

East Devon Local Plan 2020 to 2042

Second Regulation 19 Publication draft

Representations on behalf of Obsidian Strategic Asset Management

26 January 2026

Introduction

CarneySweeney acts for Obsidian Strategic Asset Management (Obsidian) in connection with Land at Kings Road, Honiton, East Devon. This land is being promoted for residential development.

CarneySweeney submits the following representations on behalf of our clients which are to be read in conjunction with previous representations submitted to the Regulation 19 Publication draft in March 2025 (Reg 19 Rep) which is appended in full.

Scope of the Previous Regulation 19 Representation

The Reg 19 Rep commented on the following matters and policies within the draft East Devon Local Plan 2020 to 2042 (draft EDLP):

Policy Context for Plan Making

Site Allocation

- Strategic Policy SD03: Honiton and its development allocations

General Policy Comments

- Local Plan Vision Statement
- Housing Targets / Delivery
- Viability

Specific Policy Comments

- Strategic Policy HN01: Housing to address needs
- Policy HN03: Housing to meet the needs of older people
- Policy HN04: Accessible and Adaptable Dwellings
- Policy HN05: Self-build and custom build housing
- Strategic Policy PB05: Biodiversity Net Gain
- Strategic Policy PB07: Ecological enhancement and biodiversity in the built environment
- Policy PB08: Tree, hedges and woodland on development sites
- Policy PB09: Monitoring requirements for new planting schemes

Scope of the Second Regulation 19 Representation

Where the above policies have not been amended in line with our previous comments and requested changes, the previous Reg 19 reps are reiterated and should be given full weight in the Examination Process. The commentary on these policies remains valid and the suggested changes justified.

Where policies have been amended, we set out further comments.

Site Allocation Comments

Strategic Policy SD03: Honiton and its development allocations propose to allocate the above site – Land at Kings Road, Honiton (Honi_18) – for residential development of 136 new homes.

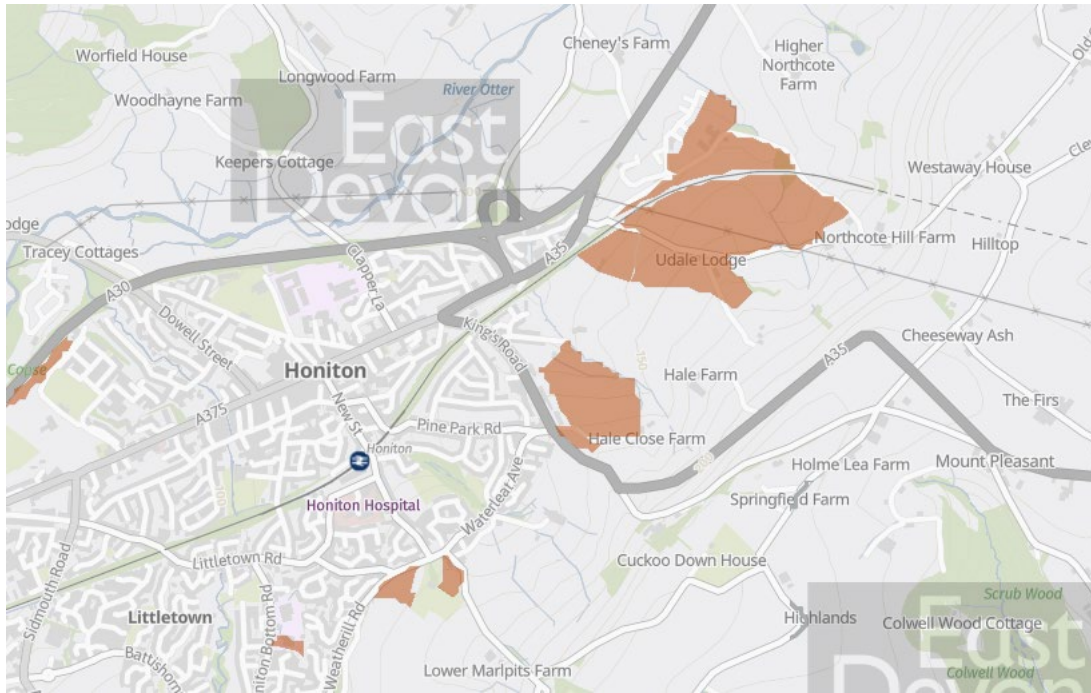
The full policy text and allocation map as amended in the Second Stage Reg 19 draft are included in full below:

Land at Kings Road (Honi_18)

This land is allocated for 136 homes and will form a medium-scale residential extension on the eastern side of Honiton. Development proposals would need to consider a crossing of Kings Road to provide access to bus stops on Waterleat Avenue. The development will also need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

The site is adjacent to the Blackdown Hills National Landscape and development should be informed by detailed assessment and design work to maximise opportunities to conserve and enhance the natural beauty of the site and its wider national landscape setting. The scale (particularly height), design, lighting and materials of new development should be appropriate to the Blackdown Hills National Landscape.

