

**Our Ref** SH/PCL/2168  
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**PCL Planning Ltd**  
13a-15a Old Park Avenue  
Exeter  
Devon  
EX1 3WD  
United Kingdom  
t: +44 (0)1392 363812  
www.pclplanning.co.uk

Planning Policy Team  
East Devon District Council  
Blackdown House  
Border Road  
Heathpark Industrial Estate  
Honiton  
Devon EX14 1EJ

Dear Sir/Madam,

## **EAST DEVON COUNCIL LOCAL PLAN CONSULTATION – REGULATION 19 PART 2**

Please find herein representations on the Regulation 19 (Part 2) East Devon Emerging Local Plan consultation made on behalf of our client, Waddeton Park Limited (Honiton).

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

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

For ease of reference the following representation forms are submitted as our response to this Part 2 consultation:

- Part A - Personal Details
- Part B – Policies SP01 & SP02 (Spatial Strategy and Future Housing Level)
- Part B – Policy WS01 (Development of Marlcombe)
- Part B – Policy SD03 (Honiton and its Development Allocations)

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

- Policy SP01 (Spatial Strategy)
- Policy SP02 (Levels of Future Housing Development)

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

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

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

I would be very grateful if you could please keep me informed of the outcome of these representations and the progress of the Plan via the email address: [planning@pclplanning.co.uk](mailto:planning@pclplanning.co.uk). Should the Council wish to discuss any of these matters. Then please do not hesitate to contact me.

Kind regards,



Stuart Houlet BA(Hons) MA MRTPI  
**For PCL Planning Ltd**  
e: [s.houlet@pclplanning.co.uk](mailto:s.houlet@pclplanning.co.uk)

**Enclosures:**

- Appendix 1: Part A - Personal Details
- Appendix 2: Part B - Policies SP01 & SP02 (Spatial Strategy and Future Housing Level)
- Appendix 3: Part B - Policy WS01 (Development of Marcombe)
- Appendix 4: Part B - Policy SD03 (Honiton and its Development Allocations)
- Appendix 5: Heathfield Manor Indicative Masterplan