

Filtered Data Export

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Waddeton Park Ltd

Proposal:

1. Introduction

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

Paragraph

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

1.1

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

2(b). If no, please give details of why you consider this part of the Introduction chapter is not legally compliant. Please be as precise as possible.: Bell Cornwell LLP on behalf of Waddeton Park LTD

Waddeton Park Ltd is a very well-established and successful local housing land promoter and investor with considerable interests across the district. Waddeton Park Ltd has helped to facilitate new homes, affordable housing and other uses in the area. Specifically, Waddeton Park Ltd has interests in land at London Road, adjacent to the Cranbrook built-up area boundary, which is suitable and available for residential development. We attach a plan that shows this land (please refer to the Location Plan produced by Clifton Emery Design) Given the nature of their long-standing interests across the district, Waddeton Park Ltd is an important local stakeholder and is interested in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP made comments on Waddeton Park Ltd's behalf on the first Regulation 19 Consultation Draft of the East Devon Local Plan (2020 -2042) in March 2025. Comments were made on the following draft policies:

- SP01: Spatial Strategy
- SP02: Levels of Future Housing Development
- Chapter 4: Development at the West End
- WS09: Clyst Valley Regional Park
- HN02: Affordable Housing
- OL05: Green Wedges

- PB05: Biodiversity Net Gain Bell Cornwell LLP has now reviewed the Second Regulation 19 Consultation Draft of the East Devon Local Plan. It is noted from the consultation website that comments are being sought on changes to the draft plan only and that comments submitted previously do not need to be made again—they will be provided to the inspector for review. All comments made on the first Regulation 19 draft on behalf of Waddeton Park Ltd still stand. Comments on the Second Regulation 19 draft focus on the policy for the proposed new settlement – Strategic Policy WS01 – which was not included in the previous draft.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To explain the merits of allocating land to the south of London Road, adjacent to Cranbrook, for residential development.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

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

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district. The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 13. OUR OUTSTANDING BIODIVERSITY AND GEODIVERSITY Policy PB05: Biodiversity Net Gain Strategic Policy PB05 requires that 20% biodiversity net gain (BNG) should be provided as part of all forms of major development. Where this level of provision is unviable, clear evidence to this effect needs to be provided, and the statutory 10% requirement needs to be met. Any off-site provision should be provided in the immediate locality of the proposed development. The policy also stipulates that any development which is currently exempt from BNG will still be required to provide an ecological enhancement, commensurate to the scale of development involved. Government guidance is clear that LPA's should only seek more than the statutory requirement of 10% where there is robust evidence and justification to do so, and this does not appear to have been presented within the LPA's evidence base. Whilst the intentions of policy are noted, and The Estate would be in a position to deliver its own

BNG on-site, the logistical requirement to provide 20% BNG is extremely onerous and the Combe Estate OBJECTS to the policy as currently worded. Experience of the current, nationally mandated requirement to provide 10% BNG already demonstrates how difficult the process of delivering BNG is, with very high levels of bureaucracy and delay associated with the process. Furthermore, where the delivery of BNG cannot be delivered on site (and it does not appear that EDDC have tested whether COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 all BNG requirements can be delivered on their allocated sites) the off-site costs of doing this are significant and can have a significant impact on viability. Doubling this requirement to 20% is only likely to add to the complexity and degree of difficulty with achieving the required level of BNG and to act as a particular disincentive to the delivery of much needed development. Combe Estate is of the view that this policy has not been positively prepared, is not justified and given the uncertainties surrounding the BNG process is not effective. BNG is already required to be delivered as a result of national legislation. Given that this requirement will remain and within the context of the concerns outlined above, we would suggest that this policy is unnecessary, unsound and should therefore be amended to achieve 10% national requirements on major development.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

3. The Spatial Strategy

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

Policy

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

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

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district. The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 3. THE SPATIAL STRATEGY Strategic Policy SP01: Spatial Strategy Combe Estate supports the overall approach of Strategic Policy SP01: Spatial Strategy and, in particular, the support for prioritising significant development at the Main Centres (including Honiton) that meets local needs and those in immediate surrounding areas. The general strategy approach, which will see development allocations delivered at 5 different tiers of settlement in a dispersed approach to growth, is entirely appropriate and a sensible route to take. As main centre, Honiton (with its existing services, facilities and public transport infrastructure) is well placed to take significant but proportionate much needed growth, and securing this growth across a wide spread of settlements is the most appropriate strategy for the district. One of the failings of the current Local Plan (and part of the

reason why the LPA have suffered from a lack of 5 year housing land supply in recent years) is due to the current strategy that sees the vast majority of delivery in a single location (e.g. Cranbrook) and in a new town which takes significant time to deliver.

COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2

In our view, the current local plan did not focus sufficiently on existing towns and villages and an approach that looks to re-engage and deliver development at all tiers of settlement should be welcomed. Honiton can make a meaningful contribution to the district's overall housing land supply and growth of this type would also have the advantage of diversifying supply, meeting local needs and supporting rural facilities. Equally for employment development, sufficient provision must be made in the new local plan to support economic development right across the district so that growth is not stifled or lost to locations outside of East Devon. It is important to ensure that the new local plan can deliver sufficient supply to allow for choice and flexibility in the local market. The ability to deliver employment and housing in main centre locations is a positive approach which will ensure the districts housing and employment needs are catered for.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP03

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

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Site Specific –

Honi_07 The Estate are in control of land identified as Honi_07 – this was previously put forward as an allocation for 30 dwellings in previous versions of the plan. The client’s land can be accessed directly from Waterleat Avenue to the north. During the preparation of the Regulation 19. Version of the Local Plan, Members have decided to allocate Honi_12 (land east of Cuckoo Down Lane) as additional development land. This site is landlocked and access would need to come through our client’s land for delivery. Our client has no objection to the principle of this approach, but, given Honi_07 is road fronting this part of the allocation will need to come forward first to facilitate access to the wider development. COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 4 As drafted, the allocation states: Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12) This land is allocated for 101 homes and will form a residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high quality comprehensive development scheme is required for the whole site. Development within allocation Honi_12 is expected to be dependent on development within allocation Honi_07 coming forward, as access needs to be from Weatherill Road. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.” As drafted, the policy notes the different land ownerships and clearly Honi_07 will need to come forward first to secure access to Honi_12. Our client is also aware that Honiton Town Council may object to Hon_12 (the additional land beyond our client’s ownership) as an

allocation through this process. This has been reported prior to the consultation on this stage of the Local Plan. Should this be the case, and any further objections raised to the wider allocation, our client would also be prepared to deliver their site as a single allocation for circa 30 dwellings, which previous proofing layouts provided with our reg 18. Submission (and submitted again now for completeness) show can be accommodated on the site. However, we wish to stress that the site can also come forward as part of a first phase of larger development for circa 101 houses if this is felt appropriate. The key issues to stress here, is that The Estate's land is deliverable. Technical work undertaken to date demonstrates the site is deliverable and it be delivered as a first phase of comprehensive development with the ability to connect to adjacent land parcels. Summary Position / Conclusion Combe Estate are of the view that both of their allocated sites represent sustainable development, and these are deliverable and suitable site for residential led mixed use development that will help meet the overall housing needs in Honiton and East Devon.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

3. The Spatial Strategy

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

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

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

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

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: INTRODUCTION

Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district. The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 3. SPATIAL STRATEGY Strategic Policy SP08: Phased Delivery of Infrastructure and Services Strategic Policy SP08 includes a requirement for any developments to be brought forward in phases to be designed so that each phase or parcel provides pedestrian, cycling and vehicular access up to the boundaries of each development parcel/phase. Such developments shall also ensure that all services including electricity, water, sewerage, broadband and district heating services (where applicable) are also delivered up to the boundaries of each phase or parcel. This is a sensible policy to include, which can give housebuilders flexibility to build in phase to deliver across the plan period. It will allow both above and below ground services and infrastructure link up between different parcels of phased developments to minimise disruption in the delivery of adjoining phases or parcels of land.

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

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Full name: Iestyn John

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Darts Farm Limited

Proposal:

4. Development at the West End

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

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

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

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

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

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

Introduction Bell Cornwell represents the owners of Darts Farm Limited (DFL). DFL are landowners with considerable land interests across Exeter and East Devon. Bell Cornwell have been instructed to review the latest draft version of the draft East Devon Local Plan (the draft plan) and our comments are set out below. Observation on Draft Policy WS10

As part of the draft plan, Policy WS10 'Land North of Topsham' proposes a very large amount of development (comprising 596 houses plus a range of employment and social infrastructure) on land between Topsham and Junction 30 of the M5. Although a large amount of development is proposed under Policy WS10, the land is subject to considerable constraint, being long and thin, bounded by the M5 motorway on one side and divorced from ready access to existing facilities. In recognition of this, the draft policy makes it clear that prior to any development coming forward on the land, a masterplan will need to be prepared with coordination between Exeter and East Devon, with the involvement of landowners, the Highways Authority, National Highways and others. The draft policy notes that as part of this work, a Development and Infrastructure Delivery Framework is needed and this is to include the provision of a comprehensive transport strategy "to prioritise active travel and public transport" in order to connect the land into the wider area and reduce car use; a particularly

important consideration given the congested nature of the area due to its proximity to Junction 31, Sowton Industrial Estate and Sowton Motorway Services etc. Whilst the land is within East Devon's administrative area, it is right on the boundary with the Exeter City area. This cross boundary relationship will add complexity to the delivery of the allocation and will increase the need to look for opportunities to deliver the connections needed. We are aware that in consideration of the issues identified above, some work has been carried out to consider how growth in the area around the Land North of Topsham could provide the appropriate accessible transport connections. Both the Clyst Road and Newcourt Road Access Strategy (CRNRAS) and the Clyst Valley and New Communities Local Cycling and Walking Infrastructure Plan (LCWIP) identify locations for connections between the Land North of Topsham and the wider area. It is reasonable to expect that these studies will be used to inform the Delivery Framework for the allocation. Importantly, both these studies identify the potential for a new link, either a bridge or underpass, across the railway, connecting Clyst Road to Newcourt Road – see (1) in the plan extract, below. This connection would create a more direct route for active travel users (i.e. pedestrians and cyclists) from the Land North of Topsham for persons wishing to access Exeter and the Newcourt railway halt. This is the most simple to deliver of the two connections across the M5 put forward (the other being at Point 2, to the north and which would require the crossing of both the M5 and the railway). Darts Farm Land

