

Filtered Data Export

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

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

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

This indicates that the draft LP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, many of the policies and provisions reflect this imbalance.

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

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

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

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Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

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

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Local Plan Vision Statement

It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

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www.carneysweeney.co.uk

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

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

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal: 2. The Vision

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

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3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

This indicates that the draft LP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, many of the policies and provisions reflect this imbalance.

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

Full name: Simon Coles

Organisation (where relevant): Carney Sweeney

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

Proposal: 2. The Vision

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: LOCAL PLAN VISION STATEMENT

It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

This indicates that the draft LP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, many of the policies and provisions reflect this imbalance.

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

Full name: Will Ridalls

Organisation (where relevant): PCL PLANNING LTD

Other party name (if relevant): Simon Stokes

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

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

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

Our client is concerned that the overall strategy of the Plan is unduly influenced by an inherent imbalance towards constraint and matters that constrain growth rather than positively planning to meet housing needs.

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Exeter

Devon

EX1 3WD

United Kingdom

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www.pclplanning.co.uk

LocalPlan@eastdevon.gov.uk

East Devon District Council

Blackdown House,

Border Road,

Heathpark Industrial Estate,

Honiton,

EX14 1EJ

Your Ref

Our Ref SH/WJR/2137

Date 27th March 2025

REGULATION 19 CONSULTATION (FEBRUARY 2025): EMERGING EAST DEVON LOCAL PLAN
2020-2042

Also at: 9 Western Road, Launceston, Cornwall, PL15 7AR t: +44 (0)1566 977000

The Keep, Creech Castle, Taunton, TA1 2DX t: +44 (0)1823 577998

Registered Office: 1A Parliament Square, Parliament Street, Crediton, Devon, EX17 2AW

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

In this context it is disappointing that the Council are seeking to benefit from the updated NPPF’s transitional arrangements, particularly as it appears to have been used with the sole purpose of enabling a lower housing requirement to be pursued. Which of course will simply continue to increase the gap between housing need and supply in the longer term. A matter that will be further impacted by the Council seeking what is an unjustified and inappropriate stepped housing delivery approach.

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

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

We elaborate further on the above concerns, that we consider risks undermining the soundness of the Plan if not addressed,

Full name: James McMurdo

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

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

In response, our client believes that the Council, in line with its vision, objectives and sustainability appraisal work, evidenced housing and employment land need, and market forces, should continue to encourage development away from National Landscapes afforded the highest level of national planning policy

protection within EDDC (e.g., World Heritage Sites; 2/3 of the district is covered by National Landscape designation).

4.

Strategic housing and employment development should be focussed within the “West End” of East Devon and/or close to it where the vast majority of key physical, social and community and green infrastructure exists or is planned for. The “West End” of East Devon (which is where all of our client’s land is), together with Exeter City is the area considered to be the economic driver for the subregion, and its growth cannot be constrained for social and economic reasons.

5.

The under supply of housing and employment land in the current plan period needs to be correctly addressed by the Council and the shortfall should be rectified within the emerging Local Plan.

6.

The Council should positively engage with ECC and accommodate the development needs of the City which cannot be met there, in the area closest to the City free from strategic development constraints (i.e. in the “West End”).

7.

Instead, against the vision, objectives and sustainability appraisal work, evidenced sub regional housing and employment land needs, and market forces, the Plan proposes C50% of its housing and employment land needs in national landscape areas and a significant majority of its “West End” housing and employment land as part of a future Part B plan making process, and does not even attempt to deal with Exeter’s unmet need.

8.

This is neither sustainable nor “sound” plan making.

Full name: Nicola Wilson

Organisation (where relevant): Devon County Council

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Objective 7 only refers to the district's built heritage.

Built heritage forms only a part of East Devon's historic environment. The district's historic environment is not formed only by its built heritage, other elements also contribute such as historic landscapes and settlement patterns as well as non-visible, designated and non-designated, heritage assets such as the Roman villa at Seaton, the early medieval iron industry on the Blackdown Hills and the sites of prehistoric and Romano-British settlements across East Devon's landscape.

