

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

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 SP04: Employment Provision and Distribution Strategy

Combe Estate supports the overall approach of Strategic Policy SP04, which sees their land at Gitt_03 and Gitt_04 allocated for employment use. The Estate support the technical evidence base which has determined the quantum of new employment land proposed for Honiton.

It is noted that this site is currently allocated in the adopted Local Plan, and the land within our client's control is entirely available for development. There is strong support for the allocation and our client is committed to seeing this allocation delivered.

However, we note that within policy SP04 the uses allocated on designated sites are for B2, B8 and E(g) use. Whilst Combe Estate clearly support this allocation in principle, it is disappointing that the allocations or policy text within SP04 does not clearly allow for a wider disposition of land uses.

For example, paragraph 3.21 of plan states that, "Particular attention is given to emerging technologies, green industries, and adapting to changes like increased homeworking and artificial intelligence." However, there appears to be very little, if any, content within the policy that makes provision for a wider range of employment opportunities beyond traditional office and industrial uses.

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As such, Combe Estate would suggest that a wider range of employment generating uses should be defined within Policy SP04 to allow for a changing employment market and to ensure that East Devon District as a whole is able to respond and provide employment accommodation that reflects a modern economy.

In summary, while Combe Estate support the allocation of their land, there needs to be greater acknowledgement of the changing nature of employment activity, with amendments to policy to include:

- Giving equal/greater weight to other Class E uses (not just E(g) within in the policy).
- Include a policy clause that would allow flexibility to deliver more than ‘traditional’ employment uses where there is evidence to suggest this is appropriate (e.g. a need for other leisure, tourism, community uses)