



East Devon Local Plan
Publication Stage (Regulation 19
Stage 2) Representation Form

Ref:

**(For official
use only)**

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

Please return to East Devon District Council, Local Plans Team, Blackdown House, Border Road, Honiton, EX14 1EJ, upload onto our consultation portal at:

<https://eastdevonlocalplansecondreg19.commonplace.is>

or email: localplan@eastdevon.gov.uk by **26th January 2026**

Part B – Representation

Please use a separate sheet for each representation

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

Paragraph

5.5 to 5.6

Policy

SD03

Policies Map

1(b). Does your comment relate to one of the changes made to the first Regulation 19 plan?

Yes

No

Please note if you responded to the first regulation 19 consultation in early 2025, those representations remain valid and will be submitted to the Planning Inspector. **Do not resubmit previous comments.** Only make new representations if you are commenting on the specific changes listed in the Schedule of Changes, or if you did not respond to the first consultation.

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

Site Ref

Honi_01 and Honi_15

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

Yes

No

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

(Continue on a separate sheet if necessary)

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

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

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

Yes No

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

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

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

Land at Heathfield Manor (previously Honi_01 and Honi_15)

We set out in previous representations made on the initial Regulation 19 Plan the inconsistencies, errors and failures of the site selection process that led to the Heathfield Manor site not being appropriately considered or assessed in respect of its suitability for supporting housing growth at Honiton. This meant that a site, previously identified partly as a draft allocation (Honi_01) in the Plan and initially supported by officers as an extended site (Honi_15) within the published recommended sites for the Regulation 19 Plan (before the report was withdrawn and replaced just prior to the meeting), was left out of the Plan without any justification.

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

- The site (Honi_01) was included in the Regulation 18 Plan as a draft allocation;
- The HELAA did not identify any inherent constraint, whilst acknowledging it's location within the National Landscape;
- The site was considered achievable and deliverable within the first 5 years of the Plan;
- Wider scheme (Honi_15) promoted at further Regulation 18 stage with masterplan submitted;
- Supported by officers and recommended for inclusion at Regulation 19 Site Selection process and included in Site Selection Report to be reported to Strategic Planning Committee (SPC);
- This report was withdrawn after publication a few days before the SPC meeting and advised that it would be given further consideration;
- Information presented to the SPC meeting was inaccurate and Members did not appear to understand what they were considering (Honi_01 or Honi_15); and
- Members did not take forward Honi_01 or Honi_15 in the Regulation 19 Plan, despite Honi_01 being previously a draft allocation.

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

Furthermore, it is noted that the Council has published a topic paper alongside the Part 2 Regulation 19 Plan consultation which considers major development in National Landscapes and seeks to justify the sites to be included within the Plan where these are within or adjacent to the National Landscape. Honi_15 is referred to as a rejected site and dismissed as an alternative on the basis that there would be significant landscape impacts. This is contrary to the evidence previously provided in support of the site and the Council's previous position in respect of its part draft allocation and the initial support from officers.

The topic paper provides no further evidence of a comparative assessment between those sites included in the Plan within the National Landscape and our clients' site. The paper then further justifies the inclusion of the other sites on the basis that the purposes of the National Landscape to conserve and enhance its natural beauty could be advanced through careful design, landscape retention and reinforcement, materials and scale. All matters relevant to Honi_015 and demonstrated through the submission of masterplanning work.

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

No reference is made to this masterplanning work that has been submitted to the Council for Honi_15, despite similar framework design work being used to justify inclusion for other sites in the National Landscape. This again flags the inconsistency of approach to site selection and the absence of clear and robust evidence that underpins it.

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

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

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

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

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

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

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

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

Land west of Hayne Lane (Gitti 03,04 and 05)

Our clients remain concerned that the allocation of this site was based primarily on quantum and an assumed capacity rather than a consideration of relevant matters in respect of deliverability. It also a site that is distant from the core facilities of the

town and accessibility during the site selection process was described as challenging. Part of the site also falls within the National Landscape, demonstrating that this does not appear to be the principle for ruling out sites as suggested in the context of Heathfield Manor.