Other heritage assets, such as the large prehistoric defensive sites like Hembury Hillfort and Stockland Great Castle which are fossilised in the landscape by later field boundaries, concentrations of prehistoric funerary monuments like those at Farway Hill, the waterlogged wooden remains of a late medieval sailing vessel in the mouth of the Axe at Seaton, are all national important heritage assets and protected as scheduled monuments and contribute to the district's historic environment.

The County Historic Environment Team would therefore suggest that Objective 7 be reworded to state:

"Our outstanding historic environment", rather than just the built element of the historic environment, and that its aim should be reworded to "To conserve and enhance our outstanding historic environment."

Full name: Karime Hassan MBE

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

The representation is in general supportive of the vision and spatial strategy, and the recognition that cross boundary cooperation between East Devon and Exeter City Council is essential to discharge the duty to cooperate and to ensure the proper planning of the area, providing the essential infrastructure in a timely fashion to support the aims and objectives of the Emerging Local Plan over the Plan period. This is especially important and critical to the soundness of the Plan given the immediate uncertainty for local government faced with local government reorganisation, the creation of new unitary councils for Devon, possible devolution and elected mayors, and the immediate past record on political cooperation for strategic planning in the wider Exeter area.

Full name: Kim Miller

Organisation (where relevant): Historic England

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: We are supportive of many of the Plan Objectives, in particular those relating to Promoting vibrant town centres, Our outstanding built heritage, and Supporting sustainable and thriving villages.

Full name: Malcolm Dicken

Organisation (where relevant): NHS Devon Integrated Care Board and Royal Devon University Healthcare NHS Foundation Trust

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Within the Regulation 19 Local Plan it is stated that it has been drafted with consideration to the new NPPF published in December 2024 which specifically states that there is need for faster delivery of other public service infrastructure such as health and also that significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.

The proposed plan also continues in 2.7 and 2.8 that:

2.7we will strive to secure better facilities, especially where there may be current deficits in provision, including for schools and medical services. This will include in locations where past housing development has occurred without adequate services.

2.8 New, expanded and improved physical, social and community facilities and infrastructure will be delivered alongside development.....

These statements are consolidated with in Objective 10 of the plan objectives:

To secure infrastructure needs at an appropriate time to support new development

Full name: Steve Havers

Organisation (where relevant): National Highways

Other party name (if relevant): -

Proposal: 2. The Vision

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: The Local Plan Vision of East Devon as a “diverse, inclusive and thriving place to live and work and a pleasure to visit and enjoy” is supported by 11 objectives which set a framework for the Plan policies. Objective 9 seeks to promote sustainable transport, whilst Objective 10 seeks to secure infrastructure needs at an appropriate time to support new development. Both these objectives are supported by National Highways given the potential impact of new development on future travel demands.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Table I Plan Objectives

Objective 2 ‘...moves the district towards delivering net-zero carbon emissions by 2040’ should be strengthened to state that net-zero carbon emissions will be achieved by 2040. We would also urge the council to revise their targets to ‘net-zero/positive’.

Objective 3 ‘To provide high quality new homes to meet people’s needs’ should be reworded to state ‘sustainable, high quality new homes’.

Objective 5 ‘To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.’ Reference to the need for ‘green’ town centres should be included here.

Objective 6 ‘To promote high quality beautiful development that is designed and constructed to meet 21st century needs’ should be reworded to ‘sustainable, high quality’.

Objective 8 We welcome the inclusion of an objective which seeks to achieve an outstanding natural environment. However, we believe the language used for the objective should be stronger to ensure that an outstanding natural environment is delivered. ‘and support an increase in

biodiversity’ should be replaced with ‘and deliver an increase in biodiversity’.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Table I Plan Objectives

Objective 2 ‘...moves the district towards delivering net-zero carbon emissions by 2040’ should be strengthened to state that net-zero carbon emissions will be achieved by 2040. We would also urge the council to revise their targets to ‘net-zero/positive’.