The site is also adjacent to the grade II listed Copper Castle former toll house and associated grade II listed gates. These heritage assets form a legible entry point to Honiton and development should seek to conserve and enhance the significance of these assets. The higher ground to the south of the site should be kept open, and the proposed junction carefully located and designed to protect landscape and heritage interests.



Our client continues to fully support the allocation of the site for residential development but does have some concerns with the additions to the policy as follows:

National Landscape Impacts

The relationship of the site to the National Landscape (NL) is fully appreciated and it is acknowledged that this relationship will be an important consideration for the future layout and design.

However, the additional paragraph that has been added to the policy by requiring development to “conserve and enhance” the natural beauty of the site and its wider national landscape setting does not fully align with the NPPF¹ and NPPG².

The NPPF Para 189 is clear, requiring that *“development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”* (The current draft NPPF repeats this distinction).

The NPPG builds on the above. Paragraph: 041 (Reference ID: 8-041-20190721) identifies the need for development within a NL (previously referred to as ‘Areas of Outstanding Natural Beauty’ within the NPPG) to be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. However, the bar is set lower for developments that are not within, but within the setting of a NL, as in the case of this

¹ [National Planning Policy Framework](#)

² [Natural environment - GOV.UK](#)

site NPPG Paragraph: 042 (Reference ID: 8-042-20190721) instead states that developments within the setting "*need sensitive handling*" to take potential impacts into account.

It also noted that there is an element of inconsistency with how this matter is addressed in the other proposed Honiton allocations:

- Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) – falls partly within the NL but has the same wording that has been added to Honi_18.
- Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07) – falls wholly within the NL but only references the "the scale, design, lighting and materials of new development being appropriate to the Blackdown Hills NL".
- Land at Middle Hill, Church Hill (Honi_13) – falls wholly within the NL but has the same wording as Honi_07.
- Land south of Northcote Hill – south of the railway (GH/ED/39b) – is outside of but within the setting the NL but has combines the wording used in both Honi-18 and Honi-07.

While the importance of the NL is fully recognised how these polices are worded in terms of the approach to development within the NL as compared to development within the setting of NL should be distinguished and consistent.

Heritage Impacts

The relationship of the site to the Grade II listed Copper Castle toll house and associated gates is fully appreciated and it is acknowledged that this relationship will be an important consideration for the future layout and design.

However, the additional paragraph that has been added is considered overly prescriptive in terms of the significance of the asset and how the scheme should address the asset through directing what type of development should be carried out within its setting. This should instead be informed by a proportionate Heritage Assessment which could identify a different but nonetheless acceptable approach, but which would be precluded by the strict policy wording.

Requested Changes

The following further changes are therefore requested to the site allocation (deleted text struck through and new text underlined in red

This land is allocated for 136 homes and will form a medium-scale residential extension on the eastern side of Honiton. Development proposals would need to consider a crossing of Kings Road to provide access to bus stops on Waterleat Avenue. The development will also need to maximise opportunities

for localised improvements/contributions to enhance sustainable travel modes.

The site is adjacent to the Blackdown Hills National Landscape. ~~and development should be informed by detailed assessment and design work to maximise opportunities to conserve and enhance the natural beauty of the site and its wider national landscape setting. The scale (particularly height), design, lighting and materials of new development should be appropriate to the Blackdown Hills National Landscape. Development proposals should therefore be sensitively handled, informed by detailed assessment and design work to avoid or minimise adverse impacts on the designated area.~~

The site is also adjacent to the grade II listed Copper Castle former toll house and associated grade II listed gates. ~~These heritage assets form a legible entry point to Honiton and development should seek to conserve and enhance the significance of these assets. The higher ground to the south of the site should be kept open, and the proposed junction carefully located and designed to protect landscape and heritage interests. The development should seek to conserve and, where possible, enhance the significance of these assets. The design of the proposed development, including the design and location of the proposed access junction, should respond to the topography of the site and the significance of the heritage assets.~~

Policy Comments

Obsidian reiterates their support for the aspirations of the plan to raise standards and deliver high quality development and good design and the need to assess and mitigate the impacts of development, subject to the following caveats:

- All proposed local policies must meet the NPPF tests of soundness by being Positively Prepared, Justified, Effective, and Consistent with National Policy.
- Potential impacts on viability and deliverability must be properly understood.
- Policies should not seek to unnecessarily replicate the NPPF or Building Regs (or other regulatory regimes).
- Policies should not be drafted in such a way that they hinder or discourage development.
- Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations.

