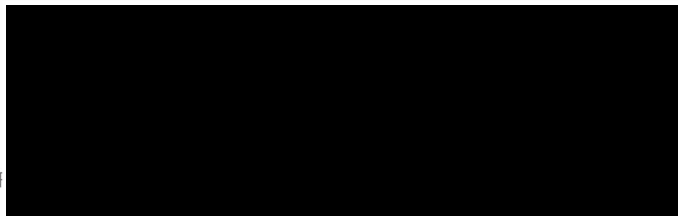
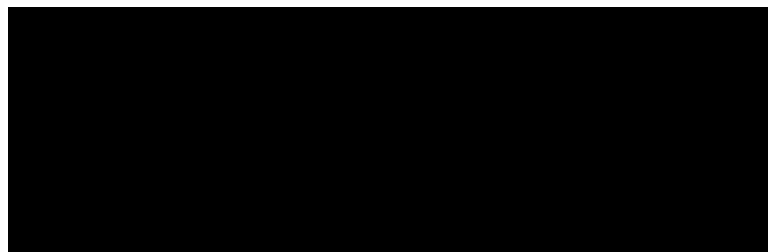




FIGURE 4: EXTRACT FROM FIGURE PL03 OF TRANSPORT ASSESSMENT SUBMITTED WITH OUTLINE PLANNING APPLICATION 24/1716/MOUT @ LVW HIGHWAYS

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.



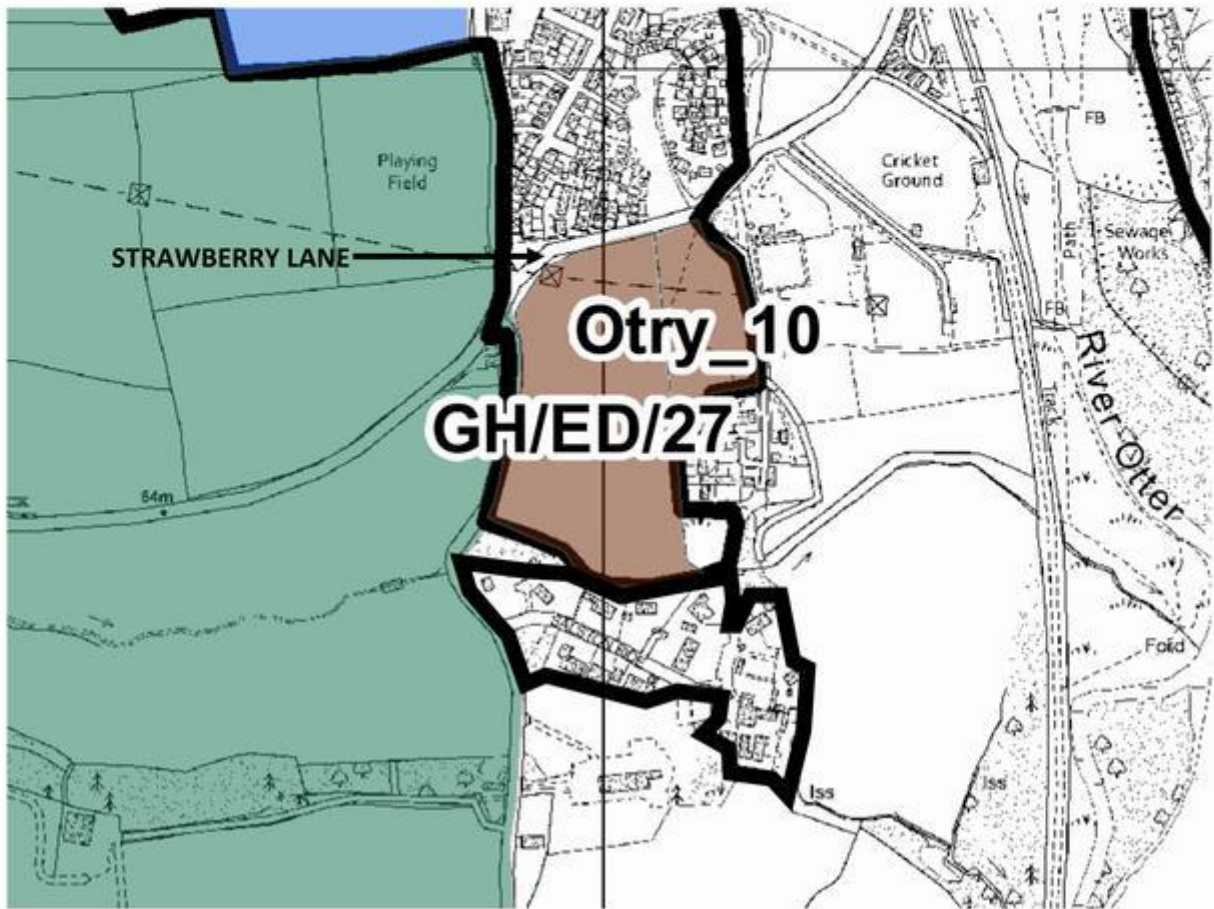
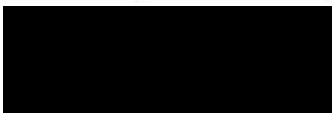


FIGURE 5: SUGGESTED REVISED SETTLEMENT BOUNDARY

We look forward to understanding your view on this matter as part of the Regulation 19 process.

Yours faithfully,



Ben Naughton MSc
Assistant Planning Consultant