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Objective 5 ‘To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.’ Reference to the need for ‘green’ town centres should be included here.

Objective 6 ‘To promote high quality beautiful development that is designed and constructed to meet 21st century needs’ should be reworded to ‘sustainable, high quality’.

Objective 8 We welcome the inclusion of an objective which seeks to achieve an outstanding natural environment. However, we believe the language used for the objective should be stronger to ensure that an outstanding natural environment is delivered. ‘and support an increase in

biodiversity’ should be replaced with ‘and deliver an increase in biodiversity’.

Full name: Helen Parr

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: 2.10. " Supporting jobs and the economy" Where is the employment provision for the development proposed in Colyton?

Full name: Richard John Eley

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.1

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

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: This section appears to be AI generated, and is therefore better written than the Introduction. It is meaningless, of course, in that it simply replicates standard expressions of absurdly optimistic expectations. But it will be legally compliant, no doubt.

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: It is mindless jargon, and clearly insincere, but it will be regarded as 'sound'.

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

4(a). If yes, and you wish to support this part of the vision chapter's compliance with the duty to co-operate, please use this box to set out your comments. : It is irrelevant and comprised of journalese patter, but it complies.

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: Rob Wallbank

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.2

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Chapter 2 sets out a vision. 2.2 is at odds with conservation and climate emergency! You are proposing building on the land which is the amenity, and I fail to see how the proposals have better access to surrounding countryside. They do that now, but by building new homes on green land, pushes existing housing further way from the ever diminishing countryside.

Full name: Karime Hassan MBE

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.4

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: [Representation on behalf of Exeter Rugby Group based in Exeter close to Junction 30 of the M5 at Sandy Park. See also upload of full representation]

The Vision statement text acknowledges the second new community will be a council and corporate led development. Therefore, given the uncertainties that presently exist for local government and the likely demands on the viability of key projects, Strategic Policy SP07: Delivery of Infrastructure; and Strategic Policy SP08: Phased Delivery of Infrastructure and Services are essential, and supported, and to be read along with Strategic Policy WS01: Development of a second new community east of Exeter.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Church Commissioners

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.4

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: [Representation on behalf of the Church Commissioners who comment in the context of land owned at Clyst Honiton. Full representation uploaded which has been added to Commonplace linked to the specific policies commented on]

The Commissioners is a registered charity that supports the work and mission of the Church of England across the country. Its investment policy is to hold a diverse portfolio of investments across a broad range of asset classes consistent with its ethical guidelines. Its Strategic Land team brings forward land for new housing development with the aim of delivering new homes and employment opportunities which support and enhance the local community. Many new developments also include new schools,

community facilities, and new areas of open space, which benefit not only new residents but also neighbouring communities.

The Commissioners own land in Clyst Honiton, East Devon, known as the Clyst Honiton Bypass Site('the Site'). The Site has previously been submitted to the East Devon District Council (EDDC) Call for

Sites consultation and Preferred Options Regulation 18 Consultation, as well as the to the Clyst Honiton Neighbourhood Plan and Greater Exeter Strategic Plan Call for Sites in April 2017. The Site is proposed

to be brought forward for development under a Neighbourhood Development order, and was considered as an allocation in the Regulation 14 Clyst Honiton Neighbourhood Plan consultation. This was subsequently disregarded as it was understood that the Neighbourhood Development Order would not be brought forward on the same timeline as the now made Clyst Honiton Neighbourhood Plan. A plan showing the location of the site is included at Annex 1. The Commissioners continue to engage with

the Clyst Honiton Steering Group in relation to the emerging neighbourhood Development Order.

