

## Filtered Data Export

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**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

**1(b). Does your comment relate to one of the changes listed above?:** 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.:** We maintain our overriding view that in order to meet the significant housing challenges faced in East Devon a step change in approach is required to provide greater balance towards identifying sufficient sites to meet identified needs. In order to do this there is a need to be more proportionate and pragmatic towards designations and policy requirements. Otherwise, the Plan will fail to demonstrate that it is based on an effective strategy underpinned by clear evidence, does not seek to appropriately meet identified needs and will limit the opportunity to deliver sustainable development.

We have focussed our responses on the revisions included within the Part 2 Regulation 19 version of the Plan as requested, but maintain all of our concerns previously raised against the Plan.

For ease of reference the following representation forms are submitted as our response to this Part 2 consultation [see separate entries]:

- Policies SP01 & SP02 (Spatial Strategy and Future Housing Level)
- Policy WS01 (Development of Marlcombe)
- Policy SD03 (Honiton and its Development Allocations)

It is important to emphasise that these representations must be considered alongside our previous representations to the earlier stages of the Emerging Local Plan and the original Regulation 19 consultation version.

In a number of cases no further significant changes have been made to the Plan and its policies to either remove our previous objections or require us to add further to our previous comments. Therefore, the concerns raised at Regulation 18 and the original Regulation 19 consultation in respect of those matters remain despite not making further representations on them at this current stage. For completeness, the Council and Inspector should therefore also refer to our previous representations made on the following policy matters:

- Policy SP01 (Spatial Strategy)
- Policy SP02 (Levels of Future Housing Development)
- Policy WS01 (Development of a second new community)
- Policy SD03 (Honiton and its Development Allocations)
- Policy CC01 (Climate Emergency)
- Policy CC02 (Net-zero Development)
- Policy CC05 (Heat Networks)
- Policy CC06 (Embodied Carbon)
- Policy AR01 (Flooding)
- Policy HN02 (Affordable Housing)
- Policy HN03 (Housing to meet the needs of Older People)
- Policy HN05 (Self Build)
- Policy DS02 (Housing Density and Efficient use of Land)
- Policy OL04 (Areas of Strategic Visual Importance)
- Policy PB05 (Biodiversity Net Gain)
- Policy PB09 (Monitoring Requirements for New Planting Schemes)

**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.:** Given the current and previous representations made on the Emerging Local Plan on behalf of our clients, we have confirmed that we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

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See entries for representations submitted at first Regulation 19 consultation on:

- Policy SP01 (Spatial Strategy)
- Policy SP02 (Levels of Future Housing Development)
- Policy WS01 (Development of a second new community)
- Policy WS09 (Clyst Valley Regional Park)
- Policy WS10 (Development next to M5 and north of Topsham)
- Policy SD01 (Exmouth and its Development Allocations)
- Policy CC01 (Climate Emergency)
- Policy CC02 (Net-zero Development)

- Policy CC05 (Heat Networks)
- Policy CC06 (Embodied Carbon)
- Policy AR01 (Flooding)
- Policy AR02 (Water Efficiency)
- Policy HN02 (Affordable Housing)
- Policy HN03 (Housing to meet the needs of Older People)
- Policy HN05 (Self Build)
- Policy DS02 (Housing Density and Efficient use of Land)
- Policy OL03 (Coastal Preservation Areas)
- Policy OL04 (Areas of Strategic Visual Importance)
- Policy PB05 (Biodiversity Net Gain)
- Policy PB09 (Monitoring Requirements for New Planting Schemes)

We have focussed our responses on the revisions included within the Part 2 Regulation 19 version of the Plan as requested, but maintain all of our concerns previously raised against the Plan. For ease of reference the following representation forms are submitted as our response to this Part 2 consultation:

- Policies SP01 & SP02 (Spatial Strategy and Future Housing Level)
- Policy WS01 (Development of Marlcombe)
- Policy WS10 (Development next to M5 and north of Topsham)
- Policy SD01 (Exmouth and its Development Allocations)
- Policy AR02 (Water Quality and Efficiency)
- Policy OL03 (Coastal Preservation Areas)

It is important to emphasise that these representations must be considered alongside our previous representations to the earlier stages of the Emerging Local Plan and the original Regulation 19 consultation version. In a number of cases no further significant changes have been made to the Plan and its policies to either remove our previous

objections or require us to add further to our previous comments. Therefore, the concerns raised at Regulation 18 and the original Regulation 19 consultation in respect of those matters remain despite not making further representations on them at this current stage.

**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.:** Given the current and previous representations made on the Emerging Local Plan on behalf of our clients, we have confirmed that we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:** 12. Our Outstanding Landscape

**1. To which part of the Our Outstanding Landscape chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OL03

**1(b). Does your comment relate to one of the changes listed above?:** Yes

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

**3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:** We are disappointed to note that the extent of the proposed CPA remains unchanged and the Council continue to provide no justification for their position regarding its extent. This is despite previous representations (at the Further Regulation 18 stage and initial Regulation 19 stage) on behalf of our clients questioning the evidence base for defining the extended areas of the CPA included in the Plan. This also included a comprehensive review undertaken by Pegasus in relation to the extended CPA Area 5 – Topsham to Exmouth.

The review highlighted significant flaws with the Council's approach, highlighting an over reliance on the CPA designation, placing it higher in the hierarchy of designations than National Landscapes, despite being a local designation.

The appraisal within the Pegasus review sets out that there is no evidential basis on landscape and visual grounds to support the proposed extension of the CPA between Topsham and Exmouth.

Critically the CPA extension is not supported by fieldwork evidence to test visual connectivity and instead relies on desktop assessment which do not fully represent actual views. In contrast the Pegasus review includes ZTV mapping and field work that give a more accurate appraisal of views. The review concludes that further inland between Exmouth and Lympstone views of the sea are typically fully restricted by

roadside planting and built development. It confirms that whilst there are extensive views of the estuary in the immediate vicinity of the shoreline, further inland views are reduced to occasional glimpses as a result of mature hedgerows and hedgebanks. Similarly the field work confirms views of the land within the CPA from the sea is very limited and confined to the fields between coastal settlements, west of the A367 and within 300m of the estuary. It is frustrating that the evidence base for the Plan does not include any acknowledgement or response to the review that we have provided. We remain concerned that the Council continues to take a blanket approach to CPA as a designation and has failed to appropriately justify its extent and purpose within the Plan.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape 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 Our Outstanding Landscape 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.:** For Strategic Policy OL03 relating to the CPA the extent of the designation needs further evidence and justification or the policy needs to be modified to provide the opportunity for alternative evidence to be provided and taken into account in windfall situations.

**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, including providing evidence to support the necessary Modification of the Plan.

**Full name:** Stuart Houlet

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**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**  
Marlcombe

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**  
[This representation is also relevant to paragraphs 4.5 to 4.7f inclusive]

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

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

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

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

It is therefore highly likely that over reliance on delivery at Marlcombe will place additional pressures on the effectiveness of the Plan in the second half of the Plan period if, as expected, the suggested level of housing coming forward on the site is significantly behind the trajectory. Over assumptions of delivery across a narrower range of complex sites can only result in under supply and a Plan that fails to meet need.

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

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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.:** It is important that the housing delivery rate assumed from Marlcombe within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision

from Marlcombe and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

**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, including providing evidence to support the necessary Modification of the Plan.

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**1(b). Does your comment relate to one of the changes listed in the table above?:** No

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

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** [this representation is also relevant to Spatial Policy chapter paragraphs 3.1 to 3.14 inclusive]

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 Part 2 version of the Plan with no substantive changes being made to the overall Plan strategy and how levels of future housing delivery will be managed.

