

Appendix 18a:

East Devon Local Plan 2020 to 2042– Second Regulation 19 Publication Draft (November 2025)

Representations on behalf of **Bloor Homes
Exeter and Stuart Partners Ltd**

January 2026

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Our reference
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Executive Summary

1. Together Bloor Homes and Stuart Partners Ltd share significant land control within the area identified as the proposed allocation for the Marlcombe new community (Strategic Policy WS01). Whilst Bloor Homes and Stuart Partners strongly support the emerging policy for the new community, there are aspects of the plan (as a whole) and aspects of Strategic Policy WS01 that are of concern and various objections that are made to some policies and some details within policies, which should be modified in the interests of the soundness of the plan overall.
2. Bloor Homes and Stuart Partners have a formal collaboration agreement in place and, between them, provide considerable development expertise. Collaborative working has extended to include Cherwell Group and LVA who, as further highly experienced developers, bring further experience and expertise to the landholder group. This combined expertise places the landholder group in very strong position to support EDDC in bringing forward the new community, including the delivery of employment, homes, and social and community infrastructure in partnership with the Council.
3. There is also strong support for the proposed further new-community development (Marlcombe - as identified at Part A of Policy SP01) which is a pragmatic and robust response to plan for the development of East Devon and this part of the wider sub-region in the South West.
4. The new employment land being proposed as part of Policy SP04 allows for some flexibility and choice, which is supported and is a positive overall approach, although the plan could do more to positively meet current and future employment land needs. It is essential that the plan positively makes provision for employment land to be available in the right locations and at the right time across East Devon (to respond to the demands and needs of the market). It is also unclear how the plan has considered the potential for there to be unmet or displaced employment land needs arising from within the City of Exeter, which the West End of East Devon would be well placed to meet.
5. Proposals to identify, allocate and develop a second new community within East Devon, as proposed by the plan and specifically Policy WS01, are strongly supported, as there is very strong evidence to support the merits of providing for strategic scale development in the relatively unconstrained and strategically well located 'West End' of East Devon.
6. However, there is concern that Policy WS01 as drafted does not provide a sufficiently clear and concise policy to provide an effective framework for the future delivery of the new community. There is significant scope to improve the effectiveness of the plan by making Policy WS01 shorter and more focused in its format and language to aid clarity on the essential aspects of the development for Marlcombe and how these will be brought forward. We would encourage the Council to review this further as part of any modifications and the Examination process.
7. The proposed policy wording does not provide clarity around how and in what way the allocation development is expected to facilitate infrastructure capacity for a future larger scale of development, and at what scale this might reasonably be (if it is in excess of 10,000).

8. With respect to the phasing of the allocation development, which it is agreed will be necessary, this will be informed and guided by the allocation wide masterplan and associated Infrastructure Delivery Strategy, and it is essential that this is subject to input/agreement from/by relevant owners and developers within the development, who will be key stakeholders responsible for and able to facilitate delivery on the trajectory envisaged.
9. The aspiration to see significant delivery of new homes at Marlcombe during the plan period is supported as this strategic development can make a significant contribution; however, the delivery trajectory provided as part of the evidence base is ambitious and expects (requires) first housing completions at the new community in 2029/30 (144 homes). To achieve this, it will be essential that design, technical and work on planning applications (as well as planning applications themselves) are progressed in parallel with the examination and adoption of the plan.
10. Achieving 40% affordable housing on a strategic development of this scale will be challenging and the provision made for an “aspiration” for 40% is vague and will not be effective. Whilst the ‘aspiration’ for achieving 40% affordable housing might remain, a clear understanding of a viable ‘baseline’ affordable housing percentage is required, with clear policy explanatory text which confirms that 40% affordable is subject to securing the necessary grant funding.
11. There are a number of further clarifications and amendments that are required to Strategic Policy WS01 especially in respect of the type and scale of infrastructure to be provide, and how this will be achieved, as set out within our detailed comments on these matters – this includes the fact that the full package of expected highway improvements and transport projects must be fully accounted for as part of the viability assessment for Marlcombe (with the associated cost apportioned on a suitable pro-rated basis), and that the approach to affordable housing provision requires further clarification and amendment.

1. Introduction

Introduction

- 1.1 This response has been prepared by **Turley** on behalf of both **Bloor Homes Exeter** [“Bloor Homes”] and **Stuart Partners Ltd** [“Stuart Partners”], to provide representations to East Devon District Council [“the Council”], in relation to the East Devon Local Plan [“EDLP”] Regulation 19 consultation March 2025.
- 1.2 Together Bloor Homes and Stuart Partners Ltd share significant land control within the area identified as the proposed allocation for the Marlcombe new community (**Strategic Policy WS01**). We hope this response is useful and look forward to participating in future stages of the plan making process, as well as progressing matters with respect to the delivery of the exciting new development at Marlcombe.
- 1.3 Whilst Bloor Homes and Stuart Partners strongly support the emerging policy for the new community, there are aspects of the plan (as a whole) and aspects of Strategic Policy WS01 that are of concern and various objections that are made to some policies and some details within policies, which should be modified in the interests of the soundness of the plan overall.

Collaborative Working with Other Marlcombe Landholders to Date

- 1.4 Officer’s will also be aware that Bloor Homes and Stuart Partners have been working together on the promotion of this area for a second new community since 2019, dating back to the initial consideration of a second new community in East Devon in the previously emerging Greater Exeter Strategic Plan.
- 1.5 Bloor Homes and Stuart Partners have a formal collaboration agreement in place and, between them, provide considerable expertise and experience as one of the largest providers of new homes in the UK and as a major employer and owner and operator of employment space and energy infrastructure in East Devon.
- 1.6 Our collaborative working has extended to include Cherwell Group and LVA and, as highly experienced developers, they bring further experience and expertise to the landholder group. This combined expertise places the landholder group in very strong position to support EDDC in bringing forward the new community, including the delivery of employment in step with the delivery of homes, and social and community infrastructure in partnership with the Council.
- 1.7 The landholders recognise and support East Devon District Council’s (EDDC’s) ambitions and shared objectives for the second new community and have welcomed the opportunity for ongoing discussions on collaborative working with EDDC and wider stakeholders. This has included a series of strategic meetings and workshops on key matters and has also including the production of a Heads of Terms document which confirms our collective agreement and approach to further collaborative working to deliver this important new community.
- 1.8 Beyond meetings with EDDC, we have met regularly as a landholder group; we have progressed initial joint technical work to support the feasibility and deliverability of shared infrastructure (which we have presented to EDDC and its masterplanning

partners); and we will be progressing further joint technical and design work in order to support the progression of the new community in a phased and coordinated manner. We also recognise and support the need for infrastructure costs to be equalised across the new community.

- 1.9 Finally, that landholder group are clear on the need for that collaborative working to be progressed expediently to deliver on the shared objectives, including the delivery of new homes in accordance with the emerging Local Plan trajectory, employment and jobs in step with the delivery of homes and the early delivery of social and community infrastructure.
- 1.10 We look forward to positively engaging with the Council in respect of the Local Plan and the proposals for the emerging new community. Should any further information be required because of or to support this response, then please do not hesitate to contact us.

2. Policy Responses

Strategic Policy SP01: Spatial strategy [Support]

- 2.1 In respect of the component of the Spatial Strategy that directs significant levels of development to the West End of the district (Part A) this is strongly supported, as the available evidence strongly supports this as a suitable a logical location to meet a large proportion of the development needs within East Devon.
- 2.2 This evidence relates to the relative absence of constraints (such as designated landscapes) and the proximity to the City of Exeter and other major strategic developments in this area, as well as associated infrastructure (such as the M5 and Exeter Airport).
- 2.3 There is also strong support for the proposed further new-community development (Marlcombe - as identified at Part A of **Policy SP01**) which is a pragmatic and robust response to plan for the development of East Devon and this part of the wider sub-region in the South West.
- 2.4 Marlcombe is a location which now has endorsement from the New Towns Taskforce ["NTT"], an expert advisory panel established in September 2024 to support the government to deliver the next generation of new towns. It is not yet known if the Marlcombe new community will be selected for inclusion in the government's formal programme for the delivery of new towns; however, the recognition that this location has significant potential for growth at the scale envisaged is important, where this development will be required as part of the strategy for East Devon in any event.
- 2.5 Planning for a second new community (with the associated delivery of new homes and employment opportunities) represents a very positive and pro-active approach from the Council, which is reflective of national planning policy, which advocates ensuring that strategic planning policies consider timescales which are beyond the plan period, on the basis that:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements....." [NPPF para 77] and that

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt" [NPPF para 85].

Strategic Policy SP02: Levels of future housing development [Object]

2.6 Paragraph 3.9 within the plan states that the policy:

“...responds to the Council’s priority of addressing housing needs by establishing a clear housing requirement based on the Standard Method using latest ONS statistics”.

2.7 This is not the case as the Council is seeking to progress its plan using the transitional arrangements available as part of the NPPF (December 2024), by making provision for only 80% of the housing need which is now identified by the latest version of the Standard Method. The approach being taken by the plan (and specifically **Policy SP02**) is not consistent with the Council’s stated aim and approach as recorded at Paragraph 3.9. This in turn is not consistent with national planning policy that seeks to boost significantly the provision of new housing.

2.8 The level of housing being planned for by the plan is not consistent with latest national policy on need (as reflected in the up-to-date standard method for Local Housing Need), with even the annual provision in the later years of the plan (1,070dpa based on a stepped trajectory) less than the new minimum figure of 1,118dpa which is derived from the version of the Standard Method used to prepare the plan and contained within the first Regulation 19 consultation document (and which is less than the most recent version of the standard method calculation for East Devon which would be 1,156dpa), and which is the basis for the 80% minimum threshold to progress using transitional arrangements.

2.9 Although no specific unmet need has yet been identified to exist, the Council’s approach also makes no provision for any unmet needs for housing, that may arise within the City of Exeter, and where East Devon District may be well placed to meet those needs. The preparation and examination of the Exeter Local Plan will be occurring in parallel with that in East Devon and so there will remain a need to retain flexibility and act responsively in the interests of planning for this important part of Devon and wider South West.

2.10 There is support for the potential that the new community will contribute the delivery of 3,300 new homes within the Local Plan period to 2042. This level and pace of housing delivery remain ambitious, and Bloor Homes and Stuart Partners intend to work proactively with the Council to bring forward proposals at Marlcombe quickly in order to support the ambition, as far as is reasonable. However, such progression will require additional detail (as part of Strategic Policy WS01) and significant proactive collaboration on delivery with the Council and other stakeholders.

2.11 As is set out within the Housing Delivery Technical Report (HOU-001(rev)), the Council is expecting that the new community development will contribute 144 new homes (completions) in the 2029/30 monitoring year, with then a further 144 new homes in 2030/31 and increased rates of delivery beyond this (peaking at 360 dwelling in each of the final two years of the plan). Given the lead in times required for development on this scale and assuming the adoption of the plan during 2027 (as set out in the Council’s October 2025 LDS) it will be essential that the work on the preparation for delivery of development at Marlcombe proceeds at pace in parallel with the Examination and Adoption of the Local Plan. To achieve this the Council will need to work pro-actively and

collaboratively with developers, promoters and landowners in order that relevant design and technical work can be progressed to support planning applications which will achieve this development trajectory. The submission of planning applications, in parallel with the preparation and examination of the plan will be essential if these completions are to be achieved.