The Commissioners generally support the vision and objectives set

out in the consultation document. In short, the

Commissioners support the focus for new development in the western part of the District and the introduction of the New Town under Strategic Policy WS01. Whilst this is supported, the

Commissioners acknowledge that EDDC are not seeking to address the full housing need of the district as established by the new standard method of the December 2024 NPPF.

Full name: Helen Parr

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.6

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: What studies of local communities' needs have been carried out? What were the criteria for assessing a community's needs? What study of Colyton's "needs" has been published, apart from the Devon Communities Together 2022 "Housing Needs Report" which looked into the need for Affordable Housing in Colyton? How was open market housing "need" in Colyton assessed?

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Define "modest"

Define "needs"

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

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

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

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

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

Full name: Rob Wallbank

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.6

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Para 2.6 is at odds with Set 02, Seat 03 and Sea 13a, whereby you're not respecting existing farming at these sites, reducing key and important rural activities and diminishing our ever decreasing agriculture in a part of the country that makes it so important. Air quality is so needed, and building over green spaces is not in keeping with green polices and carbon net zero claims.

Full name: Samuel Glanfield

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.6

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: Local Plan states that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development”. The allocation of Exmo 20 is in conflict with this; it is not modest development. It is a “comprehensive development scheme”.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove allocation Exmo 20

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

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

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: Samuel Glanfield

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.6

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: Paragraph 2.6 states that “Rural East Devon will retain its outstanding charm and character with modest and sensitively planned development”. Allocation of Exmo 20 is in conflict with this; it is not ‘modest’ development. It is a ‘comprehensive development scheme’.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the allocation of Exmo 20, or reduce it to a modest development.

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

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

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: Rob Wallbank

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.7

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Para 2.7/2.8 are quite simply, flowery words, and means nothing. New development cannot and never will draw on outstanding heritage legacy; it destroys it. It goes on to state you will “strive” to secure better facilities. How? Developers are interested in profit, but building facilities won’t happen because it hasn’t in the past. The seats 02,

03 and 13a are too small in terms of dictating such improvements to infrastructure, so the burden gets swallowed up in the existing over stretched ones, which will impact on existing residents and new ones alike but most of all, polluting the environment. The local area will not be greener! It will become more tarmac and concrete with greater flooding and reduced biodiversity. Building reduces the biodiversity, and in my experience only ruins it. Green spaces are lost for good; there will be no green tapestry!

Full name: Helen Parr

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.8

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: 2.8 “ New expanded and improved... alongside development”

What assessments of community infrastructure needs have been carried out eg. for primary education provision including at Colyton?

When will the Water Cycle Study, be published?

Confidential Draft sent to Councillors July 2024

Sewage system in Colyton inadequate, no capacity to support development.

Full name: Martin Shaw

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.8

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: Because the plan proposes that new infrastructure be delivered alongside development, but includes no mechanisms for ensuring this.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Propose mechanisms and/or specify that where new infrastructure will not be delivered alongside development, there will be a presumption that applications will be refused.

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

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

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: Kim Miller

Organisation (where relevant): Historic England

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.9

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: We are supportive of the Local Plan vision insofar as it relates to heritage and we welcome the reference at 2.5 to regenerated town centres, many of which include areas of historic character.

We also welcome the reference at 2.9 to protecting and enhancing 'built heritage assets' but as not all heritage assets are buildings (for example Registered Historic Parks and Gardens and some Scheduled Monuments) we request that this is broadened to refer to the 'historic environment'. This will ensure that the plan is consistent with relevant legislation and national planning policy.

Suggested modification: "2.9. Our beautiful and diverse countryside, National Landscapes, world class Jurassic coast, nature reserves and the historic environment including built heritage assets will be protected and enhanced."