Policy SP01 – Spatial Strategy: We continue to broadly support the spatial strategy outlined in Policy SP01 which continues to recognise the role of Honiton as a Main Centre where significant development can be accommodated, although we do consider that the level of actual provision is too low and is not sufficient to address the historic lack of delivery of new homes at Honiton.

There are further site opportunities that continue to be overlooked as raised further in representations in relation to Policy SD03 (Honiton and its Development Allocations) which could contribute to addressing these needs. My clients' site at Heathfield Manor, Honiton is one such site, providing a logical extension to the town and forming a

significantly improved landscape and habitat relationship between the urban edge and National Landscape.

We also remain concerned regarding the continued reliance on the new community in respect of this Plan period. The experience of Cranbrook demonstrates the long lead-in times in respect of delivery, with first occupations at Cranbrook occurring some 20 years post allocation (having been arguably a more defined proposal than the new Marlcombe community at that stage). We provide additional comments on this in relation to Strategic Policy WS01. None of the changes within the Part 2 version address the risks to delivery. Indeed, increased aspirations for affordable housing and higher densities at Marlcombe increase the likelihood of delivery rates not being achieved.

We also consider it to be short-sighted not to consider further provision at Cranbrook beyond the adopted Cranbrook Plan area, given it clearly would be a sustainable option for delivering additional growth and infrastructure is already in place or planned. This alongside other deliverable sites would provide the opportunity for contingency and bring much needed resilience to the Plan.

Policy SP02 – Levels of Future Housing Development: We are greatly concerned that the Council has not sought either to revisit the stepped approach to housing delivery or provide any further justification for its approach within the Part 2 Reg 19 consultation. We have set out in our previous reps that this is unjustified, will simply defer housing delivery and will widen the gap between supply and unmet need. This is in the context of the Plan already seeking to under provide on its strategic housing requirement by utilising the NPPF transitional arrangements to reduce this by 20%. This is despite the clear intention of the transitional arrangements being to provide the opportunity for advancing Local Plans quickly after the publication of the revised NPPF and issue a Regulation 19 Plan by March 2025. Nearly a year on from this the Council remains unsettled on its Regulation 19 Plan (as evidenced by this Part 2 consultation) with fundamental questions remaining regarding its soundness and around the delivery of key sites.

The stepped housing delivery approach proposed within SP02 will instead defer the issue of under delivery to the later parts of the Plan at which point unmet needs will be substantial with little prospect of addressing any shortfall. Therefore, rendering the Plan ineffective and failing to deliver sustainable development in order to meet the needs of its community consistent with national policy.

The stepped approach will have the effect that for more than half of the Plan period housing delivery will be proposed at 71% of the new standard method, a reduction of more than a quarter of the local housing needs target. Resulting in substantial unmet need and, critically, a substantial shortfall with no certainty that the Plan will address this in the later Plan period.

That the Part 2 Regulation 19 Plan does not address this issue or justify its approach does nothing to suggest that the proposed stepped approach is not simply a contrived way of firstly attempting to benefit from the transitional arrangements and secondly, avoiding making the important and difficult decisions required to meet the District's substantial level of housing need.

We set out in our previous representations that the circumstances where a stepped approach might be appropriate are not relevant in East Devon, this is because:

- Required housing numbers are not significantly different to those within the previous Local Plan (indeed they are the same under the transitional arrangements);
- Many of the allocated sites within the Plan are not 'strategic' in the sense of the PPG;
- The uncertainties around the delivery of Marlcombe at the latter part of the Plan period suggests the Plan should look to maximise delivery of non strategic sites in the earlier stages of the Plan period;
- The nationwide Lichfield report relied upon by the Council identifies that smaller sites (under 100 dwellings) which make up a significant proportion of the Plan's allocation are capable of being delivered in 4 years; and
- Environmental constraints and planning challenges are not unique to East Devon.

The Council's attention is drawn to the Inspector's Detailed Stage 2 Post Hearing Letter following the Examination of the Wiltshire Local Plan in December 2025 which heavily criticises the stepped housing approach for the reasons outlined above. The Inspector further questioned why the stepped housing approach was not tested as part of the Sustainability Appraisal of the Plan (see Wiltshire Local Plan Examination). These same criticisms that such an approach is neither positively prepared nor justified are equally relevant to the East Devon Plan.

Rather than justify a stepped approach, we consider the above factors should lean towards a Plan that seeks to frontload and maximise delivery from a range of sites rather than metaphorically 'kicking the can down the road' by delaying delivery and then over relying on the latter part of the Plan period.

Some of the concerns the Council now raise in respect of early delivery are a direct consequence of the decisions made which saw some larger sites allocated on capacity grounds without due regard to constraints such as securing appropriate access, ecology impacts, heritage impacts and land ownership and the unjustified removal of other sites which could have contributed to housing delivery in the earlier stages of the Plan. We outline these concerns in representations to Policy SD03 in respect of our clients' site at land at Heathfield Manor, Honiton which was not carried forward from the Regulation 18 Plan, contrary to officers recommendations.

There were a wide range of opportunities for further allocated sites as evidenced by the Regulation 18 version of the plan and site selection processes, which identified a number of suitable and available sites that would not have high infrastructure burdens and could come forward quickly. It is regrettable that the inconsistencies of the Regulation 19 site selection process have meant that some sites considered suitable at Regulation 18 (and more deliverable in many cases) were removed at Regulation 19, whilst other sites, with more challenging constraints, not previously considered were allocated in their place.

The Council had in front of them a range of sites in key settlements identified as available and suitable which have not been taken forward, but if they were, they could still provide significant resilience to the Plan strategy by supporting early and increased delivery rates, negating a flawed stepped housing approach.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Spatial Strategy 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 we have set out above the Plan's approach in setting a stepped housing target is unjustified, goes against the spirit of the NPPF transitional arrangements and seeks to effectively push the matter of delivering housing to meet local needs into the next local plan cycle. The Government have been clear that in introducing the transitional arrangements they expect the progress of plans to be

maintained, whilst maximising proactive planning for the homes communities need. We consider the stepped approach does not support the Government's intentions.

Therefore, currently this approach risks rendering the Plan unsound in our view. To address this the Plan will need to be the subject of fundamental modification. This will include removing all reference to the stepped approach within Policy SP02 and instead including a consistent housing requirement of 950.4 dwellings per annum over the entire Plan period.

In addition, to provide greater resilience against the delivery issues the Council has identified in relation to larger sites, modifications should be made to include a range of sites that can support greater resilience for early Plan delivery. This includes reviewing and allocating opportunities already previously considered through the site selection process where sites were previously proposed to be allocated in earlier stages of the Plan and/or where they have not been discounted on deliverability grounds.

These Modifications are essential for addressing the unjustified stepped approach towards housing delivery and ensuring the Plan can be found sound. Otherwise, the Plan as it stands would not be positively prepared in that it fails to deliver the housing required to meet local needs. Its approach is not justified by the evidence base nor is it consistent with national policy. The result will be an ineffective Plan that fails to deliver for the needs of its community.

**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, including providing evidence to support the necessary Modification of the Plan.

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

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP02

**1(b). Does your comment relate to one of the changes listed in the table above?:** No

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

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** [this representation is also relevant to Spatial Policy chapter paragraphs 3.1 to 3.14 inclusive]

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 Part 2 version of the Plan with no substantive changes being made to the overall Plan strategy and how levels of future housing delivery will be managed.