- 2.12 In addition, whilst we are aware that the Council has ambitions to ultimately set up a Development Corporation to take forward, deliver parts of and manage the stewardship of the new community in long term, it is important to recognise the timescales required to put in place such Governance and ensure that such aspirations do not undermine the pace of delivery at Marlcombe, which is required to meet the Plan's trajectory expectations. Early applications can deliver important new homes, employment, physical, social and community infrastructure whilst not undermining the future Governance aspirations of the Council.
- 2.13 Finally, alternative models for development, including where the use of CPO may be required, are unlikely to achieve the scale and pace of development required by the plan and further early clarity on this remains important (irrespective of the outcome of and any decisions made concerning the government's new towns programme).
- 2.14 Further comments on delivery as part of **Strategic Policy WS01** are made in respect of subsequent parts of the plan, it remains important that there is confirmation of how the Council expects this scale and pace of delivery to be achieved, as it is critical to the success of the plan overall.

Strategic Policy SP04: Employment provision and distribution strategy [Modification Required]

2.15 The new employment land being proposed as part of **Policy SP04** allows for some flexibility and choice, which is supported and is a positive overall approach, although the plan could do more to positively meet current and future employment land needs. It is essential that the plan positively makes provision for employment land to be available in the right locations and at the right time across East Devon (to respond to the demands and needs of the market).

2.16 It is also unclear how the plan has considered the potential for there to be unmet or displaced employment land needs arising from within the City of Exeter, which the West End of East Devon would be well placed to meet. Indeed, as part of the Exeter Local Plan Examination, the Inspectors are holding initial hearings and, in their initial 'Matters, Issues and Questions' document, they have raised the following:

"The Council states that it has demonstrated cooperation on strategic matters with East Devon District Council (EDDC) as shown in the agreed Statement of Common Ground (SoCG). However, there remains disagreement on strategic matters relating to employment land. The Exeter Plan relies on land outside its boundaries for employment, in particular land within East Devon and Teignbridge. EDDC have stated that the employment land within their local authority boundary would only meet their needs and not those of Exeter."

2.17 As with respect to the level of future housing development, there will remain a need to retain flexibility and act responsively (as the Examination of the Exeter Local Plan takes place in parallel with the preparation and submission of this plan) in the interests of planning for this important part of Devon and wider South West.

2.18 With respect to the employment land proposed to be provided as part of the new community development (Strategic Policy WS01), it is not possible to give unequivocal support absent the detailed master planning and viability work that is required to support this proposal and as is covered in our separate submissions on this part of the plan, however, there is a clear demand for employment in this part of East Devon and the principle of employment land and development to come forward in step with homes is supported.

2.19 The Plan should recognise that there are opportunities to deliver employment development on land within and around the new community allocation (adjacent to the existing business park at Hill Barton) early in the plan period – this could form part of the masterplan and phasing details referenced under other policies for the new community, where opportunities for "early wins" are encouraged, where additional employment land and local jobs can be provided as part of an expansion to Hill Barton Business Park in a way that is complementary to (and does not prejudice) the delivery of the new community development, including in respect of the masterplan and key elements of infrastructure. This potential opportunity should form part of the Council's ongoing masterplan, phasing and delivery review and be presented as part of the further/future detail and evidence for this area. Indeed the evidence may conclude that there is potential for this element (new large format employment development) to take place

within the southern part of the new community allocation area (on land at and adjacent to the Hill Barton Business Park) in an independent but complimentary way to the overall new community scheme, where this is shown to help enhance and not prejudice this wider opportunity coming forward. This would include having regard to any interfaces with surrounding land, and the provision of appropriate access and transport links (to site boundaries) such that these can “plug in” to the future development, should this be required (flexibility is key).

- 2.20 It is also noted that the quantities of land that are specified in **Strategic Policy SP04** (for employment uses) are not clarified to be either maximum or minimum amounts. Given the overall approach to provide flexibility (as part of providing for a range and choice of land options) this may not be inappropriate, but it should also be clarified that the very specific figures provided are not a ceiling, nor should they be read to otherwise constrain appropriate employment land opportunities from being brought forward. There is an opportunity to further clarify this provision as part of the work that would be required to progress the delivery of Marlcombe, including masterplanning and phasing work to understand how the proposals for “around” 16.5ha of employment land that are specified for the new community, including how that quantum is to be provided for within the new community, noting opportunities for employment provision on and around Hill Barton Business Park, within new areas of employment within the new community, and the opportunities for employment provision with the town centre and neighbourhood centres that are expected.

Strategic Policy SP08: Phased Delivery of Infrastructure and Services [Modification Required]

- 2.21 Overall, the principles and approach that is proposed by **Strategic Policy SP08** are supported, as it is important that phased development proposals are appropriately co-ordinated and that there is positive planning for the wider comprehensive development of allocations where relevant.
- 2.22 In the context of the Council's plan, it is clear that **Strategic Policy SP08** will be directly relevant in the context of the planning and delivery of the Marcombe new community (**Strategic Policy WS01**). It will be important that this policy is able to work with and support the final version of the new community allocation policy, including relevant details for phasing, delivery and infrastructure provision.
- 2.23 The updated version of **Strategic Policy SP08** requires that where services are provided, they must include appropriate mechanisms for in perpetuity management and maintenance to a public body. It is assumed that on this basis "services" are expected to comprise utilities, such as water, sewage, electricity and telecommunications services, where it is important that networks are co-ordinated and comprehensive, and where generally these will be managed and operated by bodies that are publicly regulated (via relevant statutory regimes); however, as drafted, the plan is not clear on this point and it may be interpreted that this requirement might be applied to other "services" (such as the provision and management of public open space) where there is not usual or universal regime for public oversight. This should be clarified as part of **Strategic Policy SP08** (or the associated supporting text) for the sake of clarity and effectiveness. **Strategic Policy WS01** separately proposes that in respect of overall stewardship it is a requirement to "*establish a robust and sustainable new town-wide stewardship vehicle*", and it is essential that the requirements of **Strategic Policy SP08** are able to work consistently with this requirement.

Strategic Policy WS01: Development of Marlcombe new community east of Exeter [Modification Required]

- 2.24 Proposals to identify, allocate and develop a second new community within East Devon, as proposed by the plan and specifically **Policy WS01**, are strongly supported. As stated elsewhere and previously, there is very strong evidence to support the merits of providing for strategic scale development in the relatively unconstrained and strategically well located 'West End' of East Devon, to the East of the City of Exeter, and in close proximity to other regionally significant infrastructure and areas for growth.
- 2.25 Making this provision within the plan represents a very positive and pro-active approach by the Council as the proposed Marlcombe new community will be a long-term strategic development, that will need to be delivered over multiple plan periods.
- 2.26 Notwithstanding this there is a need for a clear focus on how and when development will be brought forward and the mechanisms and approach to allow for this, given that it is essential for housing, employment land (and supporting infrastructure and other uses) to be realised (as expected by the Council) during the plan period to 2042.
- 2.27 As set out in the introduction section to our representations, Bloor Homes and Stuart Partners have been collaboratively working, as part of landholder group, with Cherwell Group and LVA. The combined expertise of this group places the landholder group in very strong position to support EDDC in bringing forward the new community, including the delivery of employment in step with the delivery of homes, and social and community infrastructure in partnership with the Council. It is essential that the Council works positively with this group to deliver the shared objectives for the new community.

Vision for Marlcombe

- 2.28 Paragraph 4.6 of the Plan contains the "Vision" for Marlcombe, albeit this is referenced to reflect a vision which has been developed within, and repeated from, a separate technical assessment on options appraisal. Given the aspirational nature and scale of the Marlcombe development, the plan could more clearly and definitively state the Council's vision for the new community to help drive the delivery of this transformational development.
- 2.29 Previous comments we have made during earlier stages of the plan preparation (including informal briefings and workshops) suggested that the "vision" for this new place needs to be clear, succinct and set out what the unique aspects of this specific new development might be – rather than risk trying to prioritise everything. The vision for Marlcombe as stated in the supporting policy text remains lengthy and all-encompassing and this diminishes the opportunity and need to set out clearly what the critical vision is for the new place and how it will be distinctive and successful. To some extent it is considered that this carries over into the length and content of the policy (WS01), which we comment on further below.

Policy Structure and Format

- 2.30 At some 8 pages in length, there are concerns about the length of the allocation policy (WS01) and how this will provide an effective basis for the ongoing delivery of this significant development. Whilst recognising that, inevitably, a development of this scale

and significance may require a larger or more complex policy, than may be the case for other forms of development or other parts of the plan, there is scope for this to be adopted and improved.

- 2.31 In order to be effective, it should be kept in mind that plans and policies should be as focused, concise and accessible as possible, with site allocation policies (such as WS01) providing sufficient detail to provide clarity to developers/communities/interested parties about the nature and scale of development [that is expected or will be approved]. This is as set out in national planning guidance at Paragraph: 002 Reference ID: 61-002-20190315.
- 2.32 There is concern that Policy WS01 as drafted does not provide a sufficiently clear and concise policy to provide an effective framework for the future delivery of the new community, with similar matters and requirements duplicated within different parts of the policy, and significant detail provided (within text) where this may be best placed within reasoned justification, or could be contained within the additional strategies and documents required to support the implementation of the policy. Overall, there is significant scope to improve the effectiveness of the plan by making Policy WS01 shorter and more focused in its format and language to aid clarity on the essential aspects of the development for Marcombe and how these will be brought forward. We would encourage the Council to review this further as part of any modifications and the Examination process.

Principles of Allocation

- 2.33 As set out in previous representations and discussions with the Council during the preparation of the Local Plan, there is strong support for the selection of the new community location and the allocation of this strategic scale development in order to meet development needs within East Devon and this part of the wider County/Region. This includes the positive planning for (and allocation of) large scale development that looks beyond the plan period (over a timescale longer than 15 years), as is encouraged for new settlements by national policy (NPPF Para 22).

Scale

- 2.34 It is of concern that despite comprising an allocation for 8,000 homes (with employment and other uses), the policy continues to state that *“all planning and infrastructure capacity needs work for the new community should take into account accommodating greater levels of development, to accommodate at least 10,000 new homes and associated development”*. Whilst the potential expansion of the new community and the allocation to grow this, from (around) 8,000 new homes, to around 10,000 new homes, is a relatively clear future aspiration, it is not clear how the plan policy and any future development proposals can clearly do this where this is expressed to be “at least” 10,000 homes. National policy recognises that it may not be possible to fully identify all infrastructure requirements arising from new development of scale (such as a new settlement) at the outset and that requirements may need to be kept under review.
- 2.35 The proposed policy wording does not provide clarity around how and in what way the allocation development is expected to facilitate infrastructure capacity for the larger scale of development, and at what scale this might reasonably be (if it is in excess of 10,000). For example, EDU-13 identifies the need for a 2FE (420 place) Primary School,

which is to be delivered after 2042 and only to support the expansion of Marlcombe from 8,000 to 10,000 homes. On this basis there is no basis on which land or financial contributions could or should be sought from the 8,000 homes at Marlcombe which is being allocated in the plan.

- 2.36 There is also a lack of clarity in terms of how and in what way infrastructure planning and provision from the allocated 8,000 home development (and especially that to be provided in the plan period to 2042) can effectively account for any “over provision” which may be built in at the early stages to account for future expansion. Infrastructure requirements arising from the development need to be clear, directly related to the allocated development and proportionate, it may be that additional land may be reserved or safeguarded within the development, but this will need to be done in a way that is realistic and reasonable, with scope for more precise wording to clarify the scale of possible future growth that should be accounted for and how specific elements of infrastructure should provide excess capacity.

Masterplanning

- 2.37 It is stated that development should occur “*broadly in accordance with*” the masterplan that is now included for Marlcombe at Figure 7 within the plan, and on an agreed phased basis. There is no objection to this, in principle, as it provides a high-level expression of how the Council expects the allocation to come forward, but may be more effective to include that the development should occur “*broadly in accordance with **the principles of***” the masterplan – given its high level and diagrammatic nature. The plan should more clearly confirm the status of the masterplan at Figure 7, which is illustrative and where relevant the written policies of the plan would take precedence (noting our comments on the structure and format of the current policy, and that this could be set out and worded in a more concise way).
- 2.38 With respect to the phasing of the allocation development, which it is agreed will be necessary, this will be informed and guided by the allocation wide masterplan and associated Infrastructure Delivery Strategy, and it is essential that this is subject to input/agreement from/by relevant owners and developers within the development, who will be key stakeholders responsible for and able to facilitate delivery on the trajectory envisaged.