Full name: Helene Jessop

Organisation (where relevant): RSPB

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.9

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: Para 2.9 makes no mention of the statutorily protected nature conservation sites (eg Exe Estuary Special Protection Area, Site of Special Scientific Interest and Ramsar site, and the East Devon Pebblebed Heaths Special Area of Conservation and East Devon Heaths Special Protection Area, and East Devon Pebblebed Heaths SSSI). The RSPB considers it essential that the Local Plan specifically highlights the presence sites which are of national, European and international importance for their habitats and species.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Amend para 2.9 to "Our beautiful and diverse countryside, National Landscapes, world class Jurassic coast, statutorily protected sites of national, European and international importance for wildlife (including the Exe Estuary Special Protection Area, Site of Special Scientific Interest and Ramsar site, and the East Devon Pebblebed Heaths Special Area of Conservation and East Devon Heaths Special Protection Area, and East Devon Pebblebed Heaths SSSI), nature reserves . . . with biodiversity improvements (including restoration and enhancement of existing assets as well as creation of new opportunities for wildlife)". This modification will make clear the Plan's recognition that East Devon includes these legally protected nature conservation assets (which are vulnerable to the effects of development proposed within this Plan) and that the Plan will protect and enhance these.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The RSPB considers this proposed amendment to explicitly mention the statutorily designated nature conservation sites here will make clear that the East Devon Local Plan accords them priority status along with National Landscapes etc.

Full name: Chrissie Hunn

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.9

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

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

2(b). If no, please give details of why you consider this part of the vision chapter is not legally compliant. Please be as precise as possible.: Exmouth 17 is in the National Landscape, but yet is up for potential development of 450 houses. To have major development will permanently negatively affect the existing biodiversity and goes against the increase of protection in legislation by the current government to protect the National Landscape.

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove development sites in protective areas.

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

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

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

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

Full name: Sara Davies

Organisation (where relevant): Lympstone Water Quality Group

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.9

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

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

2(b). If no, please give details of why you consider this part of the vision chapter is not legally compliant. Please be as precise as possible.: There is no reference to the fundamental importance of our natural watercourses in East Devon (to the environment, economy, and human health and wellbeing), or to the vital role that the Local Plan should be playing in helping to adapt to climate change, prevent water pollution, increase biodiversity, improve human health and wellbeing, and improve the local economy by enhancing the image of our natural waters.

This demonstrates that the Sustainability Appraisal is not robust (it does not adequately address these issues). There is also no evidence in the 'Evidence Library' that water quality issues have been considered. There is now a growing body of local and national data and guidance on these issues (e.g., the Planning Advice for Integrated Water Management report, and House of Commons Environmental Audit Committee Report on Water Quality in Rivers). Please note that this does not just relate to sewer overflows but also to pollution from roads, agriculture, construction, residential properties and other infrastructure (all exacerbated by climate change).

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Refer to the fundamental importance of our natural watercourses in East Devon, and to the role of the Local Plan, and related policies and procedures, in protecting and improving water quality. But, first, consider and address the fact that the Sustainability Appraisal does not highlight the importance of water quality issues across all of East Devon, and the lack of evidence on water quality in the 'Evidence Library'.

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: A strong vision statement is vital to the success of the Local Plan. The fact that it completely misses the importance of our natural watercourses, the growing concerns and pressures on water quality, and the vital role of the planning system in protecting and improving water quality, indicates that the whole Local Plan is not sound. It is not consistent with national policy, does not align with National Planning Policy Framework Section 15, Paragraph 180 (e), and does not reflect the growing body of national and local evidence available on water quality (Note: There is no information in the 'Evidence Library' to show that this evidence has been considered).

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Update the vision so it reflects the importance of our natural watercourses, and the role of the planning system in protecting and improving water quality and biodiversity. See 'Planning Advice for Integrated Water Management', <https://catchmentbasedapproach.org/wp-content/uploads/2018/09/Planning-Advice-Note.pdf>

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

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

4(b). If no, please give details of why you consider this part of the vision chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The fact that the vision does not reflect the importance of the natural watercourses, and the growing pressures on water quality due to climate change and development, indicates that there has been inadequate cooperation on these issues which relate to both environmental protection and infrastructure planning.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To highlight the findings of our catchment-based water quality project in Lymptone on the Exe Estuary and our consultations with national specialists and other community groups. We believe the East Devon Local Plan is not sound. It has not considered a major body of evidence at national and local levels, does not follow national advice and guidance, and does not address local priorities.