Policy SP01 – Spatial Strategy: We continue to broadly support the spatial strategy outlined in Policy SP01 which continues to recognise the role of Honiton as a Main Centre where significant development can be accommodated, although we do consider that the level of actual provision is too low and is not sufficient to address the historic lack of delivery of new homes at Honiton.

There are further site opportunities that continue to be overlooked as raised further in representations in relation to Policy SD03 (Honiton and its Development Allocations) which could contribute to addressing these needs. My clients' site at Heathfield Manor, Honiton is one such site, providing a logical extension to the town and forming a

significantly improved landscape and habitat relationship between the urban edge and National Landscape.

We also remain concerned regarding the continued reliance on the new community in respect of this Plan period. The experience of Cranbrook demonstrates the long lead-in times in respect of delivery, with first occupations at Cranbrook occurring some 20 years post allocation (having been arguably a more defined proposal than the new Marlcombe community at that stage). We provide additional comments on this in relation to Strategic Policy WS01. None of the changes within the Part 2 version address the risks to delivery. Indeed, increased aspirations for affordable housing and higher densities at Marlcombe increase the likelihood of delivery rates not being achieved.

We also consider it to be short-sighted not to consider further provision at Cranbrook beyond the adopted Cranbrook Plan area, given it clearly would be a sustainable option for delivering additional growth and infrastructure is already in place or planned. This alongside other deliverable sites would provide the opportunity for contingency and bring much needed resilience to the Plan.

Policy SP02 – Levels of Future Housing Development: We are greatly concerned that the Council has not sought either to revisit the stepped approach to housing delivery or provide any further justification for its approach within the Part 2 Reg 19 consultation. We have set out in our previous reps that this is unjustified, will simply defer housing delivery and will widen the gap between supply and unmet need. This is in the context of the Plan already seeking to under provide on its strategic housing requirement by utilising the NPPF transitional arrangements to reduce this by 20%. This is despite the clear intention of the transitional arrangements being to provide the opportunity for advancing Local Plans quickly after the publication of the revised NPPF and issue a Regulation 19 Plan by March 2025. Nearly a year on from this the Council remains unsettled on its Regulation 19 Plan (as evidenced by this Part 2 consultation) with fundamental questions remaining regarding its soundness and around the delivery of key sites.

The stepped housing delivery approach proposed within SP02 will instead defer the issue of under delivery to the later parts of the Plan at which point unmet needs will be substantial with little prospect of addressing any shortfall. Therefore, rendering the Plan ineffective and failing to deliver sustainable development in order to meet the needs of its community consistent with national policy.

The stepped approach will have the effect that for more than half of the Plan period housing delivery will be proposed at 71% of the new standard method, a reduction of more than a quarter of the local housing needs target. Resulting in substantial unmet need and, critically, a substantial shortfall with no certainty that the Plan will address this in the later Plan period.

That the Part 2 Regulation 19 Plan does not address this issue or justify its approach does nothing to suggest that the proposed stepped approach is not simply a contrived way of firstly attempting to benefit from the transitional arrangements and secondly, avoiding making the important and difficult decisions required to meet the District's substantial level of housing need.

We set out in our previous representations that the circumstances where a stepped approach might be appropriate are not relevant in East Devon, this is because:

- Required housing numbers are not significantly different to those within the previous Local Plan (indeed they are the same under the transitional arrangements);
- Many of the allocated sites within the Plan are not 'strategic' in the sense of the PPG;
- The uncertainties around the delivery of Marlcombe at the latter part of the Plan period suggests the Plan should look to maximise delivery of non strategic sites in the earlier stages of the Plan period;
- The nationwide Lichfield report relied upon by the Council identifies that smaller sites (under 100 dwellings) which make up a significant proportion of the Plan's allocation are capable of being delivered in 4 years; and
- Environmental constraints and planning challenges are not unique to East Devon.

The Council's attention is drawn to the Inspector's Detailed Stage 2 Post Hearing Letter following the Examination of the Wiltshire Local Plan in December 2025 which heavily criticises the stepped housing approach for the reasons outlined above. The Inspector further questioned why the stepped housing approach was not tested as part of the Sustainability Appraisal of the Plan (see Wiltshire Local Plan Examination). These same criticisms that such an approach is neither positively prepared nor justified are equally relevant to the East Devon Plan.

Rather than justify a stepped approach, we consider the above factors should lean towards a Plan that seeks to frontload and maximise delivery from a range of sites rather than metaphorically 'kicking the can down the road' by delaying delivery and then over relying on the latter part of the Plan period.

Some of the concerns the Council now raise in respect of early delivery are a direct consequence of the decisions made which saw some larger sites allocated on capacity grounds without due regard to constraints such as securing appropriate access, ecology impacts, heritage impacts and land ownership and the unjustified removal of other sites which could have contributed to housing delivery in the earlier stages of the Plan. We outline these concerns in representations to Policy SD03 in respect of our clients' site at land at Heathfield Manor, Honiton which was not carried forward from the Regulation 18 Plan, contrary to officers recommendations.

There were a wide range of opportunities for further allocated sites as evidenced by the Regulation 18 version of the plan and site selection processes, which identified a number of suitable and available sites that would not have high infrastructure burdens and could come forward quickly. It is regrettable that the inconsistencies of the Regulation 19 site selection process have meant that some sites considered suitable at Regulation 18 (and more deliverable in many cases) were removed at Regulation 19, whilst other sites, with more challenging constraints, not previously considered were allocated in their place.

The Council had in front of them a range of sites in key settlements identified as available and suitable which have not been taken forward, but if they were, they could still provide significant resilience to the Plan strategy by supporting early and increased delivery rates, negating a flawed stepped housing approach.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Spatial Strategy 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 we have set out above the Plan's approach in setting a stepped housing target is unjustified, goes against the spirit of the NPPF transitional arrangements and seeks to effectively push the matter of delivering housing to meet local needs into the next local plan cycle. The Government have been clear that in introducing the transitional arrangements they expect the progress of plans to be

maintained, whilst maximising proactive planning for the homes communities need. We consider the stepped approach does not support the Government's intentions.

Therefore, currently this approach risks rendering the Plan unsound in our view. To address this the Plan will need to be the subject of fundamental modification. This will include removing all reference to the stepped approach within Policy SP02 and instead including a consistent housing requirement of 950.4 dwellings per annum over the entire Plan period.

In addition, to provide greater resilience against the delivery issues the Council has identified in relation to larger sites, modifications should be made to include a range of sites that can support greater resilience for early Plan delivery. This includes reviewing and allocating opportunities already previously considered through the site selection process where sites were previously proposed to be allocated in earlier stages of the Plan and/or where they have not been discounted on deliverability grounds.

These Modifications are essential for addressing the unjustified stepped approach towards housing delivery and ensuring the Plan can be found sound. Otherwise, the Plan as it stands would not be positively prepared in that it fails to deliver the housing required to meet local needs. Its approach is not justified by the evidence base nor is it consistent with national policy. The result will be an ineffective Plan that fails to deliver for the needs of its community.

**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, including providing evidence to support the necessary Modification of the Plan.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP02

**1(b). Does your comment relate to one of the changes listed in the table above?:** No

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

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** [Representation also applies to Spatial Strategy chapter paragraphs 3.1 to 3.14 inclusive. See also representation for Policy SP01]

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** 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 Part 2 version of the Plan with no substantive changes being made to the overall Plan strategy and how levels of future housing delivery will be managed.