New Homes

- 2.39 The aspiration to see significant delivery of new homes at Marlcombe during the plan period is supported as this strategic development can make a significant contribution; however, the delivery trajectory provided as part of the evidence base¹ is ambitious and expects (requires) first housing completions at the new community in 2029/30 (144 homes). To achieve this, it will be essential that design, technical and work on planning applications (as well as planning applications themselves) are progressed in parallel with the examination and adoption of the plan. Whilst helpful as part of the evidence base, the plan should (given the scale and significance of Marlcombe) set out trajectory

¹ HOU-001(rev) – Housing Delivery Technical Report (Nov 2025)

illustrating the expected rate of housing delivery at the new community over the plan period (in accordance with the requirements of NPPF Paragraph 78).

- 2.40 In addition, and in recognition of the Council's ambitious delivery trajectory, whilst we are aware that the Council has ambitions to ultimately set up a Development Corporation to take forward, deliver parts of and manage the stewardship of the new community in long term, it is important to recognise the timescales required to put in place such Governance and ensure that such aspirations do not undermine the pace of delivery at Marlcombe, which is required to meet the Plan's trajectory expectations. Early applications can deliver important new homes, employment, physical, social and community infrastructure whilst not undermining the future Governance aspirations of the Council.
- 2.41 Finally, alternative models for development, including where the use of CPO may be required, are unlikely to achieve the scale and pace of development required by the plan and further early clarity on this remains important (irrespective of the outcome of and any decisions made concerning the government's new towns programme).

A – Affordable Housing

- 2.42 As reflected in our comments on Policy HN02 the policy basis for affordable housing at Marlcombe is not clear and not based on a robust assessment of development viability.
- 2.43 Whilst there may be aspirations for high levels of affordable housing (40%), the policy for Marlcombe needs to provide a requirement that is based on the viability and deliverability of such a requirement (tested in accordance with national planning practice guidance on viability), having regard to other infrastructure requirements for the development and a total obligations cost derived from a full and costed Infrastructure Delivery Plan (IDP) as well as any additional Community Infrastructure Levy (CIL) expectations. Currently, therefore, neither WS01 or HN02 accords with the NPPF which requires plans to set out the contributions that would be expected from development, including the levels and types of affordable housing, and that such policies should not undermine the deliverability of the plan.
- 2.44 Achieving 40% affordable housing on a strategic development of this scale will be challenging and the provision made for an "aspiration" for 40% is vague and will not be effective. Indeed, the Council itself recognises in earlier reports to its Strategic Planning Committee² that 40% affordable housing will not be achieved/viable without grant funding and the need for grant funding to achieve 40% affordable is also referenced in **Policy HN02**.
- 2.45 Currently, there is no evidence on what percentage of affordable housing **is viable without grant funding**. As part of the Council's evidence base (Ref. **NWC-005**), the Council has provided an Executive Summary of its Outline Business Case for Marlcombe – Phase 1. Paragraph 2.17 of that document confirms that CBRE, for the Council, has

² The Council's Strategic Planning Committee (30 September 2025), Report on Item 25 confirmed in respect of updated text for Polic WS01, that "*An aspiration for 40% affordable housing has been added to align with the aspiration of the governments New Towns Programme accepting that grant funding would be required to achieve this based on viability work to date.*"

undertaken viability appraisals for Marlcombe looking at 35% affordable housing, in line with other affordable policy requirements in the plan, and 20% which is suggested to be in line with proportion of affordable housing typical delivered from strategic development of this scale. None of that viability work has been provided as part of the Local Plan evidence base, nevertheless the percentages tested clearly imply that a 35% level of affordable would not be viable.

- 2.46 Clarity is required on the percentage of affordable housing that is viable without any grant funding, so there is a clear basis on which to secure viable and policy compliant affordable housing from future proposals. This will also provide clarity on the level of grant funding that will be required, which can only be beneficial when seeking to secure such funding. Appropriate obligations and mechanisms can then be embedded in future S106 legal agreements to secure the 'base level' of viable affordable homes in accordance with the policy, with provisions to seek grant funding if available to increase the percentage of affordable housing that can be delivered, with an aspiration for 40% delivery. The policy should set a clear and credible basis on which affordable housing will be sought from development at Marlcombe – base level' of.
- 2.47 Our clients reserve the right to comment further on the affordable housing aspects of Policy WS01 and HN02 once we have seen the completed viability work for Marlcombe, a full and complete IDP and clarity is provided on CIL expectations for the new community.

B – Housing Mix

- 2.48 It is agreed that development at Marlcombe could and should provide a mix of types and sizes of housing, based always on the market context in terms of the needs and demands for different scales and tenures.

C- Specialist Housing

- 2.49 It is not clear from the plan what the Council expects in respect of "*specialist housing to support younger vulnerable people*". It is assumed that this would be a form of hostel or other supported living provision to support (for example) young people leaving care or those with learning or other disabilities or needs, although it is not clear from the plan and it is not clear what type or scale of provision must be made, or how this might be provided (where this would not typically be something delivered or operated by a commercial housing developer). Further clarity is required in terms of the scale and type of provision expected by this part of the policy and how it is expected to be delivered (this could be within supporting text and reasoned justification).

D – Density

- 2.50 In respect of residential density for the new community development, **Policy WS01** currently expects an average density of at least 45dph. As part of the further detail and evidence for the new community policy to be progressed this needs further review in line with the masterplan and viability work, to ensure that an appropriate average is being set, as part of range of densities that will be required to reflect the typologies expected in the market for this location and as part of a new community within Devon. As part of this work, there must be recognition of the wider Policy DS01 'Design and local distinctiveness' requirement for all new development to be locally distinct as well as recognition that the Vision for Marlcombe expects "design that will draw inspiration

from the local context". The Vision also expects development to *"be sensitively and seamlessly integrated with the rolling landscape of the Clyst Valley"* and there needs to be recognition of the particular topographical character of the site which, whilst proving the basis for a distinct and high-quality community, will impact on the ability to deliver at high density across the allocation as a whole.

- 2.51 Overall, whilst some higher densities, including apartment typologies will be possible in and around centres (at or around the 55-60dph suggested in the draft policy) or along key transport routes and nodes, predominantly this development will reflect the prevailing context and market for development in this location. An average density that is less than 45dph may be most appropriate and this requires further critical review.
- 2.52 On this basis, greater flexibility should be introduced into **Policy WS01** and the policy should be changed to state that an average density of around 45dph will be sought, with potential that a slightly lower density may be optimal when having regard to the characteristics and topography of the site, and the need to deliver locally distinctive forms of the development.
- 2.53 The ability to achieve higher density housing of 55-60 dph, or up to 75dph within and around the town centre, will require the use of mixed use blocks and apartments above commercial uses.

Gypsy and Traveller Provision

- 2.54 **Policy WS01** proposes that the new community development should make provision for gypsy and traveller pitches both during the plan period and beyond, and that this provision is to be brought forward in line with "bricks and motor" housing development and integrated within the new community. The specific evidence to support the inclusion of pitches as part of the new community development (rather than any other locations, including on land controlled by the Council or the County Council) is not currently available and should be provided in order to support this proposed requirement, together with evidence to support why/how this provision would be successful as part of the new community, rather than in other specific locations that could be identified by the Council. At this stage there is no evidence to support the inclusion of pitches as part of the new community and so there is an objection to this element of the policy, which requires further consideration and amendment.

Jobs

- 2.55 With respect to the provision of jobs, the draft plan states that a range of employment provision will be accommodated to meet the needs of business as they develop and grown. Serviced or other land/premises is expected to be made available for occupation on a phased basis that is proportionate to housing occupations. The logic for this is clear but overlooks that, in this case, there is significant interest in and potential for large format employment development to come forward early in the trajectory for this development, and potentially in advance of housing completions. The plan and **Policy WS01** should be amended to make more positive provision for this, such that land at and around Hill Barton Business Park can contribute to the expanded provision for employment land and premises early in the plan period (and irrespective of any housing

delivery occurring first or in parallel), where this would help enhance and not prejudice the wider delivery of the new community development. This is a benefit of the site allocation area that has been selected and should be properly reflected in the final version of the plan/policy, which should free up the potential for employment land delivery and not require it is only phased with the wider new community development.

Town and Neighbourhood Centres

- 2.56 There is no specific objection to this element of the policy given that there is a requirement for suitable centres as an integral part of the new community development. As noted elsewhere there are a range of facilities and uses that are suggested to be provided as part of the new community that would likely benefit from a Town and Local Centre location and so the plan would benefit from clarity about the expectations for now and where these facilities/uses are to be provided, and that they can form part of the overall area for centres required by the policy.
- 2.57 To support the Town and Local Centres, a clear delivery strategy for this element of the development will be necessary, including flexibility which will support and enable the facilitation of these centres (and associated uses) within early phases. This will need to have regard to how and when active uses may be brought forward, where some delivery will depend on the market and how quickly (or otherwise) new built space or land is taken up by operators/users (so as to be operational). Bloor Homes would be keen to further discuss and explore how the Council's delivery model for the new community can be targeted specifically to support the phased delivery of development within the centres, where there may be good potential for joint working or the involvement of an enabling third-party developer to take forward this element on serviced land. The potential for the Council (or its future delivery partners or future Governance organisation) to take long term land interests in the Town or Local Centres would further support the Council's aspirations for long term stewardship, with the opportunity for any commercial returns to be reinvested in the Marlbombe Community.

Social, Cultural, Leisure, Health and Community Facilities

- 2.58 It is agreed that there will be a need for the delivery of, and provision for, a range of social, cultural, leisure and other facilities as part of the new community. These elements need to be clearly defined (where they can be and where specific provision is being prescribed as essential for delivery by policy) or require flexibility to enable provision to be made in a responsive way, as the needs and demands within the new community are established and/or evolve over time.
- 2.59 The updated version of the draft policy (WS01) now specifically identifies that development will be required to make revenue as well as infrastructure contributions towards the delivery of services to support the growth of the new community. Whilst the provision of infrastructure (either directly or via the provision or in-kind or financial contributions to cover the capital costs of infrastructure provision) is well established practice, it is unusual that development should be asked to provide revenue contributions to support the ongoing delivery of services that are provided and funded via other mechanisms, other than possibly funding for some level of ongoing management and maintenance. Where the Council considers that planning obligations

will be necessary to secure revenue contributions from development, it will be necessary for great care to be taken to ensure that these obligations (contributions) meet the relevant statutory tests (in terms of being necessary, fair and reasonable) and will need to fully be defined and accounted for in viability testing.

- 2.60 In respect of Marlcombe, the only reference to revenue funding within the IDP (published as part of the consultation) is with respect to a “Community Builder” to be support the growth of the community (promoting social interaction and the leading of healthy lives). If this is essential and the only service that is expected to be covered by revenue contributions then the wording of the policy could clarify this, so that there is no ambiguity for implementation or viability testing. The role of any “Community Builder” and how this is to be funded and managed would need to also have regard to the stewardship and governance strategy for the new community as there are likely to be direct interactions and interrelationships between the two.