Consultation Draft NPPF (December 2025)

It is acknowledged that the 2nd Reg 19 draft LP will be examined against the provisions of the NPPF December 2023. However, the direction of travel of the current draft NPPF is material insofar as the national DM policies contained in the consultation draft NPPF will prevail if there is a conflict with Local Plan policies. There seems little point in finding local plan policies sound that we already know will ultimately attract only limited weight in

the planning balance if/when the new NPPF is published – which is likely to be before the examination of this plan. A prime example of this is the proposed blanket 20% BNG requirement on all sites, as set out in Strategic Policy PB05: Biodiversity Net Gain (BNG).

General Policy Comments

Local Plan Vision Statement

All previous comments regarding the lack of references in the Vision Statement to meeting development need, and in particular housing need, remain valid

Housing Targets / Delivery

The proposed housing targets and stepped trajectory have not been amended and so our previous comments regarding the validity of this approach remain valid.

The identified 'headroom surplus' for housing supply has increased to 12.18% but this is due the accounting period being adjusted to 2025 rather than additional allocations being identified. The previous comments and concerns about the identified number and stepped trajectory remain and it is considered a 20% buffer would be more robust and in line with national policy.

While paragraph 3.8 has been amended to identify that the plan will be reviewed/updated if housing delivery falls short or future housing needs change, this is not considered sufficiently robust or clear as to how and when this would take place.

The previous comments about the apparent conflict between Strategic Policy HN02 (Affordable Housing), and Policy SP06 regarding the certainty of windfall development also remain valid.

Viability

It is noted that financial implications of the Building Safety Level are now addressed in Viability Addendum.

Specific Policy Comments

All previous comments on the following policies requesting either amendments or deletions and which have not been implemented remain valid:

- Strategic Policy HN01: Housing to address needs
- Policy HN03: Housing to meet the needs of older people
- Policy HN05: Self-build and custom build housing
- Strategic Policy PB07: Ecological enhancement and biodiversity in the built environment
- Policy PB08: Tree, hedges and woodland on development sites



The following policies have been amended and further comments are provided:

CHAPTER	CHAPTER 8. MEETING HOUSING NEEDS
Policy	Policy HN04: Accessible and adaptive housing
Comment	<p><u>50% M4(2)</u></p> <p>While we welcome the reduced requirement for M4(2) standards down to 50% there would still be concerns with meeting this on some sites. Additionally, the added reference to “or higher standards” creates uncertainty and undermines the clarity of the policy.</p> <p>As set out previously many sites do not have suitable topography to fully meet the M4(2) standards, M4 (2) external parking standard has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality and for flat blocks this will require lifts which for occupiers and in particular RP’s would cause additional maintenance costs burdens.</p> <p>A more reasonable and achievable level would be 30%.</p> <p>It is also maintained that mandating M4(2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.</p> <p><u>15% affordable rent M4 (3) (a) or affordable homeownership M4 (3) (a) or (b)</u></p> <p>Reference to either M4 (3) (a) or (b) welcomed but need should be evidenced.</p>
Requested Amendments	<p>Point A:</p> <p>A further reduced percentage requirement (e.g. 30%) for M4 (2) dwellings would be more acceptable and reasonable.</p> <p>Delete “or higher standards than this” at point A</p> <p>Flats, 1 bed units, and self and custom build plots should be excluded entirely.</p> <p>Point D:</p> <p>M4 (3) a or b only where up to date evidence of need.</p>

CHAPTER	CHAPTER 13. OUR OUTSTANDING BIODIVERSITY AND GEODIVERSITY
Policy	Strategic Policy PB05: Biodiversity Net Gain
Comment	<p>The additional supporting text which refers to the “significant nature conservation assets” and “environmental designations” within East Devon are not considered sufficient justification for the higher BNG % being proposed as these assets and designations are protected through other mechanisms and polices in the draft EDLP.</p>



Requested Amendments	This policy should be deleted.
Policy	Policy PB09: Monitoring requirements for new planting schemes
Comment	<p>Deletion of the requirement for a financial bond supported but the requirements set out at A and B are still considered unnecessary for both the applicant and the Council.</p> <p>No evidence has been presented to demonstrate that the new requirements are necessary.</p> <p>This is a role for the Council as enforcement authority following the introduction of a standard landscape planning condition.</p>
Requested Amendments	The policy should be deleted.

SUMMARY

The above representations are submitted by CarneySweeney on behalf of Obsidian.

Site Allocation

Obsidian strongly supports the allocation of Land at Kings Road, Honiton (Honi_18) but submit that the allocation policy should be worded more positively to enable much needed houses to come forward.

Policies

There are a number of policies that impose technical and other standards that while entirely laudable, have not been properly evidenced or justified and as such are, in themselves, unsound. Cumulative these policies could hinder housing delivery by placing undue burdens on developers and landowners and affecting scheme viability.

We ask to be kept informed of next stages of consultation and also that we have an opportunity to participate in any public examination of this document.

In the meantime, should you have any queries please do not hesitate to contact us.