Policy SP02 – Levels of Future Housing Development: We are greatly concerned that the Council has not sought either to revisit the stepped approach to housing delivery or provided any further justification for its approach within the Part 2 Reg 19 consultation. We have set in our previous reps that this is unjustified, will simply defer housing delivery and widen the gap between supply and unmet need. This is in the context of the Plan already seeking to under provide on its strategic housing requirement by utilising the NPPF transitional arrangements to reduce this by 20%. This is despite the clear intention of the transitional arrangements being to provide the opportunity for advancing Local Plans quickly after the publication of the revised NPPF and issue a Regulation 19 Plan by March 2025. Nearly a year on from this the Council remains

unsettled on its Regulation 19 Plan (as evidenced by this Part 2 consultation) with fundamental questions remaining regarding its soundness and around the delivery of key sites.

The stepped housing delivery approach proposed within SP02 will instead defer the issue of under delivery to the later parts of the Plan at which point unmet needs will be substantial with little prospect of addressing any shortfall. Therefore, rendering the Plan ineffective and failing to deliver sustainable development in order to meet the needs of its community consistent with national policy.

The stepped approach will have the effect that for more than half of the Plan period housing delivery will be proposed at 71% of the new standard method, a reduction of more than a quarter of the local housing needs target. Resulting in substantial unmet need and, critically, a substantial shortfall with no certainty that the Plan will address this in the later Plan period.

That the Part 2 Reg 19 Plan does not address this issue or justify its approach does nothing to suggest that the proposed stepped approach is not simply a contrived way of firstly attempting to benefit from the transitional arrangements and secondly, avoiding making the important and difficult decisions required to meet the District's substantial level of housing need.

We set out in our previous representations that the circumstances where a stepped approach might be appropriate are not relevant in East Devon, this is because:

- Required housing numbers are not significantly different to those within the previous Local Plan (indeed they are the same under the transitional arrangements);
- Many of the allocated sites within the Plan are not 'strategic' in the sense of the PPG;
- The uncertainties around the delivery of Marlcombe at the latter part of the Plan period suggests the Plan should look to maximise delivery of non strategic sites in the earlier stages of the Plan period;
- The nationwide Lichfield report relied upon by the Council identify that smaller sites (under 100 dwellings) which make up a significant proportion of the Plan's allocation are capable of being delivered in 4 years; and
- Environmental constraints and planning challenges are not unique to East Devon.

Rather than justify a stepped approach, we consider the above factors should lean towards a Plan that seeks to frontload and maximise delivery from a range of sites rather than metaphorically ‘kicking the can down the road’ by delaying delivery and then over relying on the latter part of the Plan period.

There are a wide range of opportunities for further allocated sites as evidenced by the Regulation 18 version of the plan and site selection processes, which identified a number of suitable and available sites that would not have high infrastructure burdens and could come forward quickly. It is regrettable that the inconsistencies of the Regulation 19 site selection process have meant that some sites considered suitable at Regulation 18 (and more deliverable in many cases) were removed at Regulation 19, whilst other sites, with more challenging constraints, not previously considered were allocated in their place.

The Council had in front of them a range of sites in key settlements identified as available and suitable which have not been taken forward, but if they were, they could still provide significant resilience to the Plan strategy by supporting early and increased delivery rates, negating the stepped housing approach.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Spatial Strategy 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 we have set out above the Plan’s approach in setting a stepped housing target is unjustified, goes against the spirit of the NPPF transitional arrangements and seeks to effectively push the matter of delivering housing to meet local needs into the next local plan cycle. The Government have been clear that in introducing the transitional arrangements they expect the progress of plans to be maintained, whilst maximising proactive planning for the homes communities need. We consider the stepped approach does not support the Government’s intentions.

Therefore, currently this approach risks rendering the Plan unsound in our view. To address this the Plan will need to be the subject of fundamental modification. This will include removing all reference to the stepped approach within Policy SP02 and instead including a consistent housing requirement of 950.4 dwellings per annum over the entire Plan period. In addition, to provide greater resilience against the delivery issues

the Council has identified in relation to larger sites, modifications should be made to include a range of sites that can support greater resilience for early Plan delivery. This includes reviewing and allocating opportunities already previously considered through the site selection process where sites were previously proposed to be allocated in earlier stages of the Plan and/or where they have not been discounted on deliverability grounds.

These Modifications are essential for addressing the unjustified stepped approach towards housing delivery and ensuring the Plan can be found sound. Otherwise, the Plan as it stands would not be positively prepared in that it fails to deliver the housing required to meet local needs. Its approach is not justified by the evidence base nor is it consistent with national policy. The result will be an ineffective Plan that fails to deliver for the needs of its community.

**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.:** Given the current and previous representations made on the Emerging Local Plan on behalf of our clients, we have confirmed that we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

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

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:** [Representation also applies to Spatial Strategy chapter paragraphs 3.1 to 3.14 inclusive] 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 Part 2 version of the Plan with no substantive changes being made to the overall Plan strategy and how levels of future housing delivery will be managed.

Policy SP01 – Spatial Strategy: We continue to broadly support the spatial strategy outlined in Policy SP01 which recognises the role of the West End of the District in supporting the role of Exeter through strategic growth. We also support that the Plan recognises the role of Exmouth as a Principal Centre with the capacity for high levels of growth, although we do consider that the level of actual provision is too low and is not sufficient to address the historic lack of delivery of new homes at Exmouth in the town. There are further site opportunities that continue to be overlooked as raised further below [see separate entry] in representations in relation to Policy SD01 (Exmouth and its Development Allocations) which could contribute to addressing these needs.

We also remain concerned regarding the continued reliance on the new community in respect of this Plan period. The experience of Cranbrook demonstrates the long lead-in times in respect of delivery, with first occupations at Cranbrook occurring some 20 years post allocation (having been arguably a more defined proposal than the new

Marlcombe community at that stage). We provide additional comments on this in relation to Strategic Policy WS01. None of the changes within the Part 2 version address the risks to delivery. Indeed increased aspirations for affordable housing and higher densities at Marlcombe increase the likelihood of delivery rates not being achieved.

We also consider it to be short-sighted not to consider further provision at Cranbrook beyond the adopted Cranbrook Plan area, given it clearly would be a sustainable option for delivering additional growth and infrastructure is already in place or planned. This alongside other deliverable sites would provide the opportunity for contingency and bring much needed resilience to the Plan.

Policy SP02 – Levels of Future Housing Development: We are greatly concerned that the Council has not sought either to revisit the stepped approach to housing delivery or provided any further justification for its approach within the Part 2 Reg 19 consultation. We have set in our previous reps that this is unjustified, will simply defer housing delivery and widen the gap between supply and unmet need. This is in the context of the Plan already seeking to under provide on its strategic housing requirement by utilising the NPPF transitional arrangements to reduce this by 20%. This is despite the clear intention of the transitional arrangements being to provide the opportunity for advancing Local Plans quickly after the publication of the revised NPPF and issue a Regulation 19 Plan by March 2025. Nearly a year on from this the Council remains unsettled on its Regulation 19 Plan (as evidenced by this Part 2 consultation) with fundamental questions remaining regarding its soundness and around the delivery of key sites.

The stepped housing delivery approach proposed within SP02 will instead defer the issue of under delivery to the later parts of the Plan at which point unmet needs will be substantial with little prospect of addressing any shortfall. Therefore, rendering the Plan ineffective and failing to deliver sustainable development in order to meet the needs of its community consistent with national policy.

The stepped approach will have the effect that for more than half of the Plan period housing delivery will be proposed at 71% of the new standard method, a reduction of more than a quarter of the local housing needs target. Resulting in substantial unmet need and, critically, a substantial shortfall with no certainty that the Plan will address this in the later Plan period.

That the Part 2 Reg 19 Plan does not address this issue or justify its approach does nothing to suggest that the proposed stepped approach is not simply a contrived way of firstly attempting to benefit from the transitional arrangements and secondly, avoiding making the important and difficult decisions required to meet the District's substantial level of housing need.