Education Facilities

- 2.61 It is agreed that there will be a need for the delivery of new education facilities as part of the new community development at Marlcombe. If the education infrastructure planned for the new community is to provide for a wider area (in order to meet the needs of the plan), as is stated by the policy wording then any oversizing needs to be fully accounted for as part of the overall viability assessment and Infrastructure Delivery Strategy.
- 2.62 It is agreed that the “*precise timing and mechanism for the delivery of the schools*” at Marlcombe, should be further established and defined through phasing and infrastructure delivery strategies, however there is significant concern that the policy prescribes that facilities at the education campus will be delivered first. Without further clarity over phasing and overall infrastructure delivery, which will need to be developed as part of the implementation of Policy WS01, there is no certainty that education facilities located at the main Education Campus will best serve the needs of the development in the early phases. This is on the basis that a delivery strategy that commences with residential development within both the Northern and Southern areas of the allocation would be logical, with strong potential that residential development on the Bloor Homes land in the Northern part of the site accessed from the A30 would provide the best potential to meet the Council’s trajectory for Marlcombe. Should this be the case then it would be effective that new Primary School provision were made in this part of the site (to the North), at an appropriate time, to serve the new residents in this area, with initial phases of development also utilising existing off-site capacity for at least Secondary education provision in the early stages of the new communities development (noting the flexibility and choice that is inherent in the way in which pupils choose school’s that they attend).
- 2.63 The above approach would also reflect relevant advice and guidance provided by the Department for Education³ [“DfE”] with respect to strategic sites and new settlements, where early delivery of a school (or schools) can be problematic if preceding new housing, as this risks unacceptably low pupil numbers or drawing pupils from existing

³ DfE - Securing developer contributions for education, August 2023

schools (and embed potentially unsustainable transport patterns). On this basis it is most likely that some form of new Primary School provision at the site will be the first to be delivered (where this is generally required to serve lower numbers of dwellings and at smaller scale), with new Secondary School provision being made only later in the process (potentially after the completion of many hundreds or thousands of new homes) given the scale required to support the opening of a new school. This suggests the need for a flexible approach with locations for new Primary education provision dictated by the masterplan and phasing strategy and not being essential only at the main Education Campus.

- 2.64 The main Education Campus is to be (based on the Marcombe Masterplan, Figure 7) located more centrally within the site, and will require new road infrastructure to support this and may not be well connected to other areas of the allocation site during the early years of the development (including residential areas to the North). A strategy to provide phased connections will be required, but it is not essential (or likely effective) that the Education Campus must provide the "first" education facilities within the new community. This aspect of the policy requires amendment.

Wider Infrastructure

A – SANG

- 2.65 There is a clear need for SANG as part of the comprehensive strategy for the delivery of the new community at Marcombe, in order to provide mitigation for potential effects that may arise from recreational pressure on protected sites elsewhere in East Devon.
- 2.66 The design and delivery of SANG will need to be progressed on a comprehensive basis, with phased delivery to account for the scale and timescales associated with the proposed development, with SANG provision broadly in step with the provision of new housing, but with potential that some specific parcels of land may over or under provide, depending on their contribution to the overall requirements for the scheme as a whole.
- 2.67 There is good potential that some SANG may be provided as part of the wider aspirations and policy for the Clyst Valley Regional Park ["CVRP"], on land which is outside of, but adjoining or close to the land allocated for the Marcombe new community. This approach may help to ensure that the development capacity within the allocated area of the new community development can be maximised, as part of providing a more compact and efficient form of development, whilst utilising other nearby and connected land for necessary SANG provision (where it is most beneficial to do so).

B – Education Uses

- 2.68 As noted above we agree that the timely delivery of sufficient education infrastructure is necessary to support the new community, although the level and type of provision should be fully accounted for as part of viability work (especially where this is to serve the wider area beyond the allocation) and it is not essential (and will hinder delivery) if the Education Campus must be the first new facilities to be delivered on the site. It is highly likely that a new Primary School would be the first provision to be needed and delivered and this may be best located other than within the Education Campus (depending on the phasing and infrastructure delivery strategy which is to be agreed).

C – Public Open Space

- 2.69 It is agreed that a variety of open space should be provide as part of the new community, as part of a multifunctional green infrastructure network across the new community, providing links within the development and to the wider networks within the surrounding area.

D – Playing Pitches

- 2.70 It remains the case that the Council’s updated Playing Pitch strategy is being prepared and has not been available/published to support the preparation of the plan (and this consultation).
- 2.71 On this basis the specific requirement for 20ha of playing pitches (with this area to include associated buildings and other facilities) is not clear, and nor is this related clearly to an overall strategy for outdoor sports provision that will also make use of facilities that may be made available as part of the Education Campus, and/or investment and improvement/expansion in the other sports clubs and facilities that already exist in the area surrounding the new community, such as Exeter Athletic RFC. As drafted, there is not agreement on the quantity and location of the playing pitches as shown within the illustrative masterplan (Figure 7).
- 2.72 Absent this evidence this element of the policy is currently not justified and there will be a need for further supporting information/evidence and/or modification of this element of the policy to defer the specific quantum of sports pitch provision to be made to the Infrastructure Delivery Strategy (or another aspect of the supporting documentation that will support the delivery of Marcombe).

E – Cemetery

- 2.73 Whilst additional cemetery provision (land for a cemetery) may be required to serve a new development of this scale, further details should be provided to justify the requirement for and inclusion of this specific scale of cemetery land and the role function it is to provide (including any associated buildings, or other facilities that may be expected, by the community and/or cemetery operators).
- 2.74 The policy as drafted lacks clarity about the type, location and size of facility that is required and what services/functions it may include (or would be expected). The IDP published alongside the consultation suggests that the provision to be made will account for development at Marcombe during the plan period and beyond it; it is not clear if this means that the 1ha proposed will cater for all 8,000 being allocated now by WS01, or would also account for growth to or beyond 10,000 dwellings.

F – Place of Worship and Parsonage

- 2.75 Whilst there may be a need for an additional Place of Worship in a development of this scale, or at least that there may be additional local demand for this provision to be made, further details should be provided to justify the requirement for this, having regard to the type, location and scale of other existing places of worship within the area, and the specific justification for a new facility as part of the new community development.
- 2.76 It is assumed that any new place of Worship to be provided as part of the development may be best located within either the Town Centre of one of the Local Centres to be provided, in which case the specific demand for this facility (if it were to arise) could be

facilitated via the provision for a suitable range of mixed/flexible uses within these centres, rather than a policy requirement that demands the provision of a new Place of Worship (where specific need/demand has not been evidenced, as is currently the case).

- 2.77 As drafted the policy also requires a Parsonage, this implies that the Place of Worship may be for a specific religious or faith group, whereas the Place of Worship may (if justified) require a different form of accommodation (for a religious or faith leader), other than a Parsonage. On this basis this policy wording should be revisited, if there is evidence/justification for inclusion within the allocation policy, which there is not currently.

G – Recycling and Waste Transfer

- 2.78 Policy WS01 requires at least 4.05ha of land for a Materials Reclamation/Waste Transfer Station. This is a very specific amount of land, and it is not clear how or why this scale of facility has been identified.
- 2.79 The IDP published with the consultation also identifies that, although development across East Devon will increase the amount of recycled materials requiring processing, and that a new facility is needed, the future location of this facility remains to be confirmed, and that land is to be reserved at Marlcombe via WS01. A location within Marlcombe may not be the most suitable and so the policy should only seek to safeguard the land in or around Marlcombe, until such time as it is identified to be needed in this location or not (at which point the safeguarded land can be released for other purposes).
- 2.80 The provision of this land, where the infrastructure is required to serve wider development needs in the West and End and East Devon generally, should be fully accounted for as part of the viability assessment for Marlcombe and the associated cost apportioned on a suitable pro-rated basis.

H – Park and Ride

- 2.81 In principle, the use of Park and Ride (P&R) as a complementary part of the overall Transport Vision for Marlcombe is accepted, with the potential for this to intercept existing trips, help create network headroom and support early public transport provision.
- 2.82 Bloor Homes and Stuart Partners support, in principle, the investigation of the merits of a P&R site adjacent to the A30 where this is shown to be beneficial to the overall sustainable transport strategy and highways infrastructure mitigation strategy for Marlcombe. On that basis, Bloor Homes has, through its initial masterplanning work, included the potential for P&R site within its land control adjacent to the A30 – that approach accords with the Council's current concept masterplan.
- 2.83 However, there is an ongoing need for review of how P&R assumptions are applied to Transport Assessment for Marlcombe and the evidence that underpins the P&R strategy and need, especially for the northern P&R facility served off the A30 Airport Junction to be considerate of the capacity and mitigation considerations in this location, given the role of this junction as a primary all modes access to Marlcombe.

I - Electricity Infrastructure

- 2.84 There may be a need for additional electricity infrastructure to serve the development but there is no detail or evidence to confirm why 1ha of serviced land is the minimum area that may be required, and nothing to indicate what additional area may be required where the wording of the policy suggests that “*at least*” this area will need to be provided.
- 2.85 The IDP that supports the consultation clarifies that there will be a need for a new Bulk Supply Point, in order to serve both Marcombe, as well as wider developments across the West End and further afield. No specific location has been identified for this facility. Whilst land could be reserved as part of the Marcombe development, this infrastructure is to be brought forward by National Grid Energy Distribution (as the Distribution Network Operator, working in collaboration with the NESO). A location within Marcombe may not be the most suitable for this and so the policy should only seek to safeguard the land until such time as it is identified to be needed in this location or not. The provision of this land, where the infrastructure is required to serve wider development needs in the West and End and East Devon generally, must be fully accounted for as part of the viability assessment for Marcombe and the associated cost apportioned on a suitable pro-rated basis.

J – Leisure Centre

- 2.86 It is agreed that leisure provision will be an important component of the new community; however, further details should be provided to justify the type, location and size of Leisure Centre facility that is required and what services/facilities it is to provide.
- 2.87 This use is one that it is likely would be best located within the Town Centre, adjacent to it or adjacent to the Education Campus. Clarity in the policy or supporting text around what is required for this facility is necessary so that it can be accounted for fully in respect of master planning and viability work. Whilst the IDP published with the consultation suggests that further detail is being prepared, this is currently not available.

K Neighbourhood Health Centre

- 2.88 Whilst it is agreed that some form of local health provision is likely to be required at Marcombe further details should be provided to justify the type, location and size of facility that is required and what services/functions it is to serve.
- 2.89 This use is one that it is likely would be best located within the Town Centre or a Local Centre and so could be integrated into policy that seeks to provide a range of uses within these areas of the site (absent specific detail over the type and scale of facility that may be required). Further details and justification are required to support this element of the policy.

L – Blue Light Facility

- 2.90 Further details should be provided to justify the requirement for and inclusion of a “Blue Light Facility”, the policy as drafted lacks clarity about the type, location and size of facility that is required and what services/functions it is to serve.
- 2.91 The different types of facility that could be required, may have very different scale and spatial requirements. Further details and associated justification are needed to support this element of the policy. No further detail is available in the IDP to help identify the

type and scale of facility that is required and the associated spatial requirements and/or costs.

M – Public Transport

- 2.92 It is agreed that the provision of new and extended Public Transport services and infrastructure will be important to support Marlcombe. This provision should be subject to need and viability considerations, in terms of the requirements to help support commercial services, as part of the holistic Transport Vision for the new community.

N – Walking, Wheeling and Cycling Infrastructure

- 2.93 It is agreed that provision for new walking, wheeling and cycling infrastructure will be important within and to content the new community to the wider area. Further clarity on the detail and strategy for this provision should be developed as part of the detail for the implementation of the new community development.

O – Off-site Highway Improvements

- 2.94 It is agreed that there will likely be a need for a range of off-site highway improvements to facilitate and mitigate the impacts of the new community development. These provisions are likely to be significant in terms of both cost and programme for delivery and the plan could and should do more to clarify what is required.
- 2.95 There are various Transport Projects that are listed within the IDP published as part of the consultation (including works to increase capacity at J29 and J30 of the M5, Junction improvements at the A30 Airport Roundabout junction, and Sidmouth Road corridor enhancements) which together are costed at some £90million. If these measures are known and expected, then to be consistent with other parts of Policy WS01 then they could be referenced into this part of the policy.
- 2.96 The full package of expected highway improvements and transport projects must be fully accounted for as part of the viability assessment for Marlcombe and the associated cost apportioned on a suitable pro-rated basis.