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Number – [REDACTED]

East Devon Local Plan 2020 to 2042

Regulation 19 Publication draft

Representations on behalf of Obsidian Strategic Asset Management

28 March 2025

Introduction

CarneySweeney acts for Obsidian Strategic Asset Management (Obsidian) in connection with Land at Kings Road, Honiton, East Devon. This land is being promoted for residential development.

CarneySweeney submits the following representations on behalf of our clients.

Summary of our Representations

These representations focus on the following policies within the draft East Devon Local Plan 2020 to 2042 (draft EDLP):

Site Allocation

- Strategic Policy SD03: Honiton and its development allocations

Policies

- Strategic Policy HN01: Housing to address needs
- Policy HN03: Housing to meet the needs of older people
- Policy HN04: Accessible and Adaptable Dwellings
- Policy HN05: Self-build and custom build housing
- Strategic Policy PB05: Biodiversity Net Gain
- Strategic Policy PB07: Ecological enhancement and biodiversity in the built environment
- Policy PB08: Tree, hedges and woodland on development sites
- Policy PB09: Monitoring requirements for new planting schemes

Policy Context for Plan-Making

Provisions for plan-making are set out within the NPPF and NPPG. Plan makers are required to take account of the following points when preparing their Local Plan,

Under the transitional arrangements of the December 2024 NPPF, the new Local Plan will be considered under the provisions of the December 2023 NPPF.



National Planning Policy Framework (December 2023)

- Paragraph 31 states that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be ...focussed tightly on supporting and justifying the policies concerned and take account of relevant market signals.”
- Paragraph 35 identifies the tests of soundness as being:
 - a) Positively prepared: As a minimum, seeking to meet the area’s objectively assessed needs and informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with sustainable development.
 - b) Justified: An appropriate strategy based on taking account of reasonable alternatives and proportionate evidence.
 - c) Effective: Deliverable, based on effective joint working on cross-boundary strategic matters, evidenced in a Statement of Common Ground.
 - d) Consistent with national policy.

Site Allocation Comments

Strategic Policy SD03: Honiton and its development allocations proposes to allocate the above site – Land at Kings Road, Honiton (Honi_18) – for residential development of 136 new homes.

Site Promotion History

The site was first promoted in response to the Further Draft Local Plan Consultation in June 2024 and subsequently considered by Strategic Planning Committee (SPC) on 29 October 2024 which resolved to allocate the site for about 136 homes, subject to confirmation from National Highways that the principle of an access can be achieved.

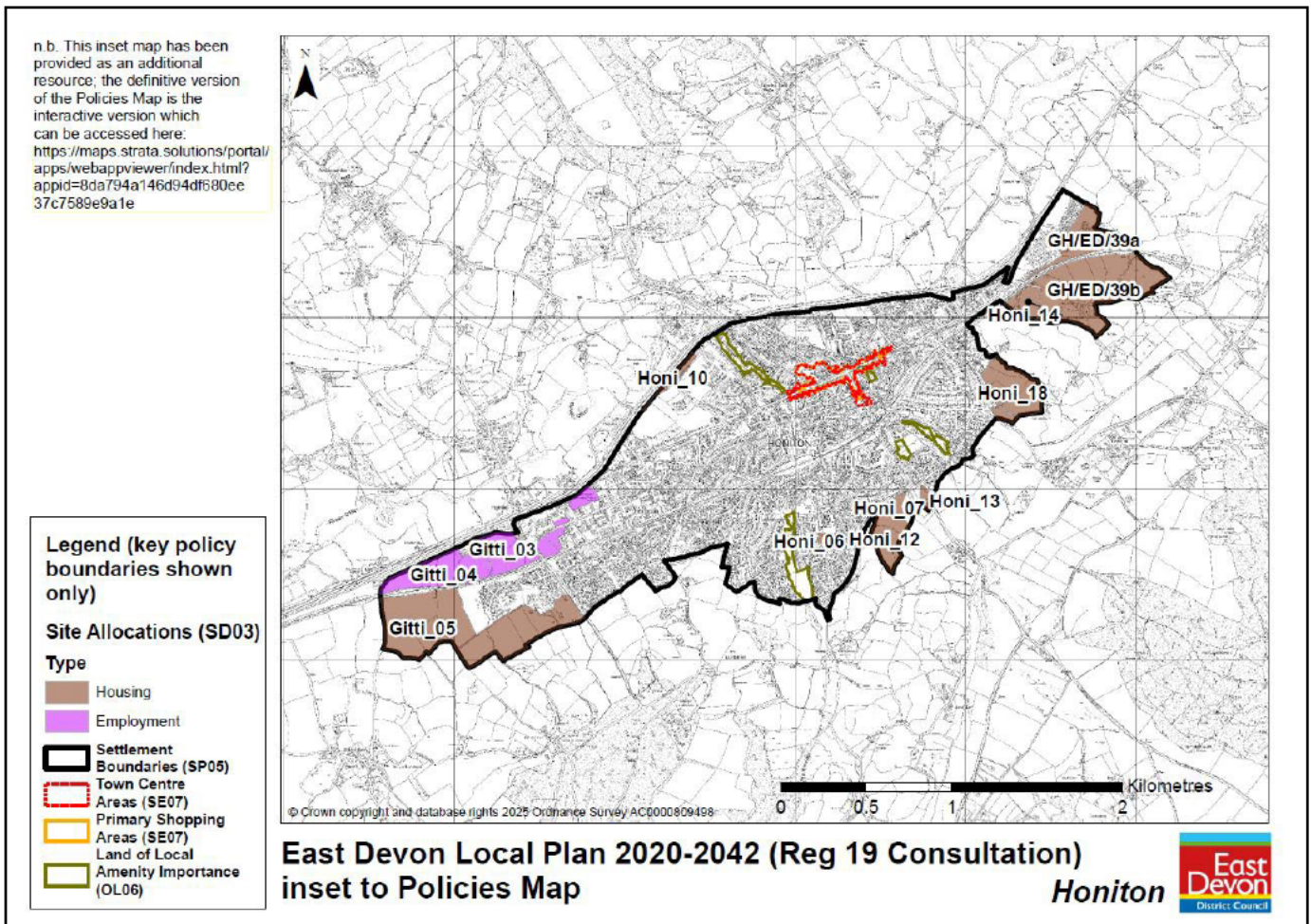
Prior to the final SPC meeting on 11 December 2024 to agree all proposed allocations ahead of the Regulation 19 consultation, confirmation was provided that an acceptable site access could be achieved following further discussions with DCC Highways, National Highways and the Police. The site was subsequently recommended for allocation