Full name: Sam Scriven

Organisation (where relevant): Jurassic Coast World Heritage Site (hosted by Dorset Council)

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 2.9

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

4(b). If no, please give details of why you consider this part of the vision chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Wording in reference to the Jurassic Coast is inaccurate and does not conform to national planning or WHS management framework. The way the WHS is referenced should be consistent across relevant documents including ED Local Plan and Dorset Local plan. Current wording of paragraph 2.9 includes the statement 'world class Jurassic coast'. I recommend this is changed to 'unique Jurassic Coast World Heritage Site'. Please note; whenever phrases Jurassic Coast or World Heritage Site are used separately or together within the plan they should be capitalised.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 3

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client supports the settlement hierarchy and, in particular, the identification of Woodbury as a Tier 3 Local Centre. A dispersed approach to growth is the most appropriate strategy to meet the area's needs for housing and jobs.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Full name: Neal Jillings

Organisation (where relevant): Summerfield Homes Ltd

Other party name (if relevant): -

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 3

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

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: The spatial strategy as set out on the key diagram is supported, with growth in the main towns and various service villages. Providing growth in villages is essential.

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s) ? : No, I do not wish to participate in hearing session(s)

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

Full name: John Ernest Bailey

Proposal: 2. The Vision

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 3

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

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: Yes, but ultimately will be dictated by parliament which has no intention of allowing this council or, indeed any other to implement a practical and considered policy based on availability of services like, adequate medical services, adequate roads etc. To complete these tasks effectively we require, not just academic ability, but a high level of management and deep practical understanding of cultural diversity along with, the many different professions needed to complete the task.

There is little doubt in my mind that the majority of MPs representing this country have few if any of the aforementioned qualities that are required, so will therefore simply dictate to this and similar councils what they want to achieve without the ability to consider the obvious outcome.

The reasons for answering Yes to this question is simply because parliament dictates the laws in this country and will change laws to favour their own objectives.

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

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

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

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

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kisingbury on behalf of L Askew

Proposal: 2. The Vision

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

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client welcomes and share the aims and objectives of the draft Local Plan.

A core objective of the Plan is to support business investment and job creation opportunities within East Devon and support a resilient economy. Our client wholly supports this ambition which represents an important step in the right direction, but this must include the identification of sufficient land to meet a range of employment needs.

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kisingbury on behalf of L Askew

Proposal: 2. The Vision

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

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client welcomes and share the aims and objectives of the draft Local Plan.

A core objective of the Plan is to support business investment and job creation opportunities within East Devon and support a resilient economy. Our client wholly supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of new development including employment and commercial floorspace will help support mixed and balanced communities, ensuring sustainable growth for all.

Full name: Chris Dadds

Organisation (where relevant): JLL

Other party name (if relevant): Charles Kisingbury on behalf of L Askew

Proposal: 2. The Vision

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

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client welcomes and share the aims and objectives of the draft Local Plan.

A core objective of the Plan is to provide high quality new homes to meet people's needs. Our client supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring development will be viable and hence delivered. The delivery of much needed new homes will need to be balanced alongside other land uses including commercial and community facilities to ensure sustainable growth for all.

The Plan also seek to actively respond to the climate and ecological emergencies in securing sustainable development. These objectives are wholly supported by our client.

Full name: Jess Perminter

Organisation (where relevant): Carney Sweeney

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

Proposal: 2. The Vision

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

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

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet in full the District's housing needs, reflecting the Framework and the above Written Ministerial Statements, which are material considerations.

This indicates that the draft EDLP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, the policies and provisions throughout the draft EDLP reflect this imbalance.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations. It should also refer to the second new community and the wider strategic role of the West End as a sustainable location for meeting housing and other needs.