We set out in our previous representations that the circumstances where a stepped approach might be appropriate are not relevant in East Devon, this is because:

- Required housing numbers are not significantly different to those within the previous Local Plan (indeed they are the same under the transitional arrangements);
- Many of the allocated sites within the Plan are not 'strategic' in the sense of the PPG;
- The uncertainties around the delivery of Marcombe at the latter part of the Plan period suggests the Plan should look to maximise delivery of non strategic sites in the earlier stages of the Plan period;
- The nationwide Lichfield report relied upon by the Council identify that smaller sites (under 100 dwellings) which make up a significant proportion of the Plan's allocation are capable of being delivered in 4 years; and
- Environmental constraints and planning challenges are not unique to East Devon.

Rather than justify a stepped approach, we consider the above factors should lean towards a Plan that seeks to frontload and maximise delivery from a range of sites rather than metaphorically 'kicking the can down the road' by delaying delivery and then over relying on the latter part of the Plan period.

There are a wide range of opportunities for further allocated sites as evidenced by the Regulation 18 version of the plan and site selection processes, which identified a number of suitable and available sites that would not have high infrastructure burdens and could come forward quickly. It is regrettable that the inconsistencies of the Regulation 19 site selection process have meant that some sites considered suitable at Regulation 18 (and more deliverable in many cases) were removed at Regulation 19, whilst other sites, with more challenging constraints, not previously considered were allocated in their place.

The Council had in front of them a range of sites in key settlements identified as available and suitable which have not been taken forward, but if they were, they could

still provide significant resilience to the Plan strategy by supporting early and increased delivery rates, negating the stepped housing approach.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Spatial Strategy 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 we have set out above the Plan's approach in setting a stepped housing target is unjustified, goes against the spirit of the NPPF transitional arrangements and seeks to effectively push the matter of delivering housing to meet local needs into the next local plan cycle. The Government have been clear that in introducing the transitional arrangements they expect the progress of plans to be maintained, whilst maximising proactive planning for the homes communities need. We consider the stepped approach does not support the Government's intentions.

Therefore, currently this approach risks rendering the Plan unsound in our view. To address this the Plan will need to be the subject of fundamental modification. This will include removing all reference to the stepped approach within Policy SP02 and instead including a consistent housing requirement of 950.4 dwellings per annum over the entire Plan period.

In addition, to provide greater resilience against the delivery issues the Council has identified in relation to larger sites, modifications should be made to include a range of sites that can support greater resilience for early Plan delivery. This includes reviewing and allocating opportunities already previously considered through the site selection process where sites were previously proposed to be allocated in earlier stages of the Plan and/or where they have not been discounted on deliverability grounds.

These Modifications are essential for addressing the unjustified stepped approach towards housing delivery and ensuring the Plan can be found sound. Otherwise, the Plan as it stands would not be positively prepared in that it fails to deliver the housing required to meet local needs. Its approach is not justified by the evidence base nor is it consistent with national policy. The result will be an ineffective Plan that fails to deliver for the needs of its community.

**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.:** Given the current and previous representations made on the Emerging Local Plan on behalf of our clients, we have confirmed that we do wish to attend the Examination Hearings relevant to all the points raised in order to provide greater elaboration of the detail of these representations.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:**  
Marlcombe

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages 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 Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**

[This representation is also related to Development at the West End chapter paragraphs 4.44 to 4.45]

Strategic Policy WS10: Development next to the M5 and north of Topsham: The allocation of the urban extension to the north of Topsham for mixed use development continues to be supported. From a sustainability perspective, we would agree that an urban extension to Exeter and Topsham, and the access to the wide range of services and facilities that the City provides, is one of the most sustainable options for the Local Plan in delivering strategic planned growth. It also does not carry the same extent of infrastructure burdens or the associated long delivery lead-in times of the new community at Marlcombe.

Whilst we agree masterplanning will be an important element in ensuring development can come forward in a comprehensive and planned way we do consider the proposed

wording of the policy remains too negative in respect of release of individual sites and support for a phased approach. Any masterplanning should be effective, proportionate and should not unnecessarily hold up delivery.

The site has already been the subject of framework master planning and visioning and being identified as a single strategic allocation will provide a further framework for decision-making in respect of key delivery and infrastructure matters. Furthermore, technical work to underpin an outline planning application (to be submitted within the next few months) demonstrates that there are no inherent technical constraints to development.

However, the policy is worded in a way that would appear to require all unknowns and uncertainties to have been fully addressed prior to any part of the site being considered, including relying on the Council and Exeter City Council to have collaborated over a Development and Infrastructure Delivery Framework. This all points to the potential for significant delay and the lack of delivery. It should also be noted that phases 1 and 2 of the Taylor Wimpey scheme at Clyst Road within the Exeter City administrative boundary are either complete or committed and therefore Exeter's interest and the need for collaboration would appear to be very limited.

It is important for overall Plan resilience, that whilst masterplanning will be required, development should be able to proceed in phases where it is demonstrated that it would not prejudice the delivery of the wider site (for example, by ensuring proper connections are made to land ownership boundaries and making appropriate contributions to infrastructure etc). It is often the planning application process that provides the certainty regarding the likely final form of development (including quantity, land uses, and S106 obligations) and therefore assists in establishing the apportionment of costs and infrastructure requirements through collaboration agreements between developers.

Therefore, any masterplanning and delivery framework will need to be undertaken in conjunction with the site promoters and be proportionate. It should aim to provide high level principles to aid a phased approach rather than rule out flexibility that is often key to the delivery of a strategic allocation. Each subsequent application would then need to demonstrate how it does not prejudice the delivery of the wider allocation. There are clear benefits to this approach in that it enables elements of the allocation to be delivered as early phases to support Plan resilience and early housing delivery. It will

begin to establish key principles and a direction of travel for the remainder of the allocation as well as building confidence in the Plan strategy.

We have focussed our response on Policy WS10 as revised under the Part 2 consultation. However it is important to emphasise that these representations must be considered alongside previous representations made on behalf of our clients to the earlier stages of the Emerging Local Plan and the original Regulation 19 consultation version.

For completeness, the Council and Inspector should also refer to our previous representations on the original Regulation 19 consultation version relating to the following policy matters:

- Policy SP01 (Spatial Strategy)
- Policy SP02 (Levels of Future Housing Development)
- Policy WS01 (Development of a second new community)
- Policy WS09 (Clyst Valley Regional Park)
- Policy WS10 (Development next to M5 and north of Topsham)
- Policy CC01 (Climate Emergency)
- Policy CC02 (Net-zero Development)
- Policy CC05 (Heat Networks)
- Policy CC06 (Embodied Carbon)
- Policy AR01 (Flooding)
- Policy AR02 (Water Efficiency)
- Policy HN02 (Affordable Housing)
- Policy HN03 (Housing to meet the needs of Older People)
- Policy HN05 (Self Build)
- Policy DS02 (Housing Density and Efficient use of Land)
- Policy OL04 (Areas of Strategic Visual Importance)
- Policy PB05 (Biodiversity Net Gain)
- Policy PB09 (Monitoring Requirements for New Planting Schemes)

We maintain our overriding view that in order to meet the significant housing challenges faced in East Devon a step change in approach is required to provide greater balance towards identifying sufficient sites to meet identified needs. In order to do this there is a need to be more proportionate and pragmatic towards designations and policy requirements. Otherwise, the Plan will fail to demonstrate that it is based on an effective strategy underpinned by clear evidence, does not seek to appropriately meet identified needs and will limit the opportunity to deliver sustainable development.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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 set out above we remain generally supportive of Policy WS10 but are concerned as currently written it does rule out a more phased and flexible approach and early delivery. The allocation wording should be modified to not rule out individual site release as a matter of principle. Instead wording requiring individual elements to demonstrate that they would not prejudice the delivery of the wider area would be more appropriate. Furthermore, we would suggest clarification is required in terms of ECC's role in a Development and Infrastructure Delivery Framework, given the limited influence this can now have on what are now committed sites under construction.