The full policy text and allocation map are included in full below:

Land at Kings Road (Honi_18)

This land is allocated for 136 homes and will form a medium-scale residential extension on the eastern side of Honiton. Development proposals would need to consider a crossing of Kings Road to provide access to bus stops on Waterleat Avenue. The development will also need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.



Our client fully supports the allocation.

Spatial Strategy

Honiton is appropriately classified as a Main Centre and has an extensive range of services and facilities such that it has strategic significance as a location for higher levels of future housing development of the scale proposed in the emerging Local Plan.



Access

The appended Highways Technical Note summarises the key highway discussions that have taken place regarding the site access. This demonstrates that a safe and acceptable site access that meets relevant standards can be secured with connection to the existing footways along Kings Road to provide pedestrian access into the town. The note also confirms that the identified Kings Road crossing can be provided.

The site is sustainable located in relation to the town with Honiton train station, providing links to Exeter, Axminster, Salisbury and London, located just 800m west of the site, with Honiton hospital and surgery immediately to the south of the train station. There is also an existing bus stop adjacent to the site at Kings Road and as referenced in the policy bus stops on Waterleat Avenue providing regular local services. Services and facilities along the High Street are within 0.6 miles of the site and schools, recreational facilities and the leisure centre are all within 1 mile of the site.

Environmental Designation

Although the land lies adjacent to a National Landscape, the site itself is not subject to any statutory environmental designation.

The site is located to the east of Honiton, outside but adjacent to the current settlement boundary. The land also lies adjacent to the East Devon and Blackdown Hills National Landscapes.

While indicative at this stage the Concept Design has been prepared to provide a sensitive development that allows for a new edge of settlement built form that is appropriate to its setting with significant areas of open space and landscaping around the periphery of the development to assist with the assimilation to the National Landscape, whilst also providing sustainable urban drainage and biodiversity net gain benefits.

An illustrative concept plan demonstrating how the site could be developed is appended.

Tree Cover

There is very limited tree cover on the site, and it would be expected that the existing trees could be retained in situ as part of any development proposal. Within the site are two field boundary hedgerows and the concept plan demonstrates that these hedgerows could be retained and enhanced, forming a central part of a scheme by lining the proposed main street.

Contamination

The site has been in agricultural use and there are no known contaminants on the site at this stage of investigation.



Infrastructure

Following a preliminary review of the site and its opportunities and constraints, it is expected that the site can comfortably accommodate the identified allocation numbers. As set out above a new highway access will be required off the A35 which is envisaged to be a right turn lane junction.

The site is suitable for development of market homes and affordable homes in line with emerging policy contained within the East Devon Draft Local Plan.

Deliverability

The site under the control of a willing landowner, as evidenced by the active site promotion undertaken to date, such that it can come forward for development early in the local plan period. Initial site assessment and feasibility work has not identified any constraints that would preclude development of the site.

While only preliminary design work has been carried out to date, this demonstrates that the site can readily accommodate the identified development quantum with a sensitive scheme appropriate to its edge of settlement setting. Significant areas of open space and landscaping can be accommodated around the periphery of the development area to assist with mitigating views from the adjacent National Landscape, whilst also providing sustainable urban drainage and biodiversity net gain benefits.

Policy Comments

The following section contains general and specific policy comments and follows the order of the draft plan.