Full name: Jess Perminter

Organisation (where relevant): Carney Sweeney

Other party name (if relevant): DAAB Partnership

Proposal: 2. The Vision

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

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

This indicates that the draft LP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, many of the policies and provisions reflect this imbalance.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal: 2. The Vision

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

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

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: The following section contains specific policy comments and follows the order of the draft local plan.

C G Fry fully endorses the aspirations of the plan to raise standards and deliver high quality development and good design and the need to assess and mitigate the impacts of development.

However, this is subject to the following caveats:

- All proposed local policies must be justified.
- Potential impacts on viability and deliverability must be properly understood.
- Policies should not seek to unnecessarily replicate the NPPF or Building Regulations (or other regulatory regimes).
- Policies should not be drafted in such a way that they hinder or discourage development.
- Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations.

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It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.

This indicates that the draft LP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, many of the policies and provisions reflect this imbalance.

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

Full name: Simon Coles

Organisation (where relevant): Carney Sweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal: 2. The Vision

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

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet in full the District's housing needs, reflecting the Framework and the above Written Ministerial Statements, which are material considerations.

This indicates that the draft EDLP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, the policies and provisions throughout the draft EDLP reflect this imbalance.

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and

provisions of the plan, in accordance with our representations. It should also refer to the second new community and the wider strategic role of the West End as a sustainable location for meeting housing and other needs.

Full name: Rachel Danemann

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

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: The Vision and Objectives are not positively prepared and as such the Plan is unsound

20. Objective 3: Meeting future housing needs, seeks to provide high quality new homes to meet people's needs.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: In order to be positively prepared HBF believe the Plan should set out its objective to meet the Housing Needs of East Devon in full.

Full name: will halwyn

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: broadly in support, in particular objective 1 and 2 , 8 and 9.

3(b). If no, please give details of why you consider this part of the vision chapter is not sound. Please be as precise as possible.: I do feel there should be a principle of proportional development; i.e. that one shouldn't double the size of a settlement in a short period of time, and that where such quantities of housing are needed, well planned new towns or villages are better than "bolting on" houses where amenities are not proportionate.

I do also feel there should be an emphasis on using existing brownfield sites and protecting our farmland and natural spaces where possible.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

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

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

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

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: The vision and set of objectives seems appropriate, with climate emergency being to the fore, but the biodiversity crisis should also be recognised as of equally importance.

Full name: John Thorne BA DipTP MRTPI(Rtd)

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: Lacks positive commitment to achieving BNG

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 'Support' an increase in Biodiversity should read 'Achieve' an increase...

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

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

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: RICHARD MALCOLM CRABTREE

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

2(a). If yes, and you wish to support the legal compliance of this part of the vision chapter, please use this box to set out your comments.: How are you going to ensure our rivers in East Devon and sea are not as badly polluted as they are now?

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See 2a above.

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

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

4(b). If no, please give details of why you consider this part of the vision chapter fails to comply with the duty to co-operate. Please be as precise as possible.: You should mention which organisations you intend to co-operate with to achieve objective 8. It seems to me that you cannot do this alone.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: -

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision 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 vision chapter is not sound. Please be as precise as possible.: I do not believe that Lithium batteried EVs are the best prospect for a sustainable green future over the time period.

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: include other future technologies (eg hydrogen cell batteries) in the narrative.

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

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

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

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

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

Full name: -

Organisation (where relevant): -

Other party name (if relevant): -

Proposal: 2. The Vision

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

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

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

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

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

2(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client welcomes and share the aims and objectives of the draft Local Plan.

A core objective of the Plan is to support business investment and job creation opportunities within East Devon and support a resilient economy. Our client wholly supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of new development including employment and commercial floorspace will help support mixed and balanced communities, ensuring sustainable growth for all.

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

3(c). Please set out the modification(s) you consider necessary to make this part of the vision chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: -

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

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

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

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

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