The additional wording added to the policy, relating to the need to maximise opportunities to conserve and enhance the natural beauty of the site and wider national landscape setting, could equally apply to Heathfield Manor (which has already been demonstrated through the masterplanning and technical work undertaken).

The revised wording of the allocation doesn't address the previous deliverability concerns we have expressed in terms of access challenges and landscape and heritage sensitivities alongside the need for the site to come forward in a masterplan dealing with the site comprehensively and the provision of significant infrastructure. This points to a site that will take some time to come forward. It is therefore unlikely to make a significant contribution to housing delivery in the early parts of the Plan period.

On that basis it is clearly a more sustainable strategy to deliver a range of sites (including Heathfield Manor) which provide good access and connectivity options to existing services and facilities whilst offering opportunities for enhancement of existing infrastructure and landscape setting to support the growth of the town. This will also be more beneficial in ensuring the Plan is resilient in meeting housing needs at an early stage of the Plan period.

Land adjacent to St Michaels Church and south east Cuckoo Down Lane (Honi 07 & 12)

We previously made the point that, as with Heathfield Manor, these sites lie within the National Landscape but are closer to heritage assets and represent a less logical extension to the urban area in respect of form. Therefore, the allocation is inconsistent with the decision to not allocate Heathfield Manor. We also raised the point that Honi_12 was not recommended to be allocated by officers.

We note the Part 2 Regulation 19 consultation version of the Plan now excludes Honi_12 and reduces the capacity of housing provision from 101 to 30 homes which appears to emphasise that the clear constraints of the site were not fully realised or considered at the site selection process. It again suggests that the opportunity to maximise quantum on a few larger sites without full consideration of delivery factors was placed above identifying a range of more deliverable sites.

Land south of Northcote Hill (GH/ED/39a and b)

This concern is further advanced by the revised capacity now included in the Plan for Northcote Hill, rising from 200 homes to now 310 homes. This is despite the revised policy text clearly indicating that impacts of scale and other matters on the National Landscape will require further consideration at a later stage. It further sets requirements for which there is no evidence put forward to demonstrate that the increased housing numbers could meet.

The updated site selection report does not address the rationale regarding the increased quantum of housing now to be delivered on the sites, and it is therefore unclear what further assessment has been undertaken to justify this increase. The report also does not address the previous concerns raised by my clients and others regarding the challenges of these sites. In particular the access and accessibility challenges with access constrained by narrow roads under railway bridges which will require significant

improvements. Whilst the revised policy wording now refers to these challenges, the need to “maximise opportunities for localised improvements and contributions to enhance sustainable travel modes” rather underplays the extent of the issue.

Our concern is that any increase in capacity of these sites is not only unevidenced but may be simply a case of trying to redress the loss of numbers in Honiton as a result of the removal of Honi_12. This would be inappropriate and does not take into account the delivery challenges of the site or the likely impact delays in bringing sites forward will have on the Plan strategy as a whole. A more sustainable approach would have been to re-consider sites previously omitted (such as Heathfield Manor).

We continue to consider that there are no good reasons for the Plan not to allocate the Heathfield Manor site. It is a site that is relatively unconstrained nor overburdened by infrastructure requirements. The site can come forward quickly to support delivery in the earlier stages of the Plan period and provide much needed resilience to the Plan’s strategy. Without having a range of sites within Honiton the Plan will over rely on more constrained sites which are more difficult to bring forward, particularly given the significant uncertainties around deliverability

3 (c). Please set out the modification(s) you consider necessary to make this part of the East Devon Local Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the East Devon Local Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

We believe further growth at Honiton should be provided for through the allocation of further sites. This will underpin the Plan’s strategy to ensure sufficient housing growth in the town throughout the Plan period, including at an early stage. The site at Heathfield Manor is unconstrained and has previously been identified as a preferred choice site based on its suitability. There are no impediments to its delivery and as such it can make an important contribution to the Plan.

Policy SD03 should therefore be modified to include land at Heathfield Manor (Honi_15) as an allocation.

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

Yes No

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

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

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

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

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

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

(Continue on a separate sheet if necessary)

To elaborate further on these and previous representations made on the Plan, including providing evidence to support the necessary Modification of the Plan.

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

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<https://www.commonplace.is/privacy-policy>

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.

(Continue on a separate sheet if necessary)

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

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