Our client fully endorses good design and the need to assess and mitigate the impacts of development.

However, any proposed local policies must be justified with all potential impacts on scheme viability and deliverability being fully assessed. Policies should not seek to unnecessarily replicate the NPPF or Building Regulations (or other regulatory regimes) and should not be drafted in such a way that they hinder development. Where any standards or thresholds are set out there needs to be flexibility built into the policy to take account of site specific, technical feasibility and viability considerations.

General Policy Comments

Local Plan Vision Statement

It is notable that the Vision does not refer to the allocation and delivery of sufficient land to meet housing needs, reflecting section 5 of the Framework and the Written Ministerial Statements of 30 July 2024 (Angela Rayner MP) and 12 December 2024 (Matthew Pennycook MP), which are material considerations.



This indicates that the draft LP places higher priority on environmental considerations than on addressing the national housing crisis. Indeed, many of the policies and provisions reflect this imbalance.

It is considered that the Vision should be re-balanced to acknowledge the need to address the housing crisis by providing a choice of decent housing for all, and this new balance should then be reflected in the policies and provisions of the plan, in accordance with our representations.

Housing Targets / Delivery

Up to 2031/32, the Council indicate a trajectory to deliver 850 dwellings per year on average, with the remaining plan period from 2032/33 onwards to deliver an annual average of 1,070 dwellings per year. Whilst this averages out to provide for the required housing need, it means that for the first part of the plan-period, the LPA will be under-delivering against their identified housing need and more than likely unable to demonstrate a five-year housing land supply within the early parts of the plan-period, as evidenced by Appendix 1 of the Draft Local Plan. This approach appears to be at odds with the Framework, in particular, the requirement to “meet the area’s objectively assessed needs”.

It is, effectively, a workaround, where the LPA will only be delivering 70% of the housing requirement, which would be averaged out by delivery later in the plan period, for the Plan to continue to be assessed against the previous version of the Framework and therefore requiring 80% of the housing requirement to be planned for.

Elsewhere in the Draft Local Plan, notably in Strategic Policy HN02 (Affordable Housing), it is referenced that 35% affordable housing would be a target for windfall development outside settlement boundaries. This appears at odds with Policy SP06 which restricts development outside settlement boundaries, presenting concerns about the level of contribution that windfall sites will provide to meeting housing need. Paragraph 75 of the Framework is clear that there should be “compelling evidence” that windfall sites will provide a reliable source of supply. The current wording of Policy SP06 does not provide confidence that development on windfall sites will be a reliable source of supply.

In combination, the restrictive nature of Policy SP06, and the reliance of larger sites to deliver the required housing need later in the plan-period cemented by Policy SP02, presents the prospect of a deteriorating housing supply position from the point of adoption within the first half of the plan period. The Framework is clear that planning policies “should identify opportunities for villages to grow and thrive, especially where this will support local services”. The restrictive nature of Policies SP02 and SP06 is at odds with the clear intention of what the Framework is aspiring to achieve. Furthermore, the Framework is clear that strategic policies should provide for objectively assessed needs “as a minimum”.



Viability

The Three Dragons Viability Assessment does not appear to have taken account of the pending Building Safety Levy due to come into effect from Autumn 2026. The rate per sqm in East Devon is currently indicated to be £34.06/sqm so would be £3406 for each 100sqm open market dwelling.

This so would represent a significant additional cost that needs to be taken into account in assessing the viability of the local plan.

Specific Policy Comments

CHAPTER	CHAPTER 8. MEETING HOUSING NEEDS
Policy	Strategic Policy HN01: Housing to address needs
Comment	<p>While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing (SCB) raises concerns.</p> <p>General aims: E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this.</p> <p>Housing mix: D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).</p>
Requested Amendments	<p>Required change:</p> <p>General aim criteria E – No specific changes requested</p> <p>Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.</p>
Policy	Policy HN03: Housing to meet the needs of older people
Comment	<p>While the aim of increasing the amount of specialist accommodation is admirable the blanket requirement for all general housing schemes of 50 to 199 homes to provide 10% of dwellings as ‘specialist older person dwellings (C3)’ and for schemes of 200+ to provide 10% dwellings as ‘specialist older person dwellings (C3) and/or C2 equivalents’ is not supported.</p>