**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, including providing evidence to support the necessary Modification of the Plan.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS10

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here.:** Land North of Topsham

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**  
[This representation also relates to Development at the West End chapter paragraphs 4.44 to 4.45]

The allocation of the urban extension to the north of Topsham for mixed use development continues to be supported. From a sustainability perspective, we would agree that an urban extension to Exeter and Topsham, and the access to the wide range of services and facilities that the City provides, is one of the most sustainable options for the Local Plan in delivering strategic planned growth. It also does not carry the infrastructure burdens or the associated long delivery lead-in times of the new community at Marlcombe. Whilst we agree master planning will be an important element in ensuring development can come forward in a comprehensive and planned way we do consider the proposed wording of the policy remains too negative in respect of release of individual sites and support for a phased approach. Any masterplanning work should be developed in conjunction with landowners and site promoters to ensure it is effective and proportionate. It is also important that it does not unnecessarily hold up delivery.

Our client's site at Land at Clyst Road forms the southern most element of the allocation, although it also has a strong relationship with the adjoining consented sites to the west and forms the next logical phase of the development currently being built out. It represents a relatively small element of the land allocated at north Topsham and the delivery of that wider strategic allocation is not dependent on it. In these circumstances there is no reason why that site could not come forward as an early phase, provided it demonstrates it will not prejudice the delivery of the wider area (which should be the key test for any phase). A Framework masterplan has previously been provided to the Council that demonstrates that would not be the case.

There are clear benefits to this approach in that it enables elements of the allocation to be delivered as early phases to support Plan resilience and early housing delivery. It will begin to establish key principles and a direction of travel for the remainder of the allocation as well as building confidence in the Plan strategy.

Whilst it is noted that Exeter City Council are referenced as needing to be jointly involved in respect of a Development and infrastructure Delivery Framework, the need for this is questioned given the adjoining sites within the ECC area all have consent and are being delivered.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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 set out above we remain generally supportive of Policy WS10 but are concerned as currently written it does rule out a more phased and flexible approach and early delivery. The allocation wording should be modified to not rule out individual site release as a matter of principle. Instead wording requiring individual elements to demonstrate that they would not prejudice the delivery of the wider area would be more appropriate.

Furthermore, we would suggest clarification is required in terms of ECC's role in a Development and Infrastructure Delivery Framework, given the limited influence this can now have on what are now committed sites under construction.

**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, including providing evidence to support the necessary Modification of the Plan.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

4. Development at the West End

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** WS01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**  
Marlcombe

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

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

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

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

This renders the approach of the Plan as ineffective and unjustified. Whilst it is accepted that the evidence base and approach in respect of the delivery of Marlcombe

will develop over time given its clear long-term delivery beyond the Plan period, there is still a requirement for the Plan to sufficiently demonstrate with certainty that housing delivery assumptions within the Plan period can be realistically met. This is still noticeably absent from the Plan.

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

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

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

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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.:** It is important that the housing delivery rate assumed from Marlcombe within the Plan period is evidenced based in order that it is robust. Given the lead-in times involved and experience from other strategic sites, it seems clear that the levels suggested will not be met. The Plan should therefore be modified to include a more realistic and evidence based provision from Marlcombe and sufficient other sites should be included to address the shortfall and to provide resilience to the Plan strategy as a whole.

**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, including providing evidence to support the necessary Modification of the Plan.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD03

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**  
Honi\_01, Honi\_15

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:**  
[This representation also relates to Development in the Towns and Villages chapter paragraphs 5.5 to 5.6 inclusive]

We are disappointed that the Part 2 Regulation 19 Consultation continues to overlook additional opportunities for housing provision at Honiton (including sites previously identified at earlier stages of the Plan). There remains additional capacity at Honiton for further sites to come forward that can benefit from existing infrastructure and accessibility. This would provide greater resilience to the Plan as a whole, particularly in light of the uncertainties around Marcombe and other larger allocated sites. It would also support housing delivery earlier in the Plan period.

Land at Heathfield Manor (previously Honi\_01 and Honi\_15): [see attached sketch plan]  
We set out in previous representations made on the initial Regulation 19 Plan the inconsistencies, errors and failures of the site selection process that led to the Heathfield Manor site not being appropriately considered or assessed in respect of its suitability for supporting housing growth at Honiton. This meant that a site, previously identified partly as a draft allocation (Honi\_01) in the Plan and initially supported by officers as an extended site (Honi\_15) within the published recommended sites for the

Regulation 19 Plan (before the report was withdrawn and replaced just prior to the meeting), was left out of the Plan without any justification.

Please refer to our initial Regulation 19 representations for the timeline and further evidence to support our concerns regarding how the site has been treated and the inconsistencies of the site selection process overall. In summary, the key points are:

- The site (Honi\_01) was included in the Regulation 18 Plan as a draft allocation;
- The HELAA did not identify any inherent constraint, whilst acknowledging it's location within the National Landscape;
- The site was considered achievable and deliverable within the first 5 years of the Plan;
- Wider scheme (Honi\_15) promoted at further Regulation 18 stage with masterplan submitted;
- Supported by officers and recommended for inclusion at Regulation 19 Site Selection process and included in Site Selection Report to be reported to Strategic Planning Committee (SPC);
- This report was withdrawn after publication a few days before the SPC meeting and advised that it would be given further consideration;
- Information presented to the SPC meeting was inaccurate and Members did not appear to understand what they were considering (Honi\_01 or Honi\_15); and
- Members did not take forward Honi\_01 or Honi\_15 in the Regulation 19 Plan, despite Honi\_01 being previously a draft allocation.

The only reason given for the site's exclusion has been its location within the National Landscape. This ignores the fact that the site was previously identified as a draft allocation despite its location within the National Landscape and that other sites in Honiton are allocated within the extent of the National Landscape boundaries. Indeed other sites across the District have also been allocated, including Exmouth and Sidmouth, and also lower order settlements such as Newton Poppleford and Sidbury etc. We maintain our view that if this is not a principle reason to exclude sites in those lower tier places then it would be unreasonable to rule sites out at Honiton given the town's greater role for accommodating growth. The boundary of the National Landscape does not follow the settlement boundary and there are already significant parts of Honiton that falls within the boundary of the National Landscape designation.

Furthermore, it is noted that the Council has published a topic paper alongside the Part 2 Regulation 19 Plan consultation which considers major development in National Landscapes and seeks to justify the sites to be included within the Plan where these are within or adjacent to the National Landscape. Honi\_15 is referred to as a rejected site and dismissed as an alternative on the basis that there would be significant landscape impacts. This is contrary to the evidence previously provided in support of the site and the Council's previous position in respect of its part draft allocation and the initial support from officers.

The topic paper provides no further evidence of a comparative assessment between those sites included in the Plan within the National Landscape and our clients' site. The paper then further justifies the inclusion of the other sites on the basis that the purposes of the National Landscape to conserve and enhance its natural beauty could be advanced through careful design, landscape retention and reinforcement, materials and scale. All matters relevant to Honi\_015 and demonstrated through the submission of masterplanning work.

