

Filtered Data Export

**Full name:** David Valentine

**Organisation (where relevant):** Gittisham Parish Council

**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, Gitti\_05

**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?:** 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.:** This is a submission made on behalf of Gittisham Parish Council. The Gittisham Parish Council has consistently challenged the allocation of land for residential and industrial development on land to the west of Hayne Lane. The GPC have submitted as part of the 1st Reg19 consultation a wide range of objections to the allocations Gitti-03/04 and 05. The lack of detailed and robust infrastructure and viability assessments to support the delivery of proposed allocations has been an area of concern which has been previously raised by Gittisham Parish Council directly with EDDC. It is clear that sustainability has been sacrificed in order to meet housing and employment targets. The additional evidence now provided as part of the 2nd Reg 19 Consultation raises additional concerns regarding the allocation of residential and industrial land in unsustainable locations. It is also noted that an updated East Devon Local Plan Infrastructure Delivery Plan (IDP) has been submitted as additional evidence as part of 2nd Reg 19 consultation. The opening comments within that document state: Infrastructure delivery is fundamental to supporting sustainable development. Strategic and well-planned infrastructure ensures that new developments contribute positively to community needs and objectives. Developments lacking appropriate infrastructure risk being suboptimal or unacceptable and may result in environmental harm. Comprehensively understanding infrastructure requirements and establishing robust delivery mechanisms is crucial for substantiating the Local Plan, informing planning

documents, guiding Community Infrastructure Levy allocations, and supporting broader council initiatives. It is against the background of this statement together with the additional evidence to be found in the Waste Cycle Study Nov 2025 (additional evidence to support 2nd Reg 19 Consultation) that Gittisham Parish Council wish to reaffirm in this 2nd Reg 19 Consultation the objections previously made to the proposed allocations Gitti-03/04/05, and to submit that Honiton is not a sustainable location for the level of residential and industrial development being promoted. Prior to the publication of the Water Cycle Study (WCS) the Environment Agency (EA) in response to the EDDC Sustainability Appraisal (Feb 2025 page 77) expressed concerns about the Sustainability Appraisals “limited focus” on “...sewage capacity”. They also advised policies (in the new Local Plan) should “require proof of sewage infrastructure adequacy prior to any development approval” and also that “policies must explicitly tie development phasing to infrastructure delivery”. These concerns have now been confirmed. It is submitted that the findings contained within the Water Cycle Study together with the concerns of the EA, seriously undermine the likelihood of the Honiton allocations coming forward within the plan period. Looking in detail at the Water Cycle Study the current waste discharges into the River Otter at Honiton are significantly exceeding capacity and, that to meet the requirements resulting from the housing allocations alone at Honiton (including Gitti-05) would require an increase in capacity at the Honiton STW of 73%. That capacity would also have to be increased further as a result of the 15 ha industrial allocation at Gitti-03/04. It is notable that there is an absence of any SWW investment programme to provide any improvements at the Honiton STW. The level of investment required to address existing and future demands cannot be financed from developer contributions alone. Given the current and projected capacity issues at this STW together with the absence of any investment strategy by SWW, and in parallel with other known existing infrastructure deficiencies, it is submitted that Honiton cannot be regarded as a sustainable location for the scale of development that the Local Plan is promoting. Although the IDP and WCS are not part of the emerging Local Plan the IDP is “crucial for substantiating the Local Plan” (IDP para 1.2). Given its shortcomings the IDP clearly fails to perform this “crucial” task and, consequently challenges the soundness of the Local Plan. In the absence of there being a clear and robust viability assessment for each of the major Honiton allocations and particularly those allocations Gitti-03/04/05, and in the light of the new evidence, in particular the IDP and WCS, forming part of the 2nd Reg 19 Consultation, the Gittisham Parish Council continues to raise its objections to the continuing allocations of Gitti-03/04/05 for employment and housing purposes and to object in general to Strategic Policy SD03 : Honiton and its development allocations, as the evidence supports the opinion that Honiton is not a sustainable location for the scale of development proposed .

**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.:** The deletion of development allocations Gitti\_03, Gitti\_04, Gitti\_05. These deletions would acknowledge the unsustainable characteristics of these allocations and furthermore would assist in the recognition of Honiton as an unsustainable location for significant residential and employment development.

**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.:** EDDC have failed to acknowledge the issues regarding viability, infrastructure deficiencies and sustainability in respect of the allocations Gitti\_03/04/05 and in respect of Honiton in general.