	<p>Firstly, it is not clear what is meant by ‘specialist older persons dwellings’ (and how this relates to the requirements of Policy HN04 discussed further below) or how the two threshold requirements differ. It is noted the Three Dragons Viability Assessment refers to 10% bungalows, but this is not what is set out in the policy.</p> <p>Secondly it is not reasonable to impose a blanket percentage requirement as the provision and composition of such accommodation should be based on evidenced need. Further for the C2 accommodation this would need interest from a care operator/provider which may not be available.</p> <p>While the reference to commercial viability is welcomed (noting the apparent conflict between the Viability Assessment and the policy as to what is meant by the policy) , mandating the provision of a percentage of older person housing where the earlier criteria listed at A – F in the policy may not be achievable (for example H - having flat topography) and/or place additional burdens on developers (for example F - the need for a Care Needs Assessment) is not reasonable.</p> <p>The cumulative costs of the provision of different housing tenures – older peoples housing, affordable housing, self build etc – must be properly assessed in terms of impacts on deliverability.</p>
<p>Requested Amendments</p>	<p>The policy should be amended as follows (new text underlined):</p> <p>Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are<u>will generally be considered as falling within</u> Use Class C3 (dwellings) <u>subject to information being provided regarding the level of care and facilities provided and the needs of the residents.</u></p> <p>The blanket requirement for a percentage of older persons housing should be deleted.</p>
<p>Policy</p>	<p>Policy HN04: Accessible and adaptive housing</p>
<p>Comment</p>	<p>The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns.</p> <p>As a starting point any higher standards needs to be evidenced, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility.</p> <p><u>100% delivery of M4 (2)</u></p> <p>This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:</p> <ul style="list-style-type: none"> • Many sites in the district including Honi_18, do not have suitable topography to fully meet the M4(2) standards.



	<ul style="list-style-type: none"> • M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing space for street trees/landscaping. The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density. • For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens. <p>Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.</p> <p><u>5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b)</u></p> <p>The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced.</p> <p>If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or(b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.</p> <p><u>Viability</u></p> <p>Regarding the Three Dragons Viability Assessment do the additional costings allowed for M4(2) _and M4(3) just address internal costs or do these costs take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites.</p>
<p>Requested Amendments</p>	<p>A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable. Flats, 1 bed units, and self and custom build plots should be excluded entirely. M4 (3) only where up to date evidence of need.</p>
<p>Policy</p>	<p>Policy HN05: Self-build and custom build housing</p>
<p>Comment</p>	<p>A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:</p> <ul style="list-style-type: none"> • Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para



3.4 identifies that even with a noted decrease in the number of consented plots “the supply meets both the ‘residual’ demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots.” As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

- This also notes that the most popular locations for SCB demand are Exmouth, Sidmouth, Budleigh, and Ottery St Mary. As such the evidence of need does not support this generic policy approach.
- If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.
- If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.
- Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.
- Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered.



	<p>The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required.</p> <p>Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is not requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.</p>
Requested Amendments	<p>A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.</p>

CHAPTER	CHAPTER 13. OUR OUTSTANDING BIODIVERSITY AND GEODIVERSITY
Policy	Strategic Policy PB05: Biodiversity Net Gain
Comment	<p>The requirement for at least 20% BNG is double the statutory requirement of 10%. It has not been justified in terms of any local evidence demonstrating a significant biodiversity deficit in East Devon or that the mandatory regime is not adequate. Reference is made in the support text to recent evidence suggesting “that a 10% BNG target without species management provides negligible gains” but this evidence is not cited. Reference is also made to the Nature Recovery Deceleration for East Devon committing to exceeding 010% BNG target but this is not set out in this document. As such, it is unjustified and unsound.</p> <p>Those proposals that cannot achieve 20% BNG will be required to submit viability appraisals. These will be costly and time consuming to produce and audit. They will place heavy resource and financial burdens on both applicants and developers and will at the very least delay housing delivery.</p> <p>The land take implication of increasing the BNG requirement does also not appear to have been assessed. For larger residential sites there is a real push to achieve the BNG mitigation on-site, as per the guidance and hierarchy. More land set aside for BNG mitigation will reduce the number of homes achievable on the allocations. While the cost of delivering the BNG mitigation might decrease proportionally, the reduction in units is a crucial element. Has the Council run any assessments on their allocated sites having for example a 5% reduction in unit numbers to account for the additional BNG land?</p> <p>The viability testing for the proposed 20% increase in the Three Dragons Viability Assessment, which estimates a per unit additional cost of £1,188 for greenfield sites and £321 for brownfield sites, is disputed. These figures are based on the MHCLG BNG Impact Assessment from 2019 but on reviewing this document it gives an estimated figure of £11,000 per offsetting unit which is significantly lower than current offsetting</p>