DFL own land immediately adjacent and to the south west of that proposed for development under Policy WS10. Under Policy H2 of the emerging Exeter Local Plan, which will shortly be at examination, DFL's land (known as Site 91) is proposed to be allocated for housing development. There is a high likelihood that it will therefore come forward for development in the near future. As the extract drawing below shows, the DFL land is extremely well placed to help deliver a crossing over the railway line identified as being needed as part of the delivery of the Land North of Topsham and at the Point 1 location. As the CRNRAS and LCWIP studies indicate, a bridge connection between the southern edge of the WS10 and our clients land will enable a proper, non-car connection to be provided onto the existing Newcourt Road and then across the motorway via the existing bridge to give access to Exeter and notably Newcourt Railway Station. This is the easiest and most economically viable means of making that connection. The other alternative (at Point 2, see CRNRAS extract above) is much more complex and would need a bridge across both the motorway and the railway line to connect into the wider network. As part of their expected Site 91 housing allocation, DFL are very willing to allow part of their land to be used to accommodate the installation of bridge to connect to the Land North of Topsham allocation and so help enable its delivery in a sustainable manner. Given the 'in principle' merits of a connection in this direction, especially relative to other options, and DFL's willingness

to help enable this, we would suggest that the wording of draft Policy WS10 be adjusted to make explicit reference to the provision of such a link. This is necessary to ensure that Policy WS10 meets the tests of soundness set out at paragraph 36 of the National Planning Policy Framework which requires development plan policies to be positively prepared, justified and effective. Darts Farm Limited would welcome the opportunity to have discussions with the Council on how they might assist with the delivery of a link onto their land.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

4. Development at the West End

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

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

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

REPRESENTATION TO EAST DEVON DISTRICT COUNCIL – “NEW COMMUNITY WORKSHOP – LANDOWNERS / AGENTS” - WALDRONS FARM, SIDMOUTH ROAD, FARRINGDON, EX5 2JX Manleigh Property Limited (MP) is representing WALDRONS (SW) LIMITED (hereafter ‘WSW’) in respect to their land ownership at Waldrons Farm, Sidmouth Road, Farringdon, EX5 2JX (hereafter referred to as ‘the site’). MP is submitting representations to the New Community Workshop – Landowners / Agents consultation for the emerging new town on behalf of WSW. Whilst WSW supports the introduction of the new settlement, this submission aims to briefly set out the existing planning backdrop to the subject site as well as potential options for the site as part of the new town. Whilst it is recognised that this current consultation process is not a request for formal representations akin to Regulation 18, this note aims to provide the council with some useful context to the site for the benefit of the next phase of the masterplanning exercise.

1. SITE BACKGROUND AND CONTEXT The site is located on the southern edge of the proposed new settlement with direct access on to the A3052. WSW’s land ownership equates to a total of 3.25 hectares with circa 130 metres of frontage on to the main road. The land provides access to industrial units on the western edge, while the site itself is partially under construction for industrial development near to the existing access point (see section 2). The wider land is a poor quality field used intermittently for grazing and houses a large 132 kV electricity pylon on its western edge before the power

line crosses the A3052. There is a secondary access point on to Parsonage Lane which is due to be made redundant imminently. A satellite image of the site can be found in Appendix A. Previous representations have been made to the East Devon Local Plan 2020-2040 Preferred Options Reg. 18 Consultation Draft Plan - Autumn 2022. In the proposed local plan (and as part of previous SHELAA work) Waldrons Farm has been given the reference Waldrons Farm, Sidmouth Road (Farr_02). For the avoidance of doubt, the representations covers three titles, namely: DN358990, DN624912 and DN379045.

2. SITE PLANNING HISTORY Of key relevance to the proposals for the new settlement must be existing planning history to sites contained within the proposed new settlement area.

2.1 Outline Planning Consent Ref: 09/2193/MOUT The subject site was initially granted outline consent in June 2010 for “the change of use of land and associated development for B2 (industrial) and B8 (storage and distribution)”. The site plan for this consent can be found in Appendix B . This consent includes the provision of:

- a new access to the site, immediately east of the existing access to significantly improve visibility, junction width and therefore safety
- a mix of “small business” industrial units, larger industrial units and significant open yard space
- soft landscaped green edges to the site.