P – Mobility Hubs

- 2.97 It is agreed that the provision of mobility hubs may be necessary and something that will support the overall Transport Vision and strategy for the new community.

Masterplan, Infrastructure Delivery Strategy, Phasing Strategy and Financial Appraisal

- 2.98 **Policy WS01** states that:

“Proposals to develop land within the new community of Marlcombe must progress in accordance with an allocation-wide masterplan, Infrastructure Delivery Strategy (to accord with the IDP produced by the Council), Phasing Strategy and Financial Appraisal which will have been submitted to and approved by the local planning authority prior to commencement of any development”.

- 2.99 As noted above there should be clarity that the development at Marlcombe should accord with the “principles” contained within the Marlcombe Masterplan that is included within the plan (Figure 7), and should be clarified to be illustrative/indicative

only, where there will be a need for significant evolution of this in order to provide a technically and financially viable for of development.

2.100 There has already been some collaboration between the main landholder parties at Marlcombe on masterplanning matters and this is expected to continue. There is expected to be a need to consider the following matters in terms of how the Marlcombe masterplan evolves/is finalised:

- The alignment of the Primary Access Road;
- The location of the Educational Campus, as the current location has topographical challenges and will likely lead to greater abnormal costs which might not be necessary if the campus were delivered on other more level parts of the allocation area;
- The scale, extent and type of employment development within the North West of the allocation area, due to topography in this area, with the potential that this might be better used for other uses, and any lost employment area re-provided on available land around Hill Barton;
- The potential benefits arising from an additional (secondary) access from the A3052 in the South (East of Hill Barton Business Park) in order to directly facilitate early delivery of employment in this location (and potentially at a greater quantum), and provide further linkages into the new community and between the intended sports hub and the new community (if retained here) – the overall approach to sports/pitches and SANG in this area can be reviewed, with the potential to locate the hub in a more optimal location in the heart of the community. Overall, such changes would be on the basis of no intended loss/reduction of the SANG and sports elements/requirements, subject to our earlier comments on the Council's playing pitches evidence base with possible to review the arrangements for the Sports Hub; and
- The strategy and approach for Wastewater Treatment and the inclusion of package plants within the allocation area.

2.101 Within the plan there should be some further clarity provided (likely as part of supporting text and reasoned justification) around the expectations for how these key documents will be prepared, submitted to and approved by the Council. It is not clear if the Council expects that it will prepare these documents, or if other parties, including owners and developers of land within the site will be expected to do so. There is already collaborative work taking place between the main parties (the landholder group) who control land at Marlcombe, and this is expected to continue.

2.102 The Financial Appraisal required at this part of the policy may be the one exception to this, as it is not clear what type of Financial Appraisal could or should be provided by the owners or developers of land within the allocation, unless there was a need to show that development proposals were not viably able to support all relevant infrastructure requirements being set by the plan. It is necessary that the Council prepares and comprehensive and robust assessment of financial viability to support the allocation but,

to date this has not yet been published, and is subject to further comment as part of our submissions in respect of Policy HN02 on affordable housing. Once the viability appraisal, prepared in accordance with national planning policy guidance has examined and found to be sound, there should not normally be any need for any further Financial Appraisal. This aspect of the policy is, therefore, unnecessary.

- 2.103 Whilst it is clear that development of land within the allocation should accord with an agreed Phasing and Infrastructure Delivery Strategy, including timing triggers which link the provision of new infrastructure to the delivery and occupation of new homes (as well as other forms of development), it is less clear how development can and should be judged in terms of possible prejudice to the future integration of additional development at the new community, where the scale and location of this development is not known, and where this would be for allocation as part of a future plan making process. This element of the policy wording should be revisited to refer instead to “*clear and substantial prejudice*” (or similar) and should there be specific aspects of infrastructure provision of possible conflict that is of concern then this could/should be identified as part of the policy or supporting text.

Delivery Model and CPO

- 2.104 At previous stages of the plan and as part of the ongoing preparation of the supporting evidence, it is understood that the Council has been considering the most appropriate future delivery model for the new community and how development is to be effectively delivered to meet the requirements set by the plan.
- 2.105 However, as drafted **Policy WS01** does not specify or imply anything other than a traditional model of delivery for the new community development (with reference to the delivery of the new community development by landowners and developers), and this would be strongly supported as the most effective and appropriate way for this new community to take place.
- 2.106 There are a number of key parties (and owners) involved in the promotion of the new community development, and there will be (via the provisions suggested as part of the emerging policy) appropriate mechanisms for collaboration and co-ordination, without the need for the creation (for example) of a New Town Development Corporation. Whilst we are aware that the Council has ambitions to ultimately set up a Development Corporation to take forward, deliver parts of and manage the stewardship of the new community in long term, it is important to recognise the timescales required to put in place such Governance and ensure that such aspirations do not undermine the pace of delivery at Marlbcombe, which is required to meet the Plan’s trajectory expectations. Early applications can deliver important new homes, employment, physical, social and community infrastructure whilst not undermining the future Governance aspirations of the Council.
- 2.107 Collaboration and co-ordination is already taking place between the main promoters/developers/owners within the allocation area with work having been jointly commissioned to look in further detail at the engineering associated with the main roads and routes through the proposed allocation area, masterplanning and other aspects of co-ordination that will be necessary in order for the successful implementation of the development. The main parties have also been progressing discussions on the form and

content of a collaboration agreement, which will help to define and guide joint working between them (alongside working with the Council and other stakeholders) in order to effectively progress the ambitious expectations for delivery the quality and pace of delivery of development at Marlcombe.

2.108 **Policy WS01** states that *“In appropriate cases the Council, another government or public sector body or relevant landowners/developers may forward-fund and bring forward delivery of a specific item or items of infrastructure that is required for this allocation in the Infrastructure Delivery Plan IDP and compulsory purchase powers may be used in order to deliver such items of infrastructure if required.”*

2.109 It is noted that the Council (or other government or public sector bodies) may consider the use of compulsory purchase powers in order to progress delivery of infrastructure. Whilst the option may need to be kept open for the Council, it is not considered that this will be necessary for most (or all) of the new community development, where a traditional model of delivery can be effectively used (guided by the documents required as part of **Policy WS01**) and where there may be potential for land to be made available to the Council (or other bodies) in order that the Council (or other bodies) take control over the delivery of parts of the scheme, such as schools, other community infrastructure, or the town/district centres as a whole. Further detail and evidence around these elements should be provided as part of the ongoing work on the Masterplan, Phasing Strategy, and Infrastructure Delivery Strategy for the new community. Should land at Marlcombe be acquired or accessed (e.g. via license) by the public sector as part of a future delivery model, to deliver key infrastructure (including social and community infrastructure – such as education), then this will need to clearly be justified on the basis of removing barriers to development, reducing the need to control (and helping to release) the delivery of housing, via onerous or restrictive triggers linked to infrastructure delivery.

2.110 **Policy WS01** states that:

“Development proposals within the new community allocation (or benefitting from the infrastructure provided as part of the new community allocation) will be expected to contribute towards the infrastructure required by this allocation on a pooled and, where applicable, on a retrospective basis (i.e. a contribution will still be required, even where the infrastructure has already been built and/or fully or partially funded, including through forward-funding to ensure a fair and consistent apportionment of infrastructure costs across the new community).”

2.111 Whilst there is no issue with the pooling of contributions to enable proportionate contributions to be made and this would be expected as usual practice, it is unusual and impractical for contributions or other obligations to sought on a wholly retrospective basis (especially if fully funded or even delivered), unless agreed in advance as part of a roof-tax mechanism that enables the full package of infrastructure that is essential for the new community to be delivered. Further clarification on the approach that is expected to apply could be provided in supporting text to the policy.

Stewardship

2.112 **Strategic Policy WS01** requires that a robust and sustainable stewardship vehicle and governance is put in place early in the planning and delivery process. This is to be

informed by a Stewardship Strategy being prepared by the Council. It is agreed that a Stewardship Strategy is required and this is something that should be developed for the new community at Marlcombe in partnership and relevant stakeholders. It is not clear from the policy what type or form of stewardship this element of the policy is intended to support, either via a new public authority (such as a new Town Council) for the new community (in place of, or via the reorganisation of existing Parish Council's for the new community area), or more traditional arrangements for oversight via the District and County Councils, with the use of Management Companies for the ongoing management and maintenance of some communal areas and assets. The policy could and should be more specific about expectations around this aspect of the development, or detailed should be provided as part of supporting text.

Policy Justification and Transport Vision

- 2.113 Whilst some limited policy justification has been provided from Paragraph 4.7 there is potentially a role for far more supporting text and additional detail that could be provided as part of the reasoned justification for **Strategic Policy WS01** and to support a more streamlined and focused (concise) version of the policy.
- 2.114 The majority of the supporting justification that is now included in the Plan (from 4.8b onward) is concerned with the separate Marlcombe Transport Vision. Separate comments on this Transport Vision have been provided within a note from Belvedere Consulting, and which is appended to this response as **Appendix 1**.
- 2.115 The comments provided on the Transport Vision set out that, given the scale, phasing and strategic importance of Marlcombe, the Vision and other supporting evidence would benefit from greater clarity on how vision-led principles are translated into the assessment approach underpinning modelling, particularly in relation to trip distribution, assignment and the assessment of impacts at key junctions. In summary this includes:
- Clarity in respect of journey purpose assumptions;
 - The approach to the localisation of trips within the wider West End;
 - Connectivity to existing education and employment uses during early phases of development, including connectivity across the A30;
 - The role of Park and Ride within the transport strategy and interaction with localisation;
 - The role, phasing and functional expectations for mobility hubs;
 - Flexibility within the assessment framework; and
 - The role and function of the Spine Road.

Strategic Policy WS01 - Summary

- Proposals to identify, allocate and develop a second new community within East Devon, as proposed by the plan and specifically Policy WS01, are strongly supported, as there is very strong evidence to support the merits of providing for strategic scale development in the relatively unconstrained and strategically well located 'West End' of East Devon.

- Bloor Homes and Stuart Partners have been collaboratively working, as part of landholder group, with Cherwell Group and LVA. The combined expertise of this group places the landholder group in very strong position to support EDDC in bringing forward the new community, including the delivery of employment in step with the delivery of homes, and social and community infrastructure in partnership with the Council.
- There is concern that Policy WS01 as drafted does not provide a sufficiently clear and concise policy to provide an effective framework for the future delivery of the new community. There is significant scope to improve the effectiveness of the plan by making Policy WS01 shorter and more focused in its format and language to aid clarity on the essential aspects of the development for Marlcombe and how these will be brought forward. We would encourage the Council to review this further as part of any modifications and the Examination process.
- The proposed policy wording does not provide clarity around how and in what way the allocation development is expected to facilitate infrastructure capacity for a future larger scale of development, and at what scale this might reasonably be (if it is in excess of 10,000).
- With respect to the phasing of the allocation development, which it is agreed will be necessary, this will be informed and guided by the allocation wide masterplan and associated Infrastructure Delivery Strategy, and it is essential that this is subject to input/agreement from/by relevant owners and developers within the development, who will be key stakeholders responsible for and able to facilitate delivery on the trajectory envisaged.
- The aspiration to see significant delivery of new homes at Marlcombe during the plan period is supported as this strategic development can make a significant contribution; however, the delivery trajectory provided as part of the evidence base is ambitious and expects (requires) first housing completions at the new community in 2029/30 (144 homes). To achieve this, it will be essential that design, technical and work on planning applications (as well as planning applications themselves) are progressed in parallel with the examination and adoption of the plan.
- Achieving 40% affordable housing on a strategic development of this scale will be challenging and the provision made for an “aspiration” for 40% is vague and will not be effective. Whilst the ‘aspiration’ for achieving 40% affordable housing might remain, a clear understanding of a viable ‘baseline’ affordable housing percentage is required, with clear policy explanatory text which confirms that 40% affordable is subject to securing the necessary grant funding.
- There are a number of further clarifications and amendments that are required to Strategic Policy WS01 especially in respect of the type and scale of infrastructure to be provide, and how this will be achieved, as set out within our detailed comments on these matters – this includes the fact that the full package of expected highway improvements and transport projects must be fully accounted for as part of the viability assessment for Marlcombe (with the associated cost

apportioned on a suitable pro-rated basis), and that the approach to affordable housing provision requires further clarification and amendment.