This identified clear opportunities for landscape and habitat enhancement through a wide network of green space and green corridors, public open space, extensive landscape features and blue infrastructure that would provide substantial benefit in enhancing the transition from the National Landscape and the urban form of Honiton. This would significantly improve the current relationship and landscape setting and is a clear benefit of the Heathfield Manor scheme.

No reference is made to this masterplanning work that has been submitted to the Council for Honi\_15, despite similar framework design work being used to justify inclusion for other sites in the National Landscape. This again flags the inconsistency of approach to site selection and the absence of clear and robust evidence that underpins it.

We have continued to progress the masterplan for the site alongside the technical evidence base. The latest masterplan is attached as Appendix 5 to the representation covering letter and continues to demonstrate the strong landscape led approach, providing significant green buffer zones to provide strong transition areas between the proposed development and the existing built form to the north and National Landscape to the south. It also shows how suitable access can be achieved from Sidmouth Road and Honeysuckle Drive supported by a clear street hierarchy and pedestrian and cycle

linkages connecting to existing development and the wider network. Drainage work has identified the opportunity for a range of SuDs features, including a network of swales and attenuation basins with outfall at greenfield rates to the central stream.

No heritage constraints have been identified, with the site providing overall a wider agricultural hinterland with very limited archaeological activity, with any remains being of low interest and nothing of greater than local significance. Whilst there are listed buildings within 1km from the site the site has no visual connection, spatial relationship or historic connection with any heritage asset and does not form any setting function.

Ecology surveys have been undertaken and an ecological constraints and opportunities report has informed the masterplanning work and the provision of significant habitat enhancement and creation on the site and the provision of a specific area for BNG. This has been supported by tree surveys and an arboricultural constraints and opportunities plan. The masterplan has responded by seeking to retain all trees and hedgerows wherever possible and to strengthen boundaries and enhance the key green corridor crossing the site.

The overall accessibility of the site is undisputed, being within walking distance of key facilities and well located to benefit from bus and rail services.

The technical work has therefore identified that the site is well placed to deliver housing in a sustainable location to support the role of Honiton and is a site that is unconstrained nor overburdened by infrastructure requirements. The site can therefore come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy.

Our position remains that the omission of the Heathfield Manor site from the Plan is a significant lost opportunity and there were and are no good reasons for it not to have been allocated. It provides a more logical southern extension of Honiton than other more constrained sites that have been included in the Plan to the east and west which are far less well related to the existing urban area to the site at Heathfield Manor.

We set out below our continued concerns regarding the sites that are included in the Plan which we would strongly contend offer no clear benefit over the Heathfield Manor site and in several cases have further challenges (i.e. heritage, accessibility etc).

Land west of Hayne Lane (Gitti\_03,04 and 05): Our clients remain concerned that the allocation of this site was based primarily on quantum and an assumed capacity rather than a consideration of relevant matters in respect of deliverability. It also a site that is distant from the core facilities of the town and accessibility during the site selection process was described as challenging. Part of the site also falls within the National Landscape, demonstrating that this does not appear to be principle for ruling out sites as suggested in the context of Heathfield Manor. The additional wording added to the policy, relating to the need to maximise opportunities to conserve and enhance the natural beauty of the site and wider national landscape setting, could equally apply to Heathfield Manor (which has already been demonstrated through the masterplanning and technical work undertaken).

The revised wording of the allocation doesn't address the previous deliverability concerns we have expressed in terms of access challenges and landscape and heritage sensitivities alongside the need for the site to come forward in a masterplan dealing with the site comprehensively and the provision of significant infrastructure. This points to a site that will take some time to come forward. It is therefore unlikely to make a significant contribution to housing delivery in the early parts of the Plan period. On that basis it is clearly a more sustainable strategy to deliver a range of sites (including Heathfield Manor) which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure and landscape setting to support the growth of the town. This will also be more beneficial in ensuring the Plan is resilient in meeting housing needs at an early stage of the Plan period.

Land adjacent to St Michaels Church and south east Cuckoo Down Lane (Honi\_07 & 12): We previously made the point that, as with Heathfield Manor, these site lie within the National Landscape but are closer to heritage assets and represent a less logical extension to the urban area in respect of form. Therefore, the allocation is inconsistent with the decision to not allocate Heathfield Manor. We also raised the point that Honi\_12 was not recommended to be allocated by officers. We note the Part 2 Regulation 19 consultation version of the Plan now excludes Honi\_12 and reduces the capacity of housing provision from 101 to 30 homes which appears to emphasise that the clear constraints of the site were not fully realised or considered at the site

selection process. It again suggests that the opportunity to maximise quantum on a few larger sites without full consideration of delivery factors was placed above identifying a range of more deliverable sites.

Land south of Northcote Hill (GH/ED/39a and b) This concern is further advanced by the revised capacity now included in the Plan for Northcote Hill, rising from 200 homes to now 310 homes. This is despite the revised policy text clearly indicating that impacts of scale and other matters on the National Landscape will require further consideration at a later stage. It further sets requirements for which there is no evidence put forward to demonstrate that the increased housing numbers could meet. The updated site selection report does not address the rationale regarding the increased quantum of housing now to be delivered on the sites, and it is therefore unclear what further assessment has been undertaken to justify this increase. The report also does not address the previous concerns raised by my clients and others regarding the challenges of these sites. In particular the access and accessibility challenges with access constrained by narrow roads under railway bridges which will require significant improvements. Whilst the revised policy wording now refers to these challenges, the need to “maximise opportunities for localised improvements and contributions to enhance sustainable travel modes” rather underplays the extent of the issue. Our concern is that any increase in capacity of these sites is not only unevidenced but may be simply a case of trying to redress the loss of numbers in Honiton as a result of the removal of Honi\_12. This would be inappropriate and does not take into account the delivery challenges of the site or the likely impact delays in bringing sites forward will have on the Plan strategy as a whole. A more sustainable approach would have been to re-consider sites previously omitted (such as Heathfield Manor). We continue to consider that there are no good reasons for the Plan not to allocate the Heathfield Manor site. It is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan’s strategy. Without having a range of sites within Honiton the Plan will over rely on more constrained sites which are more difficult to bring forward, particularly given the significant uncertainties around deliverability.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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.:** We believe further growth at Honiton should be provided for through the allocation of further sites. This will

underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Heathfield Manor is unconstrained and has previously been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan.

Policy SD03 should therefore be modified to include land at Heathfield Manor (Honi\_15) as an allocation. [see attached sketch 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)

**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, including providing evidence to support the necessary Modification of the Plan.

**Full name:** Stuart Houlet

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

**Other party name (if relevant):** Andrew and Philip Cork

**Proposal:**

5. Development in the Towns and Villages

**1. To which part of the Development in the Towns and Villages chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SD01

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**1(c). If the comment is related to a site, please state the site reference here::**

Lymp\_07, Exmo\_20, Lymp\_09, Lymp\_10a

**3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:** No

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

[This representation also applicable to Development in the Towns and Villages chapter paragraphs 5.1 to 5.3]

As set out in previous representations we are disappointed that the Part 2 Regulation 19 Consultation continues to overlook additional opportunities for housing provision at Exmouth (including sites previously identified at earlier stage of the Plan). There remains significant capacity at Exmouth for a range of smaller sites to come forward that can benefit from existing infrastructure and accessibility. This would provide greater resilience to the Plan as a whole, particularly in light of the uncertainties around Marlcombe and other larger allocated sites.

Courtlands Cross (Lymp\_07): We note no further changes have been identified to the Courtlands Cross allocation and support this. The current outline planning application for the site under determination by EDDC demonstrates how a design and landscape development on the northern edge of Exmouth can be achieved that delivers a number of clear benefits.