2.2 Reserve Matters Consent Ref: APP/U1105/A/14/2214150 Subsequent to the outline consent, a reserved matter application was granted at appeal for “approval of access, layout, scale, appearance and landscaping pursuant to outline application 09/2193/MOUT for change of use of land and associated development for B2 (industrial) and B8 (storage and distribution)”. The site plan for this consent can be found in Appendix C. This consent included the provision of:

- 708 m2 of small business industrial space across 6 different units
- 24 parking spaces (1 per 30m2)
- Delivery of the new access in line with the outline consent and works to the A3052 for its widening
- Blocking up of the secondary access on to Parsonage Lane
- Delivery of a new attenuation pond for SuDS WSW commenced this development in 2016 following its granting at appeal. Pre-commencement conditions were discharged and significant initial works were undertaken, including earthworks, planting, landscaping and setting out works for the new access. However, due to the financial pressures associated with delivery of the consent’s infrastructure works, construction

was halted. WSW is principally a farming business with farm land holdings further to the north west near Aylesbury and West Hill. The decision was made at the time to concentrate on farming endeavours with a view to finishing construction works at a later date. WSW intends to recommence works and finish delivery of Phase 1 in 2025. To summarise, both above consents demonstrate the site's perceived suitability for industrial development. The site currently provides access to existing industrial units to the west and is subject to ongoing development for industrial units at the front of the site. The wider site presents a good opportunity for the delivery of further employment space to serve the new settlement of East Devon.

4. SITE CONTEXT IN CURRENT PROPOSED OPTIONS At the time of writing, two initial concept scenarios have been put forward for the new settlement by East Devon District Council. Both Option 1 and Option 2 show the provision of increased employment provision at Hill Barton Business Park, which currently lies c.0.5km to the west of the site. Both options see Hill Barton's size increasing towards the site but stop short of including the site within the proposed employment space expansion, instead showing the site as Public Open Space. We would suggest that due to the site's position and planning history that it is included within the proposed employment space expansion for the new settlement.

5. POTENTIAL SITE REDEVELOPMENT With the above considerations, WSW have begun the process of exploring potential further development of the wider site that expands on the reserve matters consent and looks to provide an increased amount of floorspace to the previous outline consent. Whilst the former outline consent comprises mainly of open yard space, the new site proposal, shown in Appendix D explores the possibility of increasing employment sqftage with the introduction of larger industrial units (A, B and C). The indicative proposal is designed around a "commercial courtyard" solution to ensure the site is inward looking. The scheme looks to integrate the existing industrial units that adjoin the land to the west and provide soft edges to the site.

5. SUMMARY OF REPRESENTATIONS This note has been submitted to East Devon District Council to ensure that the site's relevant planning history is taken in to consideration during the masterplanning process for the new settlement. Alongside this, the site has a number of elements that make it suitable to be included as part of the proposed employment space expansion. This includes:

- Existing industrial units adjoining the site's western boundary
- Wide frontage on to the A3052 including a new access arrangement
- Proximity to the proposed employment space expansion at Hill Barton

- Unsightly existing features, including a large 132 kV telephone pylon, detracting from the wider countryside We politely request East Devon Council to consider the above matters in the next phase of masterplanning for the new settlement.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Waldrons Farm

Proposal:

4. Development at the West End

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

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

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Our clients own Land at Waldrons Farm, which is land adjacent to the A3052 and immediately to the east of Hill Barton Business Park, and to the west of land allocated for a 'sports hub' as shown on the new community masterplan. Their land interests (and the planning history and development permitted on this land) is shown within the representation appended to this submission.

The extent of the allocation for the new community is shown on the Policies Map and the associated settlement boundary is the policy basis for expressing the extent of the new community area. Our client's land is shown within this boundary and part of the new community settlement. Our client supports this position.

A masterplan for the new community area is also included as part of the evidence base for the second Regulation 19 Publication Draft of the new Local Plan - this is also shown as figure 7 of the Local Plan. On this plan, our client's land is shown as being outside of the masterplan boundary area, due to the land being classed as an 'existing employment area'. Our client's site benefits from a series of historic planning permissions for employment land that have seen commencement made on the site and while development has not yet been completed, these permissions remain extant. The

principle of economic development has therefore been established and commercial buildings will be delivered. On this basis, it makes sense that the site has not been considered within the masterplan, as the uses and type of development proposed for the site is set. However, the site also needs to be in the settlement boundary for the new community, as it will be read as being part of Marlcombe. The site is effectively the southeastern corner of the settlement and it is inherently sensible to include this land within the boundary of the new community in light of its sustainability credentials: the land is in a very accessible and sustainable location, off the A3052 and accessible by walking, cycling and public transport and the area is served by regular bus services.