Strategic Policy WS09: Clyst Valley Regional Park [Modification Required]

- 2.116 Whilst the principles of extending the extent of the proposed Regional Park, as suggested via **Strategic Policy WS09**, are supported, including integration alongside the Marlcombe new community development, it is premature to define the detailed (extended) boundaries for this (as shown on the policies map).
- 2.117 This is primarily on the basis that it is unclear how the detailed Regional Park boundary takes account of the **Strategic Policy WS01** requirement that the new community will need to accommodate at least 10,000 new homes overall. To allow for capacity beyond the 8,000 dwellings being allocated by **Strategic Policy WS01** in this plan, significant additional areas of land will be required, around and adjacent to the Marlcombe new community allocation.
- 2.118 This additional land requirement is very likely to impact on land being identified now as part of the Regional Park, via **Strategic Policy WS09**. In particular this includes land immediately adjoining the proposed new community boundary to the East, on land previously promoted to be part of the new community development area, and in advance of any further masterplanning or site selection to understand how the new community may be expanded in the future (the most likely areas to accommodate the additional capacity required by **Strategic Policy WS01**).
- 2.119 This aspect of the plan needs to be kept under review, and it is most likely that further identification and allocation of land for the Regional Park to the East of the Marlcombe new community could/should be deferred for a further future review and future plan making process.

Strategic Policy CC05: Heat Networks [Modification Required]

- 2.120 **Strategic Policy CC05** promotes the use and expansion of heat networks, and requires that within 1km of any existing network, connection to that network should be provided (for major developments). Very large developments (which will include the Marlcombe new community) will be required to provide their own network, unless this is technically not achievable or significantly undermines commercial viability.
- 2.121 **Strategic Policy CC05** should be more flexibly worded to only prescribe that the feasibility and viability of a new network should be investigated (as part of bringing forward larger development proposals) and recognise that this may not present the best solution including instances where technically not achievable, where a network may have significant adverse effects for viability and/or a heat network is not an optimum environmental solution in terms of alignment with local and national policy for the transition to net-zero. Amendments are required to **Strategic Policy CC05** on this basis.

Strategic Policy HN01: Housing to address needs [Modification Required]

- 2.122 **Policy HN01** seeks to provide an “appropriate mix” of homes across East Devon during the plan period. Whilst this aspiration is supported overall, as drafted the policy is not clear and will not be effective, as the way in which the mix for developments will be prescribed, assessed or controlled is not clear.
- 2.123 If it is intended that the provisions of the mix suggested by Parts A-E will be derived via other policies of the plan (including where relevant site allocations) then this should be clearly stated, with other aspects of housing mix (for the open market element of standard major housing proposals) having regard to available evidence of need, but fundamentally information available to developers in respect of local housing demand and supply, where those delivering housing are best able to assess the types of housing that are appropriate at different sites and different stages of phased developments.
- 2.124 As drafted **Policy HN01** is not clear, nor justified and should be deleted or modified to ensure that it is effective.

Strategic Policy HN02: Affordable housing [Object]

- 2.125 It is agreed that relevant affordable housing provisions should be made within the plan as part of supporting communities across East Devon and to meet needs arising during the plan period.
- 2.126 In respect of the second new community (as at Strategic **Policy WS01**), it is essential that the policy provision for this component of the plan is subject to robust viability testing, undertaken in accordance with national planning practice guidance, and which has full regard to the final infrastructure requirements for the development and a total obligations cost derived from a full and costed IDP as well as any additional CIL expectations.
- 2.127 Currently the plan and the published evidence base on viability for the wider plan⁴ includes no specific, detailed and robust assessment of development viability at Marcombe which would support the 40% level of affordable housing that is being targeted, or otherwise shows what minimum level (or range of levels) of affordable housing may be appropriate. This is a fundamental matter for the plan to address as part of its modification and examination. Affordable housing at this level is most unlikely to be supported by development without very significant grant funding, especially where there are other significant infrastructure demands that arise from the delivery of a new community.
- 2.128 Whilst Policy HN02 also recognises that the aspired 40% will not be achieved without grant funding, there is currently no clarity on what percentage of affordable housing is viable without such funding. The policy should set a clear and credible basis on which affordable housing will be sought from development at Marcombe – an ‘aspiration’ for achieving 40% affordable housing might remain, however, a clear understanding of a viable ‘baseline level’ of affordable housing percentage is required.
- 2.129 Whilst the Council, or its consultants, have not yet completed the ‘bespoke viability’ for Marcombe, there does need to be a level of consistency with the Council’s evidence base on viability for the wider plan. For example, the Benchmark Land Value [“BLV”] to be used is a significant component of any viability assessment, alongside robust and realistic costs and values to identify any surplus or deficit that may arise. The viability assessment that is provided is based on an approach to land value that considers an Existing Use Value [“EUV”] and scenarios for either a 10, 15 or 20 uplift in this (to reflect development value) to set an appropriate BLV (or range of BLVs)–. This resultant range of BLVs is between £210,00 and £420,000/ha. In addition, in respect of the Cranbrook Development Plan Document (adopted just over 3 years ago in October 2022) there was considerable discussion on the approach to viability for that plan, and that development (which is currently being developed in very close proximity to Marcombe. That plan set a BLV of £300,000/ha. We would expect any viability testing that is bespoke to Marcombe to take a similar approach to ensure consistency with the policy approach across the plan area. This is the approach which is required for viability at the plan

⁴ **CSD-004** – East Devon Local Plan Viability Assessment, Jan 2025 and **CSD-004a** – East Devon Local Plan Viability Assessment Addendum (Nov 2025)

making stage and is as set out in the national guidance on viability which requires (amongst other things):

- Plan makers to create realistic and deliverable policies;
- Policy requirements, particularly for affordable housing, to be set at levels that takes into account both affordable housing and infrastructure needs (without the need for further viability assessment at the decision-making stage); and
- Undertaking site specific viability assessments for sites that are critical to delivering the strategic priorities of the plan.

2.130 There are significant affordable housing needs in East Devon, but also very significant infrastructure requirements to support the new community development at Marcombe. Robust viability assessment at the plan making stage and this needs to be provided urgently to support a realistic and deliverable policy for the provision of a baseline level of affordable housing at Marcombe, recognising that this can be improved in circumstances where significant grant or other funding becomes available to do so.

2.131 To complement the approach being taken by **Policy HN02** it would be useful if the policy or the supporting text (associated with this policy) clarified the level of affordable housing provision which is being targeted via the plan as a whole (and its associated policies) and how this is meeting the evidenced levels of need arising via the Council's Local Housing Needs Assessment (HOU-002).

2.132 Elsewhere in the plan (at Paragraph 3.10) it is stated that the affordable housing target for the plan is some 4,400 new affordable homes; however this is significantly short of the stated need (from HOU-002) at around 8,000 affordable homes or around 400 new affordable homes per year.

2.133 The plan as drafted is unlikely to be making provision to meet all of this level of need via **Policy HN02** and other mechanisms for affordable housing delivery. This points to the plan needing to provide for higher levels of housing growth overall, consistent with the objective stated elsewhere to "*maximise the delivery of affordable housing across East Devon*" and this should be reviewed further by the Council.

Strategic Policy HN04: Accessible and adaptable Housing [Modification Required]

- 2.134 **Policy HN04** requires that at least 50% of all dwellings meet at least building regulation M4(2) requirements, and that at least 15% of all new affordable housing meets M4(3)(2)(a or b). The supporting text provided at 8.12 onwards references the findings of the East Devon Local Housing Needs Assessment 2025 (HOU-002(rev)) as providing the justification for these requirements, primarily due to East Devon's ageing population with specific needs.
- 2.135 As identified within the plan the standards being sought by **Policy HN04** seek to reflect the national approach to optional technical housing standards, which Local Planning Authorities can set (within Local Plan policies), so long as there is the need for additional standards in their area and having regard to viability.
- 2.136 An ageing population is relatively common across the UK and it is not clear what specific justification exists within East Devon for the imposition of this optional standard, especially at the high level that is stated. Where national standards are set, via the building regulations, for all housing then this provides the most appropriate and consistently clear basis on which to ensure that appropriate standards in respect of accessibility and other aspects are being met. This is highlighted by the need for the Council's draft policy to reference any "replacement standards" noting that these nationally imposed components of the buildings regulations are liable (and likely) to change during the plan period, meaning that the policy may become outdated as regulations/standards continue to evolve.
- 2.137 It also remains unclear how the Council's viability assessment has fully and robustly assessed the additional costs associated with this provision (especially the significant provision associated with the M4(3) a or b standard (which is not clearly fixed by the policy as drafted) and built that into the modelling of all development typologies.

Policy HN05: Self-build and custom build housing [Object]

- 2.138 There is not sufficient evidence to support the Council's approach to **Policy HN05** and it needs to be deleted or substantially modified. By providing 5% of new dwellings on all developments over 20 homes as self or custom build housing, the policy would be seeking to deliver far more self and custom build homes than evidence suggests is needed. The Council's self-build and custom build monitoring information (identified at footnotes 61 and 62 within the plan and documents HOU-015 and HOU-017) shows only around 240 entries for people interested in self and custom build housing options. This is significantly less than the level of provision that would be secured from the 5% requirement being suggested by **Policy HN05**.
- 2.139 Rather than a blanket approach to self and custom build provision as part of all larger residential developments, the plan should be taking a more refined approach to identifying those sites that are most suitable to the types of self and custom build homes that are attractive and valuable for those interested in this provision, including projects that would be attractive to Community Led Housing Groups, Community Land Trusts and Cohousing groups (as identified in the supporting text at 8.21 of the plan).
- 2.140 There is no evidence to show that the generic approach being proposed by **Policy HN05** would meet the needs of those interested in self and custom housebuilding options, either in respect of the total quantum, or the types of sites (plots) that may be made available.
- 2.141 If there is intended to be provision as part of larger strategic development sites (which often results in limited take up), then this can often only be meaningful achieved via the provision of "shell homes" following a 'custom build' model, where future occupiers have the option to significantly influence the internal layout and fitout of these buildings including the way in which internal works are procured and progressed. Other options for fully self-build plots often result in significant phasing, completion, infrastructure and health and safety issues, where the timing and rate of construction is not able to be controlled alongside the build out of the other parts of the development.
- 2.142 In all cases where self or custom homes or plots are secured as part of any planning permission, then there should always be 'cascade' mechanisms included to ensure that these homes/plots can revert to standard models of provision after an appropriate marketing period (not more than 12 months).
- 2.143 As drafted **Policy HN05** is not sound as it is not supported by appropriate robust evidence and is not justified. If the policy is to be retained then it should be substantially modified to better reflect evidenced levels of need in East Devon for self and custom build housing, and how this can be provided in a way that meaningfully contributes to meeting those needs, and not adversely impacting on the capacity and delivery of all major housing sites.

Strategic Policy DS01: Design and local distinctiveness [Comment]

- 2.144 The updated version of **Policy DS01** has now deleted the additional reference to locally described space standards. This change addresses our previous objections to this policy. It remains the case that the requirement for all new housing development to comply with the Nationally Described Space Standards needs to be accounted for as part of the viability assessment for the overall plan and policy requirements being set.