This includes energy efficient homes to meet local needs (including affordable housing); provision of recreational benefits through new sports pitches and a financial contribution towards a new club house; delivery of local employment opportunities; significant areas of landscaping and public space; provision of ecological habitat and enhanced pedestrian routes and connections to the wider network. The application has addressed all technical consultee comments and demonstrates that there are no outstanding constraints to development.

Land at St John's (Exmo\_20): We, alongside other respondents to the original Regulation 19 Plan consultation raised significant concerns regarding the inclusion of the St John's site at a late stage of the Plan's preparation having been previously rejected on the basis of its constraints and uncertainty of delivery (as acknowledged by officers during the site selection process).

Our previous representations highlighted the following issues:

- The site's distance from existing services and facilities rendering it unsustainable;
- Increased separation as a result of the proposed northern access onto the B3179;
- The potential for rat running on unsuitable roads and capacity issues on the existing highway network;
- Ecological sensitivities given proximity to European sites and existing extensive woodland and wildlife sites within its boundaries;
- Harm arising from impacts on the setting of Grade II\* St John's Church which contributes significantly to its special interest and is a designated asset of the "highest significance" and the likelihood of the developable area being significantly reduced as a consequence; and
- Uncertainties regarding the feasibility, viability and timing of delivering the essential infrastructure to support the site.

The Part 2 Regulation Consultation version provides additional text regarding most of the matters listed above, therefore recognising the importance of the above matters, but simply seeks to defer these critical matters to the need for further work and assessment. This further work should have been done prior to the allocation of the site and assumptions in terms of the acceptability of the site and its capacity for residential development. Assumed numbers are likely to be significantly reduced on the basis of the heritage, mineral and ecological constraints yet does not appear to have been taken

into consideration in the review of the policy and overall housing provision within the Plan.

Importantly a reduction in capacity will render the delivery of necessary infrastructure even less viable and prevent any redress of the site's distance and separation from existing services and facilities. Therefore, the Plan will not be promoting sustainable development.

The changes to the policy wording do little to address the fundamental concerns raised regarding this site, which received a substantial number of objections at the original Regulation 19 stage. We continue to believe that it is clearly a more sustainable strategy to deliver a range of sites which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure to support the growth of the town.

Land at Hulham Road (Lymp\_09 and Lymp\_10a): Given the uncertainties around St John's and Marcombe alongside other large allocations within the Plan, we are disappointed that the Part 2 Regulation 19 consultation version of the Plan continues to omit my client's site at Hulham Road. This is despite its identification in earlier versions of the Plan, officers' recommendation that it should be included in the Regulation 19 Plan and the supporting submissions previously made.

The exclusion of the site by Members on the basis of impact on trees and connectivity was unfounded as demonstrated by the current outline planning application for the site under determination by EDDC. This demonstrates how tree loss is minimal and sets out a number of improvements along Hulham Road that would significantly improve highway safety and the walking environment for pedestrians, as well as providing safe crossing points to the south to match desire lines that link to the existing footpath network. Importantly DCC Highways raise no objection to the planning application and no inherent technical constraints have been identified that would prevent the development of the site.

The site was also wrongly referred to during the site selection process as being within in the adopted Coastal Preservation Area (CPA) when it is not. Although proposed to be included in the CPA under the Emerging Plan, evidence has been provided that shows the site does not demonstrate visual openness or have views to and from the sea or to

have any visual connection that would warrant its inclusion in a revised CPA boundary. The review undertaken by Pegasus has been submitted as part of both the Regulation 18 and Regulation 19 Plan consultations.

Our position remains that there are no good reasons for the Plan not to allocate the Hulham Road site. It represents a logical extension to the town and will support a high-quality residential development alongside important highway improvements. It is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan's strategy. Without having a range of sites within Exmouth the Plan will over rely on housing delivery from site's like St John's which are more constrained and difficult to bring forward, particularly given the significant uncertainties around the deliverability of that site as highlighted above.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages 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 Development in the Towns and Villages 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.:**

We believe further growth at Exmouth should be provided for through the allocation of further sites. This will underpin the Plan's strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Hulham Road is unconstrained and has been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan. Policy SD01 should therefore be modified to include land at Hulham Road (Lymp\_09 and Lymp\_10a) as an allocation. Further work should be undertaken to underpin the allocation at St John's to address some of the clear delivery issues set out in these representations and raised as matters to be addressed within the relevant policy wording of the allocation. If these cannot be overcome and/or result in implications for quantum and delivery, then this does bring significant doubt as to whether the site should continue to be allocated.

**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, including providing evidence to support the necessary Modification of the Plan.



**Full name:** Stuart Houlet

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

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**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Adapting to Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** AR02

**1(b). Does your comment relate to one of the changes listed above?:** Yes

**3. Do you consider that this part of the Adapting to Climate Change chapter is sound?:** No

**3(b). If no, please give details of why you consider this part of the Adapting to Climate Change chapter is not sound. Please be as precise as possible.:** [This representation is also relevant to Adapting to Climate Change chapter paragraph 7.4]

Policy AR02 has been significantly amended and extended to include wider water matters. We note the further text with the policy regarding the provision of water services which is unnecessary given the statutory duty on water companies to provide connection and manage pollution. Water companies are responsible for providing sufficient water infrastructure for new development and receive significant funding as a consequence from the housebuilding industry.

It is for Local Planning Authorities to ensure that water companies are held to account rather than block and/or delay necessary and planned development. Holding the development industry to ransom over matters that they have no direct control will simply lead to the delay of sustainable development and continued unmet needs. It is not for the planning system or the development industry to address the systemic failures of regulatory regimes. Unnecessary delay in the delivery of much needed housing and other development will render the Plan ineffective.

The revised policy text continues to identify that all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day per person for water

efficiency and makes this stronger in terms of requirement by adding the words “at least”.

We previously criticised this approach for being unjustified as the only evidence underpinning the approach was an unpublished (at that time) Water Cycle Study. This could therefore not be considered sufficient evidence to set additional standards and the PPG is clear that such an approach must be justified by clear evidence. Furthermore, the Written Ministerial Statement in relation to the optional national technical standards is clear that they should be relied upon only where there is a clear evidenced need.

The Water Cycle Study has now been published but provides no clear evidence of the need for requiring the Optional Standard beyond a recommendation. The report confirms that East Devon is within an area of “Not Serious” water stress as defined by the Environment Agency. It also confirms that water bodies in East Devon are at “low to medium stress.” The Study then goes on to say “the Environment Agency has been in the process of consultation to update the determination of water stressed areas in England. With a greater understanding of population growth, climate change and environmental requirements since the 2013 publication, the outcomes of the consultation and subsequent determination of water stressed areas may change the classification of the level of stress affecting East Devon’s water bodies” (underlining my emphasis). This is clearly not a confirmed position and remains an uncertainty. It is clearly not a basis for introducing the Optional Standard when there is no clear evidence that water stress is a significant issue within East Devon when compared with the national picture. The published Water Cycle Study therefore fails to provide any sufficient justification for the policy approach.

The tests have not been met by the Plan’s evidence base and the policy approach remains unjustified.

**3(c). Please set out the modification(s) you consider necessary to make this part of the Adapting to Climate Change 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 Adapting to Climate Change 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.:** Strategic Policy AR02 should be amended by removing Part A of the policy text given these matters fall within the statutory duties of

water companies and it is unnecessary and unjustified to include these matters as a policy test.

Reference to requiring Optional Standards within Part C should be removed given it is not justified by the evidence base.

**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, including providing evidence to support the necessary Modification of the Plan.