Our clients therefore endorse the inclusion of the land within the new community settlement as expressed through the proposed policies map.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our client is supportive of the current position that includes their land interests within the settlement boundary for the new community. This is sensible given the characteristics of the site and its relationship to the remainder of the proposed settlement. Our client would wish to attend any hearing session if any changes or modifications are proposed to the boundary.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

5. Development in the Towns and Villages

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

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

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

1(c). If the comment is related to a site, please state the site reference here.:
Gitti_03, Gitti_04 and Gitti_05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Please see previous representations submitted to the reg19. consultation which still apply and are valid. The allocation is in our client's ownership. The current version of the policy has included additional text requiring consideration of and landscape matters which will require any scheme to include the planting and maintenance of additional hedgerows and small areas of woodland.to conserve and enhance the natural beauty of the site and its wider national landscape setting. The Estate are supportive of this approach which will allow the development to further integrate with the surrounding landscape character.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See original submissions - no further comment.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To explain the merits of allocating this site, should this be necessary

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwall

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

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

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

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

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

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

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: Bell Cornwall LLP on behalf of Waddeton Park LTD

A very important part of the proposed spatial strategy for the new East Devon Local Plan and the strategy for how East Devon will meet its housing land supply requirement is a proposed new community – Marlcombe. The strategy is flawed because there is too much reliance on this proposed new community, when there is still a lot of uncertainty over how much development can be delivered there and how quickly this could be brought forward and, therefore, on the ability of Marlcombe to provide the required number of houses within the Plan period. Critique of the Masterplan for the Proposed New Community The masterplan for Marlcombe, included in the draft Local Plan as Figure 7, is very high level at this stage. There is still a lot of uncertainty and work that needs to be done to understand whether it is feasible for the new community to deliver 8,000 new homes on the land that has been earmarked and how quickly the housing could be delivered, or even started - it is recognised widely that there will be significant challenges due to the large number of different land ownerships, the topography of the land, highways constraints etc. Particular areas of concern are highlighted on the attached High Level Constraint and Capacity Check plan and are summarised below:

- Density - 180ha of land are allocated for residential development i.e. the 8,000 new homes. This results in an average density of 45dph. Indeed, the draft Policy WS01 states

that Marlcombe will provide a site-wide average density of at least 45 dwellings per hectare, with densities of up to 75 dwellings per hectare within and around the town centre. This is very high. By way of comparison, the density for Cranbrook town centre is not less than 55-60 dwellings per hectare (Policy CB22). It is likely that a large proportion of apartments and terraced housing would be needed to achieve this average density and it is highly questionable whether this would align with identified needs, market demand and, thus, the willingness of developers to bring forward housing in this form.

- Topography - There are some areas of steep ground within the masterplan area that are likely to be unsuitable for development without extensive engineering works. This could have a significant impact on the number of homes that can be delivered in these areas.
- Heritage Impact - There are a number of heritage assets within the masterplan area, either within or very close to areas earmarked for residential development, which, due to the need to protect their setting, could reduce the developable areas and the number of dwellings that can be delivered in these locations. More work is required in this regard.
- Attenuation and Drainage - Attenuation and drainage proposals look to be located in flood zones and within steeply sloping areas. Is this feasible?
- Open Space and Biodiversity – Is it credible that sufficient public open space, Suitable Alternative Natural Green Space and biodiversity net gain could be provided on the land that is available?

We are aware that comments along these lines have been made by a large number of other commentators, who echo the concerns outlined above. There seems, therefore, to be a consensus that there are questions over the ability of the masterplan to deliver the required development.

Opportunity for Modest Additional Growth Next to Cranbrook:

Because of the significant uncertainty about over-reliance on the new community, especially for housing delivery early in the Local Plan period, sensible options for housing delivery in the West End around Cranbrook must be given due consideration and have not been (please refer to the comments made in March 2025). It would be inherently sensible to look for modest additional growth opportunities around Cranbrook, which could make a meaningful contribution to housing delivery early in the

Local Plan period. This would take some of the pressure off the new community whilst there is still so much uncertainty.

Waddeton Park Ltd is promoting housing development on an area of land to the south of London Road, immediately adjacent to the Cranbrook Plan area and to the built-up area boundary of Cranbrook – please refer to the Location Plan. This land is available now and capable of early delivery. Waddeton Park Ltd has been liaising with East Devon District Council on this site since April 2025 and has been through lengthy and detailed and very positive pre-application engagement with officers, reference 25/0030/PREAPP. Detailed technical analysis has been undertaken by a group of local technical experts covering landscape and visual impact (including a detailed green wedge assessment), highways and access, ecology and biodiversity net gain, flood risk and drainage, archaeology and heritage matters, trees, noise, air quality, contamination and energy and sustainability and the conclusion of the technical reports is that development of this land for residential purposes is deliverable on technical grounds. This detailed information has informed an illustrative layout, which has been produced by Clifton Emery Design – a copy is attached to these comments. The detailed feasibility work that has been undertaken has determined that the following can be delivered on the site:

- A landscape-led development of approximately 136 dwellings, comprising a mix of dwelling sizes and types;
- Approximately 4.72ha of public open space, which exceeds both the adopted and draft local plan policy requirements;
- 20% biodiversity net gain, inline with the policy requirement in the draft local plan;
- Early delivery – development could commence within two to three years. Officers have advised that they would be minded to support the proposals on this basis, having concluded that any adverse impacts of the development would not significantly and demonstrably outweigh the benefits. The benefits of the proposals are:
 - The delivery of housing, quickly, in a sustainable location;
 - A policy compliant level of affordable housing, on site;
 - Local economic benefits, both in terms of jobs created at the construction phase of the development and an increase in spend in the area once the dwellings are occupied;
 - Large extents of public open space and SANGS;
 - Early delivery – development could commence within two to three years.