Policy DS02: Housing density and efficient use of land [Modification Required]

- 2.145 The updated version of **Policy DS02** has amended wording in respect of the approach to density, which clarifies that, when seeking to maximise the delivery of housing (and so density), this should be done in a way which is compatible with the setting and characteristics of any specific site. This change addresses our previous objections to this aspect of the policy, although other concerns remain in respect of the requirement for design codes.
- 2.146 As drafted **Policy DS02** is not justified and will not be effective. Not all development schemes of 50 dwellings or more would require the production of a design code, as is stated by the policy. The plan does not, either via the policy or the supporting text, provide justification for the requirements that are contained within the policy.
- 2.147 There are many instances where developments of this scale would not require a design code to be produced in order to be granted planning permission (such schemes may be proposed via full planning application which enable the Council to fully assess the detailed design of the development).
- 2.148 Whilst the intent of **Policy DS02** around density and the efficient use of land is supported, the detail around design codes is poorly constructed and won't be effective. Alternative policy provision should be made around the use of Design Codes if this is necessary to support the implementation of the plan as a whole, where there should be greater clarity about how design codes are to be used and the types and scales of development that are relevant (a blanket requirement for codes on all residential developments of more than 50 dwellings is not justified). The plan should also clarify the Council's intentions in respect of District wide design codes that it will produce in order to support the policies in the plan (there is no clarity on this point currently within the text that supports **Policy DS02**, although there are references to the intention for a District Design Guide linked to **Policy DS01**).

Policy TR05: Aerodrome safeguarded areas and Public Safety Zones [Support]

2.149 It appears that the “*aerodrome safeguarded areas*” referenced in the policy are now shown on the policies map, this change addresses our previous objections to this policy.

Policy OL05: Green wedges [Modification Required]

- 2.150 **Policy OL05** specifies that within the defined green wedges development will generally not be permitted. The green wedge designation on land to the East of the M5 and South of the A30 is retained from the previous Local Plan within the new Local Plan, although this designation now overlaps in part with the allocation proposed for the Marlcombe new community (via **Strategic Policy WS01**) – this area is shown in the extract at Figure 1 below.
- 2.151 The detail of the green wedge policy, and/or the allocation, is not sufficiently clear to resolve this inherent conflict between these two policy provisions and this should be amended to ensure clarity and the effectiveness of the plan.
- 2.152 The Marlcombe Masterplan which is now Figure 7 within the Local Plan shows employment development in this area, this would be fundamentally inconsistent with the extent of the Green Wedge and the policy approach of **Policy OL05**.
- 2.153 There will be a range of Green Infrastructure provided as part of the new community development, as part of a comprehensive and co-ordinated masterplan and the inclusion of this area as part of the Green Wedge is not necessary. Amendment is required, to remove this part of the Green Wedge designation (where it overlaps with the WS01 allocation) as the policy as drafted and shown on the policies map is not justified or effective and so is not sound.



Figure 1 - EDDC Interactive policies map extract

Strategic Policy PB05: Biodiversity Net Gain [Object]

- 2.154 The proposed policy requirement for all major development proposals to deliver Biodiversity Net Gain ["BNG"] of at least 20%, as per **Policy PB05**, is fundamentally inconsistent with the national approach on this matter as set out within National Planning Policy, Guidance and Legislation. There is no compelling evidence to support the need for East Devon to target gains at this elevated level where development proposals would otherwise be mandated to demonstrate and secure measurable net gain for biodiversity at the level of at least 10%. There may be instances where additional gains can be achieved, but this should not be set as a requirement for all major developments, and there will be other ways that the District Council is able to pursue its aims in respect of nature recovery (in a way that is complementary to and in parallel with the controls that are imposed on new major development projects).
- 2.155 Planning Practice Guidance is very clear and states (at Paragraph: 006 Reference ID: 74-006-20240214) that:
- "Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development."*
- 2.156 The Council has provided no compelling or thorough justification to support a policy requirement that seeks a higher percentage than the statutory minimum of at least 10% (either in respect of need, opportunity or viability impacts) and so this policy is fundamentally unsound.
- 2.157 Whilst it is acknowledged and positive that development can and should make contributions to addressing biodiversity decline and nature recovery (as is required by national policy) the Council has not produced compelling evidence of need that is specific to East Devon and justifies the proposed policy requirement. The need to contribute at least 10% BNG via new major development proposals is established via the statutory BNG framework and there is not any need to go further via the policies in this Local Plan.
- 2.158 The viability impacts of providing elevated minimum levels of BNG have also not been robustly assessed, where the higher costs (stated as 19% within the Council's Viability Assessment) to achieve 20% BNG will have a significant impact on the viability and delivery of development sites across East Devon (including the key site allocations within the plan on which the Council relies to meeting housing and other development needs). As noted within the Council's assessment the ability to deliver high levels of BNG, and also the potential for additional costs arising, are site specific *"depending on both the existing site characteristics and the ability of development form to both mitigate and provide additional gain"*, with the conclusion that it is therefore *"difficult to gauge a suitable allowance for meeting the requirements"*.
- 2.159 Not only is it clear that the possible cost and viability impacts of this policy have not been robustly assessed (so as to be shown to be soundly based and compatible with the plan as a whole), it is not clear how the policy requirement has been considered and tested

as part of the process of identifying the various development site allocations that form a fundamental component of the plan. Given that at this stage there is not detailed baseline assessment available of all of these sites, the land or other requirements to achieve this policy, whilst meeting the capacity expectations for development from these sites is far from clear. It is possible that in many cases requirement to provide at least 20% BNG on an allocated development site would have the effect of either significantly reducing the capacity for development (where this requirement is being met on site), or an off-site solution is proposed (via an offsetting solution and the use of credits) an additional financial cost that puts further pressure on the timely delivery of development and the provision of other planning obligations.

- 2.160 Given the above **Policy PB05** should be significantly modified to ensure that it is sound. This is primarily on the basis that a requirement for at least 20% BNG is not justified in terms of being necessary, viable and in terms of the impact it may have on how the plan will secure other sustainable development objectives. As part of any modification to **Policy PB05** there should also be a further critical review to ensure that any elements of the policy that may remain, only do so on the basis that they complement rather than duplicate the statutory framework for BNG. Beyond the headline objective of seeking an elevated level of minimum BNG, much of Policy PB05 is unnecessary as it duplicates aspects of the statutory regime for BNG and matters that would be covered through the submission, approval and implementation of Biodiversity Gain Plans (linked to relevant planning permissions).
- 2.161 Unmodified **Policy PB05** would have a significant impact on the potential for East Devon to deliver the development requirements and other policy objectives set in the plan. The statutory framework now exists to ensure that all qualifying new developments make a meaningful contribution to address nature recovery goals by contributing at least 10% BNG. The Council can do more to go further, including encouraging higher levels of BNG where this is both feasible and viable, but this should not be linked to major development proposals via Development Plan policy in the way suggested by this policy.

Policy PB07: Ecological enhancement and biodiversity in the built environment
[Modification Required]

- 2.162 There are two parts of **Policy PB07** which are of concern as drafted and should be modified or deleted to ensure that the policy is justified, effective and sound.
- 2.163 Part C of the policy requires that all major planning application should provide an integrated bat loft, if ecologically relevant. The basis for this policy (to require one integrated bat loft on any size major development, from two houses on a site area over 0.5ha or 1,000s of new homes proposed as a major development, seems to be irrational and not clearly justified. There is also a lack of clarity around how, where and why this feature might be considered to be "*ecologically relevant*". The potential delivery implications of this feature, including ongoing management/maintenance (and enforcement of this), does not seem to have been considered as part of devising the policy wording. It would seem preferable to omit this element and use Part B in order to secure appropriate features for the use of bats within new development. This part of the policy could even possibly be strengthened to prescribe the rate at which new bat box provision should be made.
- 2.164 Part E of the policy requires that all major developments should provide overhanging eaves suitable for nesting house martins. This requirement provides no flexibility and assumes that all developments (or all scales and typologies) will be able to provide this feature and that it would be architecturally appropriate to do so. This will not always be the case and so the requirement needs to be omitted as it is not justified. In any event the provision of integrated bird boxes is dealt with by Part A of the policy.

Policy PB09: Monitoring requirements for new planting schemes [Support]

- 2.165 The updated version of **Policy PB09** has now deleted the requirement for a financial bond to be in place during the period for the implementation and initial maintenance of new planting schemes. This change addresses our previous objections to this policy.

Appendix 1: Belvedere Consulting – Technical Note (16th January 2026)

Technical Note

Project: Marlcombe - Land East of Exeter

Date: 16 January 2026

Client: Bloor Homes Exeter

Subject: Representations - Marlcombe Transport Vision

Job No:25022

Rev: V2

1 General Approach and Scope of Representations

- 1.1 These representations are submitted at Regulation 19 stage on behalf of Bloor Homes in respect of the emerging Marlcombe allocation. They focus specifically on matters relating to the Stantec Transport Vision and its role within the wider evidence base supporting the Plan. The comments set out below are intended to be constructive and proportionate, and seek to ensure that the Transport Vision clearly and transparently translates its stated principles into the assumptions that will underpin future transport assessment and modelling. They do not seek to revisit the overarching spatial or place-making vision for Marlcombe, nor to comment on detailed scheme design, but instead focus on the robustness, clarity and effectiveness of the Transport Vision at this strategic stage.
- 1.2 The respondent supports the ambition and overall direction of the Marlcombe Transport Vision and welcomes the clear intent to deliver a genuinely vision-led approach to movement, consistent with national policy and emerging best practice for large new settlements.
- 1.3 The Respondent welcomes the additional narrative and appendix-level clarification provided in the updated version of the Vision in relation to:
- journey purpose,
 - internalisation,
 - modal split assumptions, and
 - the use of nationally recognised data sources.
- 1.4 In particular, the emphasis on the following is supported in principle:
- early internalisation of trips,
 - provision of education, employment and services alongside housing delivery,
 - high-quality public transport and active travel, and
 - integration with the wider West End of East Devon.

- 1.5 However, given the scale, phasing and strategic importance of Marlcombe, the Respondent considers that the Transport Vision and its supporting evidence would benefit from greater clarity on how vision-led principles are translated into the assessment approach underpinning modelling, particularly in relation to trip distribution, assignment and the assessment of impacts at key junctions.

2 Relationship between the East Devon Vision and the Transport Vision

- 2.1 It is recognised that the East Devon District Council Vision for Marlcombe established the overarching place-making and policy aspirations for the new settlement, including objectives relating to self-sufficiency, 20-minute neighbourhoods, early infrastructure delivery and a strong emphasis on sustainable travel.
- 2.2 The Stantec Transport Vision performs a different, complementary role. It forms part of the technical evidence base and is relied upon to translate these strategic aspirations into transport assumptions, assessment methodologies and infrastructure requirements.
- 2.3 The comments set out in this Technical Note are therefore directed at ensuring the Transport Vision clearly and transparently reflects the principles of the East Devon Vision within the assessment approach that underpins modelling and impact testing, rather than seeking to revisit or challenge the overarching vision for the site.

3 Journey Purpose: Recognition versus Assessment Application

- 3.1 The updated Transport Vision clearly recognises that:
- travel behaviour varies by journey purpose and time of day, and
 - different trip purposes will exhibit different levels of internalisation and modal choice.
- 3.2 This is explicitly set out within the Transport Vision and its Trip Rate Appendix, which explains that trip purposes vary by time period and that different purposes have different levels of internalisation (for example, education trips are more likely to internalise, whereas holiday trips are typically external).
- 3.3 However, it remains unclear how this differentiation is operationalised beyond trip generation, and carried through into the trip distribution and assignment methodology underpinning the assessment of impacts on the surrounding highway network.
- 3.4 In particular:
- journey purpose differentiation appears to inform the narrative and headline assumptions of the Vision; and
 - it is not clearly demonstrated how different journey purposes are treated spatially within trip distribution and assignment, especially where trips are external to Marlcombe.