As a result of the extensive work that has been carried out to-date, there is considerable certainty that a housing development on the land is credible, deliverable, in a sustainable location and able to be brought forward in a way which is entirely compatible with the character and constraints of the area in which it would be located. Concerns Over East Devon District Council's Ability to Benefit from NPPF Transitional Arrangements Regardless of whether or not the new community in its proposed form turns out to be feasible and deliverable, the draft Local Plan is still not sound because it is still not considered that East Devon District Council can benefit from the transitional arrangements set out in Annex 1 of the 2024 NPPF. The overall housing requirement figure of 20,909 dwellings (net) should be higher because the figure should be calculated using the standard methodology.

The transitional arrangements apply when a Local Plan has reached Regulation 19 stage on or before 12th March 2025. Regulation 19 is a final stage of public consultation i.e. a proposed submission document. The version of the draft Local Plan published by East Devon District Council for consultation back in March 2025 did not include the draft policy wording for the proposed new community, which, as set out above, forms a critical part of the spatial strategy for the Local Plan. A complete version of the draft Local Plan did not reach Regulation 19 stage until December 2025 and, therefore, the transitional arrangements should not apply and East Devon District Council's housing land supply figures should be re-calculated using the standard methodology, which would result in a higher overall housing figure for the district for the Local Plan period. This, in addition to the significant uncertainty over the delivery of the new community, provides a strong reason to allocate additional sensible sites for housing delivery around Cranbrook in the West End located, such as Waddeton Park Ltd's land to the south of London Road.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A complete version of the draft Local Plan did not reach Regulation 19 stage until December 2025 and, therefore, the transitional arrangements should not apply and East Devon District Council's housing land supply figures should be re-calculated using the standard methodology, which would result in a higher overall housing figure for the district for the Local Plan period. This, in addition to the significant uncertainty over the delivery of the new community, provides a strong reason to allocate additional sensible sites for

housing delivery around Cranbrook in the West End located, such as Waddeton Park Ltd's land to the south of London Road.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To explain the merits of allocating land to the south of London Road, adjacent to Cranbrook, for residential development.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

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

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

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

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

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
The extent of the allocation for the new community is shown on the Policies Map and a masterplan for the new community area is included in the second Regulation 19 Publication Draft of the new Local Plan as figure 7. Our clients endorse both.

Our clients own Hill Pond Camping and Caravan Park, to the north of the A3052 and immediately to the west of Hill Barton Business Park, which falls within the new community area. It is inherently sensible to include this land within the boundary of the new community in light of its sustainability credentials: the land is in a very accessible and sustainable location, off the A3052 and accessible by walking, cycling and public transport (the Cat and Fiddle bus stop, which is within walking distance, is served by a number of regular bus services).

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The comments made on our clients' behalf to the first Regulation 19 Publication Draft still stand.

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

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Darts Farm Limited

Proposal:

4. Development at the West End

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

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

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

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

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

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

-

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

-

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

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

-

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

Greater clarity is needed on the delivery of connections from the site into the wider area

in order to ensure that the allocation is viable and deliverable. The policy should make clear the requirement that a link to Newcourt Road is needed to support delivery of the allocation. Please see attached representations.

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

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: The policy does make it clear that the delivery of the allocation will require joint working with Exeter City Council and this will be key to ensuring the success of this policy.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To provide evidence on the delivery on the allocation to which this representation relates.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

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

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

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

1(c). If the comment is related to a site, please state the site reference here.:
Exmo_18

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

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

Clinton Devon Estates are the owners of a very large area of land within East Devon. As part of its interests, the Estate undertakes residential and commercial development and manages substantial farming and forestry operations. The main issue addressed at that SPC meeting was whether access, be it primary or secondary, should be permitted to Exmo_18 from Salterton Road. This reflected officers' previous concerns over the potential impact on the National Landscape and visual approach to the town centre. The commentary at the meeting focused on ensuring that the openness and visual experience when entering Exmouth from the east is taken into consideration, rather than seeking to impose restrictions on the height of any development at Exmo_18. It was acknowledged that Exmo_17, on the southern side of Salterton Road, sits across from Exmo_18, and that future development of Exmo_17 will alter the view at the entrance to the town. The SPC voted to approve the inclusion of secondary access from Salterton Road adopting wording, set out in the meeting, which related to the design of that access, to minimise the impact on the setting of the National Landscape. At no point during either of the two recent SPC meetings was it proposed or agreed, that the site at Exmo_18 should be subdivided into rigid zones such as the "southern third", nor that any zone should be subject to any special constraints or specific height restrictions. On the contrary, explicit support was shown toward development across the site, including the southern part. There was clear confirmation that the site is a logical extension of an existing, successful business park and important to Exmouth's

future economic function. Restricting the height of the development based on an unspecified topographical feature pre-empts site specific master planning and design work. The SPC's concerns regarding any development fronting Salterton Road/B3178 will be appropriately addressed during the planning process. Ultimately, the acceptability of any development within the southern part of the land on the nearby National Landscape can be assessed as part of any future planning application and, if necessary, changes made to the proposal at that point. Given the concerns outlined above, the policy in respect of Exmo_18 is currently unsound in that it includes limitations which are likely to undermine the deliverability of commercial use on the land. As worded, the policy does not meet the NPPF requirements (at paragraph 36) which requires that local plan policies be justified and effective. We therefore propose an amendment to the policy wording to overcome these concerns.

The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. They therefore have considerable interest in the policies and objectives as now set out in the current draft of the plan. On behalf of Clinton Devon Estates, we have therefore reviewed the plan and therefore make the following comments in connection with the proposal to allocate the land to the east of Liverton Business Park under draft Strategic Policy SD01. This policy states:

“This land, to the east of Liverton Business Park is allocated for employment uses and will form an extension to the existing business park and extends to around 2.7 hectares in size. Development should take account of the relationship between the site and the East Devon National Landscape, with particular care taken to ensure that any development in the southern third of the site is sensitively designed and kept below the level of the ridgeline to the south. To avoid adverse landscape and visual impacts on the National Landscape and its setting, primary vehicular access should be taken from the Liverton Business Park. Any secondary access from Salterton Road should be carefully designed and screened to minimise any impacts on the setting of the National Landscape. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.” [Our underlining] We welcome the previous Strategic Planning Committee's (SPC) support for the addition of a secondary access to the site from Salterton Road and its decision to amend the draft policy wording to allow for this. However, we have serious concerns over the new requirement to keep development at the southern third of the site “below the level of the ridgeline to the south.” The wording underlined, which was not discussed during the SPC meeting held on 25th November 2025, introduces a new unnecessary, unjustified, and ambiguous planning restriction. There is no clearly defined or obvious

ridgeline to the south when standing at the Salterton Road/B3178 boundary of Exmo_18. The ridgeline could be set by the hedgerow on the southern side of Salterton Road, but its limited height would effectively preclude any development at the southern end of Exmo_18.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested Amendment to Policy Wording for Exmo_18

In summary, the inclusion of the drafting shown underlined above was not explicitly or implicitly endorsed by the SPC and does not define a measurable ridgeline capable of supporting a firm policy restriction. Therefore, we request that the text is revised as follows, with the struck through text to be removed: “Development should take account of the relationship between the site and the East Devon National Landscape, with particular care taken to ensure that any development in the southern third of the site is sensitively designed. To avoid adverse landscape and visual impacts on the National Landscape and its setting, primary vehicular access should be taken from the Liverton Business Park. Any secondary access from Salterton Road should be carefully designed and screened to minimise any impacts on the setting of the National Landscape. Existing hedges to the southern and eastern site boundaries should be reinforced and appropriately managed and additional trees planted.”

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

5. Development in the Towns and Villages

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

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

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

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

Gitt_03, Gitti_04, Gitt_05

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

The inclusion of Gitti_03, Gitti_04 and Gitti_05 for mixed use development is clearly supported as its represents a logical approach to development and growth to the west of Honiton, noting:

- the position of Honiton within the settlement hierarchy for East Devon;
- the sustainable transport options and overall level of services and facilities in the town;
- the proximity of the site to the A30 COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2
- The location of the site relative to existing jobs and food retail provision within the town of Honiton;
- The constraints that exist elsewhere in the settlement (for example this site can be delivered entirely outside of the AONB). Strategic Policy SD03 is considered to be sound, though we would recommend some modest tweaks/changes to wording. The specific policy allocating Gitti_03, Gitti_04 and Gitt_05 states; “Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide: A. 310 homes; and B. 14.6 hectares of land to accommodate employment and community uses. This

allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses. Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities, to include a shop or shops and a hall, will need to be provided within or next to 84 residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation). It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e. via Meadow Acre Road). Vehicular access to the employment development will need to come via Hayne Lane. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes, including bus services.” In terms of the objectives of the policy we would draw attention to the masterplan submitted in support of the current representation. We would ask that it is noted that: COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 3

- The Estate are committed to seeing the site delivered for a minimum of 310 homes.
- The Estate are committed to delivering the area of land to the north of the allocation which comprises part of the 14.6 hectares of employment and community uses (note part of this is land owned by EDDC) – however, additional flexibility should be built into the definition of uses permitted in this part of the policy to include wider commercial uses and leisure uses.
- The need for masterplanning of the sites is noted, and this can be controlled in-part, through an outline planning application.
- The development can be accommodated without being located within the East Devon National Landscape and account can be taken of landscape setting.
- Similarly, the evolving masterplan takes account of the topography and proximity of the historic village of Gittisham on the western edge the site which has taken account of topographical features and heritage assets.
- Both of the areas above can be utilised for BNG delivery and open space to ensure appropriate setting is retained for heritage assets and landscape designations.