Relevance to the Transport Vision

3.5 For a mixed-use settlement explicitly designed to internalise a high proportion of non-work trips, reliance on broad or generic spatial distribution assumptions risks:

- overstating trip lengths;
- overstating flows on strategic corridors; and
- overstating impacts at sensitive junctions.

Requested clarification

3.6 The Vision (or its supporting evidence) should explicitly confirm that:

- trip generation assumptions are carried through into journey-purpose-specific trip distribution and assignment;
- internalisation assumptions are purpose-specific; and
- the assessment approach is capable of reflecting these differences transparently.

4 Localisation of Trips within the Wider West End

4.1 While the Transport Vision places strong emphasis on internalisation within Marlcombe itself and interception of longer-distance trips to Exeter via Park and Ride, it also identifies the proximity of significant employment and service destinations within the wider West End.

4.2 However, there remains limited clarity on how trip distribution and assignment will explicitly reflect this localisation within the assessment approach.

4.3 This is notwithstanding the proximity of:

- major employment areas (including the Airport, Skypark, Science Park and Sowton);
- nearby residential communities such as Cranbrook and the eastern Exeter fringe; and
- a growing network of education, retail and service destinations.

Relevance to the Transport Vision

4.4 Many trips generated by Marlcombe will not logically be Exeter city-centre-bound. Failure to test the potential for localisation within the West End risks:

- assigning trips to longer routes than necessary,
- increasing loads on constrained strategic junctions, and

- under-representing the benefits of place-based planning.

Requested clarification

4.5 The Vision should more explicitly:

- recognise inter-settlement localisation within the West End as a core component of the strategy;
- confirm that trip distribution reflects nearby employment and service destinations, not only Exeter, and
- ensure this potential is tested within the assessment approach.

5 Early Phase Connectivity to Existing Education and Employment Uses

- 5.1 The Transport Vision places strong emphasis on early internalisation of trips, early habit formation and the delivery of education, employment and services alongside housing. These principles are central to achieving the Vision's objectives around sustainable travel behaviour and reduced car dependency.
- 5.2 In practice, the detailed phasing and sequencing of residential development alongside employment, education and services will continue to be refined as masterplanning and delivery progress. During the early phases, travel patterns are therefore likely to reflect a combination of on-site opportunities as they come forward and connections to existing destinations within the surrounding area.
- 5.3 In the context of early phases of development, there is also an opportunity to take advantage of Marcombe's proximity to existing employment and education destinations within the wider West End, including areas to the north of the A30 such as Skypark, the Science Park and the Airport.
- 5.4 Where early phases of development come forward in the northern part of the site, the delivery of connections to these destinations as part of the wider movement network would help support early localisation of trips, complementing the Vision's internalisation strategy rather than replacing it.

Relevance to the Transport Vision

- 5.5 Ensuring that early phases of Marcombe benefit from effective connectivity to existing employment and education uses would strengthen the alignment between the Vision's stated objectives and early-phase outcomes, help manage demand on strategic corridors, and support more realistic assumptions around trip distribution and assignment in the early years of development.

Requested Clarification

5.6 The Vision should:

- explicitly recognise the role of existing employment areas to the north of the A30 in supporting early-phase trip localisation;
- confirm that, where early phases come forward in the northern part of the site, there is an opportunity for those phases to benefit from strong, sustainable connections to these destinations; and
- support the early delivery of enabling connections to existing employment and education uses, where appropriate, as part of the wider movement network.

6 Park and Ride: Role, Scope and Interaction with Localisation

- 6.1 Bloor Homes supports, in principle, the investigation of the merits of a Park and Ride facility adjacent to the A30 where this is demonstrated to be beneficial to the overall sustainable transport strategy and highways mitigation strategy for Marcombe. On that basis, and through its initial masterplanning work, Bloor has made provision for a potential Park and Ride site within land under its control adjacent to the A30, an approach which aligns with the Council's current concept masterplan for the site.
- 6.2 However, while the principle of Park and Ride is supported, further clarity would be beneficial in relation to its intended role, scale and application within the Transport Vision, particularly in how Park and Ride assumptions are embedded within the transport assessment and used to inform the evaluation of junction impacts.
- 6.3 In this context, while the Transport Vision sets out a clear suite of principles and assumptions in relation to Park and Ride, it does not clearly articulate how these are translated into the assessment approach that underpins modelling and the evaluation of junction impacts.

Relevance to the Transport Vision

- 6.4 Without clearer explanation of how Park & Ride assumptions are applied within the assessment (by journey purpose and phase), there is a risk that:
- park and Ride benefits are assumed across all journey purposes,
 - its interaction with internalisation and West End localisation is unclear, and
 - junction performance becomes unduly sensitive to fixed uptake assumptions.
- 6.5 In addition, further clarity would be beneficial in relation to the evidence underpinning the proposed Park and Ride strategy, including how it relates to the capacity and utilisation of existing Park and Ride or Park and Change facilities serving Exeter from elsewhere on the strategic road network, and whether alternative or complementary interception approaches have been considered.

- 6.6 The interaction between the proposed northern Park and Ride facility and the A30 Airport junction would also benefit from further clarification, particularly in relation to capacity and mitigation considerations, given the role of this junction as a primary all-mode access to Marlcombe. Clarifying how Park and Ride interception interacts with capacity and mitigation at this location would strengthen confidence in the robustness and deliverability of the strategy.

Requested clarification

- 6.7 The Vision should:
- clarify which journey purposes Park and Ride is primarily intended to serve (e.g. commuting);
 - explain how Park and Ride interacts with the wider localisation strategy;
 - clarify how the proposed Park and Ride strategy relates to existing interception facilities and alternative approaches; and
 - clarify how Park and Ride assumptions are applied and tested within the assessment, including the extent to which these are varied as part of sensitivity testing.

7 Mobility Hubs: Role, Phasing and Functional Expectations

- 7.1 The Transport Vision appropriately identifies mobility hubs as a key component of the sustainable movement strategy for Marlcombe, supporting mode shift, shared mobility and reduced car dependence.
- 7.2 However, where mobility hubs underpin assumptions relating to internalisation, mode choice and reduced car use, greater clarity would be beneficial in relation to:
- the anticipated phasing of initial hub delivery relative to early occupations;
 - the minimum specification (by hub type) and delivery triggers required to ensure hubs function as intended from first occupation; and
 - how reliance on mobility hubs is reflected within the assessment approach.
 - how the mobility hub strategy integrates with the wider network and how EDDC and ECC intend to manage and deliver these facilities.
- 7.3 Providing this clarity at the Vision stage would strengthen the robustness and effectiveness of the strategy without precluding flexibility in detailed design.

8 Flexibility of the Assessment Framework

8.1 The updated Vision refers to the strategy remaining 'live' and adaptable over time, recognising long-term phasing and evolving behaviour.

8.2 However, flexibility is described in terms of:

- governance arrangements; and
- behavioural change over time,

rather than within the assessment approach underpinning modelling itself.

Relevance to the Transport Vision

8.3 For a long-term, phased new settlement, the ability to:

- refine trip distribution by journey purpose and destination,
- reassess assumptions as land uses come forward, and
- respond proportionately to observed impacts,

is essential to effective delivery.

Requested clarifications

8.4 The Plan should confirm that:

- the assessment underpinning modelling allows for refinement over time;
- alternative scenarios (including varying levels of internalisation and localisation) can be tested; and
- mitigation responds to observed performance rather than a single fixed forecast.

9 Internal Spine Road: Role, Continuity and Network Function

9.1 The Transport Vision refers to a primary internal movement corridor through Marlcombe, intended to support access, internal circulation and sustainable movement.

9.2 However, while the Transport Vision promotes filtered permeability (including the use of modal filters), it is not clearly confirmed how this principle applies to the primary internal movement corridor — i.e. whether it is intended to operate as a continuous through-route for general traffic, or whether continuity will be managed or constrained through design, filtering, or mode-priority measures.

9.3 This distinction has material implications for trip distribution, route choice and the assessment of impacts at key junctions.

- 9.4 It is recognised that the highway authority is undertaking a range of scenario tests as part of the assessment process in order to understand the sensitivity of network performance to different assumptions and layouts. This is welcomed and reflects the strategic importance of Marlcombe and the need for a robust evidence base.
- 9.5 However, the need for multiple scenario tests also highlights the importance of the Transport Vision providing clear guidance on the intended movement principles that underpin those scenarios.

Relevance to the Transport Vision

- 9.6 Whether the internal spine functions as a continuous through-route, or a place-led corridor with controlled permeability, will materially influence:
- the extent to which trips are attracted through the site;
 - the loading of external junctions and strategic corridors; and
 - the realism of assumptions relating to internalisation and localisation.
- 9.7 Without clarity on this principle, there is a risk that assessment assumptions either over or under-state traffic impacts, and that the Vision's intent is not consistently reflected in the evidence base.
- 9.8 This does not require detailed design to be fixed at this stage but would provide important clarity on the assumptions underpinning the Vision and its assessment.
- 9.9 Overall however, there is a risk that unfettered access along this corridor could undermine the internalisation assumptions, and therefore any potential strategic traffic benefit of a continuous link should be carefully tested against the Vision's objectives around internalisation and sustainable travel.

10 Early Delivery of High-Quality Pedestrian and Cycle Connectivity across the A30

- 10.1 The Transport Vision identifies the importance of providing strategic pedestrian and cycle connections across the A30 to link Marlcombe with surrounding communities and destinations, including Cranbrook and employment areas to the north.
- 10.2 Such connections form part of the wider active travel network envisaged for Marlcombe and are likely to be required as part of the overall movement strategy for the site, irrespective of development phasing.
- 10.3 Where early phases of development come forward in the northern part of the site, there is an opportunity for high-quality pedestrian and cycle connections across the A30 to be delivered earlier as part of the wider network. Bringing forward such connections would align well with the Vision's objectives around early habit formation, sustainable travel and trip localisation, while also supporting realistic assumptions within the transport assessment.

Relevance to the Transport Vision

- 10.4 Providing high-quality pedestrian and cycle connectivity across the A30 would support the Vision's objectives by encouraging early uptake of sustainable modes, reducing reliance on longer-distance vehicular trips, and reinforcing the role of active travel as an integral part of the site's movement framework.

Requested clarification

- 10.5 The Vision should:
- clarify the role of pedestrian and cycle crossings of the A30 within the wider movement network;
 - explain how the delivery of high-quality A30 crossings is intended to align with development phasing; and
 - confirm how such connections are reflected within the assumptions underpinning the transport assessment.

11 Soundness

- 11.1 Notwithstanding the additional clarification provided in the updated Vision, the Respondent considers that without the clarifications set out above, the Transport Vision remains at risk of being insufficiently justified in terms of how its principles are translated into assessment.
- 11.2 With relatively modest clarification and strengthening, the Vision would:
- be more robust,
 - provide greater certainty for delivery, and
 - better support Marlcombe's role as a sustainable new settlement within the West End.

12 Summary and Requested Actions

- 12.1 The Respondent requests that the Council:
1. clarifies how journey-purpose differentiation is embedded in trip generation, distribution and assignment;
 2. explicitly recognises and assesses localisation of trips within the wider West End;
 3. explicitly recognise the importance of early-phase connectivity to existing education and employment destinations (including those north of the A30), and ensure that this principle is reflected in assumptions relating to early trip localisation and distribution;
 4. provides clearer justification for how Park and Ride assumptions are applied by journey purpose and phase;

5. confirms sufficient flexibility in the assessment approach to reflect phasing and evolving behaviour;
6. clarifying the role and function of the internal spine road through the site between the A30 and A3052;
and
7. prioritises early delivery of high-quality pedestrian and cycle connectivity across the A30.