- The Estate are happy to provide community facilities, to include a shop or shops and a hall as part of any wider masterplanned development.
- The importance of attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site are also noted and deliverable.
- In terms of vehicular access to the residential development – this should not be solely from Meadow Acre Road – which is located within an adjacent development. Access will be available from Hayne Lane (as per transport / access notes submitted at the Reg.18 stage) and shown on the masterplan, with a secondary route potentially available from Higher Ash Close. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

5. Development in the Towns and Villages

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

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

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

1(c). If the comment is related to a site, please state the site reference here.:
Honi_07

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

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

Please see previous representations submitted to the reg19. consultation which still apply and are valid. The current version of the policy has reduced the size of the allocation to 30 dwellings - this land is in our client's ownership. You will see in our previous reps, that this is the basis on which our client's site was promoted, and a scheme of 30 dwellings is deliverable, with the benefits of Honi_07, being:

- delivering development in an incredibly sustainable location in terms of proximity to public transport and the service and facilities in the town.
- It is a small site that can be built out quickly, as a single phase which can assist with housing land supply
- The site can take its own access safely from the site frontage of Waterleat Avenue with no impact on the highway network
- It delivers 30 houses, as per the indicative layout previously provided.

- Provides attractive ecology, landscape, open space buffers on the south and east boundary, which mitigates impacts on heritage assets and the National Landscape
- Opportunities for planting reinforcement along the boundary with Waterleat Avenue
- High quality public open space and drainage features will be secured which provide setting for the adjacent listed buildings

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See original submissions no further comment.

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To explain the merits of allocating this site, should this be necessary.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): J Persey

Proposal:

5. Development in the Towns and Villages

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

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD25

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

1(c). If the comment is related to a site, please state the site reference here.:
Plym_03

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

-

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

None requested at this time but resubmission of representations to Reg 19 consultation

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Please note that our client would wish to reserve the right to attend the hearing session for 'Plymtree' and it's associated allocation, should this be of benefit to the Inspector.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

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

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

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

1(c). If the comment is related to a site, please state the site reference here.:
Exmo_18

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

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

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

-

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

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

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to provide insight into the issue relevant to the delivery of the proposed development of the Exmo_18 land.

Full name: Dan Rogers

Organisation (where relevant): Bell Cornwell

Other party name (if relevant): On behalf of Bell Cornwell LLP

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

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

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

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

Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district. The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 8: MEETING HOUSING NEEDS Strategic Policy HN02: Affordable Housing Strategic Policy HN02 sets out the Council's proposed approach to the provision of affordable housing as part of new development. In summary, it proposes that affordable housing be provided on housing schemes of six or more dwellings in designated rural areas and 10 or more in non-designated rural areas. In Honiton, housing allocations will be required to deliver 30% affordable housing. Combe Estate support the approach in Policy HN02 which would require their land interests at Honiton to deliver a level of affordable housing relative to "value area" in which Honiton is located – noting that the towns of Sidmouth and Budleigh will be required to deliver 35% affordable housing. However, the current affordable housing requirement in Honiton under the extant Local Plan is for 25% affordable housing to be delivered. This current plan set affordable housing positions in

a period that pre-dated a variety of issues that have affected the housing market in the last five years including post pandemic effects and other economic shocks and which collectively have substantially increased borrowing and construction costs. It is well recognised that these impacts, along with much the increased technical requirements (notably in relation to, for example, biodiversity net gain and flood COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 risk) and significant delays in the planning process have had direct effects on the viability of housing schemes. We note that Core Submission Document CSD-04 (East Devon Local Plan Viability Assessment) suggests that with the exception of Axminster, 35% affordable housing is generally viable on allocated sites, but that 30% requirement is currently proposed for Honiton and is suggested to “provide additional viability headroom to meet additional costs.” Obviously, a precautionary approach to viability is important to give developers flexibility and room to manoeuvre in an uncertain market. However, in order to achieve the level of affordable housing requirement set out in the policy, it is critical that it is demonstrably viable to do so. It is unclear whether the Local Housing Need Assessment which underpins the Local Plan is supported by any viability assessment, and given the proposed affordable housing targets are generally higher than the requirements in the current Local Plan, it is essential that this is tested through detailed viability. This should be done before examination to avoid delays during the examination (taking the lessons learned from the viability sessions of the Cranbrook Plan DPD as an example). At present, it is unclear whether sufficient testing has been undertaken to confirm the thresholds of affordable housing set out are viable and further infrastructure costings required to ensure the LPA have a robust position. We would therefore question soundness at the current time.