	<p>unit prices (which vary depending on the type of habitat but on average are around £25,000 plus per unit). This in turn casts doubt on the robustness of this earlier assessment as a basis for current costings.</p> <p>Policy PB05 requires a Biodiversity Statement to be submitted with planning applications. However, the submission requirements can be established through the national and local validation checklist. In any event, the Environment Act 2021 requires the submission of a BNG Plan with planning applications. It is not clear whether this is the same or different to a Biodiversity Gain Statement. The reference to the BS standard is superfluous.</p> <p>A Habitat Management and Monitoring Plan should be secured by planning condition, rather than be required to be submitted with the planning application.</p> <p>It is not clear how “locality” is defined in terms of off-site habitat creation. In any event, off-site BNG does not have to be close to the impact – it can be achieved through the purchase of Government credits or credits from habitat banks, which may or may not be close to the development site.</p> <p>In the final paragraph, should “consummate” be replaced with “commensurate”? This is a moot point because for exempt schemes, the Framework requires <i>a gain</i> to be achieved.</p>
Requested Amendments	This policy should be deleted.
Policy	Policy PB07: Ecological enhancement and biodiversity in the built environment
Comment	<p>The delivery of ecological mitigation for each development proposal should be based on site specific evidence submitted in connection with the relevant planning application.</p> <p>The blanket requirement for integrated bat lofts with all planning applications for major developments – irrespective of need or site suitability – is not justified.</p>
Requested Amendments	Omit reference to bat lofts.
Policy	Policy PB08: Tree, hedges and woodland on development sites
Comment	<p>Policy PB08 is entirely too prescriptive and onerous and unnecessarily repeats the provisions of British Standards. It will also add significant cost to the planning application process while the required details are prepared and submitted.</p> <p>The retention and provision of trees is embedded in good design, but flexibility is needed with tree impacts having to be balanced with other considerations, particularly the requirements of services and easements.</p>



	<p>Tree protection should be secured by a suitably worded condition, requiring the applicant to submit relevant details post-decision rather than with the planning application.</p> <p>Tree planting and maintenance is a detailed matter, and it is not appropriate for this to be controlled by a land use planning policy in a local plan.</p>
Requested Amendments	The policy needs to be significantly simplified.
Policy	Policy PB09: Monitoring requirements for new planting schemes
Comment	<p>The requirement for a developer to place a bond equal to 25% of the calculated scheme planting costs for all major developments is wholly unreasonable.</p> <p>The need for this has not been justified with reference to the normal methods of securing and managing landscaping – standard landscaping conditions, requirements for LEMPs, Section 106 landscape management – and the financial implications of this have not been tested in terms of scheme viability and the implications on housing delivery.</p> <p>Such a requirement is disproportionate on small major schemes and will be potentially significant for large major and strategic schemes and its implications on cash flow and wider scheme viability has not been assessed. This process will also place considerable additional administration burdens on both applicants and the Council where cashflow and resources are already stretched. The retention of the bond for what in effect will be 5 years after construction has been completed is unreasonable.</p> <p>A and B: These steps will introduce unnecessary steps for both the applicant and the Council. Again, no evidence has been presented to demonstrate that the new requirements are necessary. This is a role for the Council as enforcement authority utilising standard landscape conditions / Section 106 obligations.</p>
Requested Amendments	The policy should be deleted.

SUMMARY

The above representations are submitted by CarneySweeney on behalf of Obsidian.

Site Allocation

Obsidian strongly supports the allocation of Land at Kings Road, Honiton (Honi_18). Honiton is ideally placed to deliver significant growth, and the site is deliverable with no adverse impacts/technical issues identified that would preclude the site from coming forward.



Policies

There are a number of policies that impose technical and other standards that while entirely laudable, have not been properly evidenced or justified and as such are, in themselves, unsound. Cumulative these policies could hinder housing delivery by placing undue burdens on developers and landowners and affecting scheme viability.

We ask to be kept informed of next stages of consultation and also that we have an opportunity to participate in any public examination of this document.

In the meantime, should you have any queries please do not hesitate to contact us.

Our Ref – CSE2168

Name – Samantha Thomas – Associate Director

Email – samantha.thomas@carneysweeney.co.uk

Number – [REDACTED]



Obsidian Strategic Asset Management

Axminster Road, Honiton

SLR Project No.: 422.065122.00001

19 March 2025

Revision: V3

RE: REPRESENTATIONS TO REGULATION 19 (ACCESS ARRANGEMENTS)

1.0 Introduction

- 1.1 This note has been prepared regarding Site Honi_18 within Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042, in response to the Regulation 19 consultation of the Local Plan.
- 1.2 Site Honi_18 has been proposed for 136 residential dwellings, with access to be taken directly from the A35. The site location is shown in **Figure 1**. An initial access arrangement has been submitted as part of representations, which is attached at **Appendix A**.

Figure 1: Site Location



- 1.3 This note provides a chronology and overview of the access proposals, including details regarding engagement with National Highways (NH) and Devon and Cornwall Police. The note concludes that the site has an access scheme which is deliverable within the land ownership and highway boundary extent.
- 1.4 This note sets out that the site access would be compliant with the core transport tests of the National Planning Policy Framework (NPPF, 2024), including specifically paragraph 115b, which states:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

...

b) safe and suitable access to the site can be achieved for all users; “

- 1.5 The early engagement with NH and Devon and Cornwall Police demonstrates that the site can achieve access in accordance with paragraph 115b of the NPPF.

Policy Background

- 1.6 The site is included within the Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042, referred to as Land at Kings Road (Honi_18). The draft document states the following:

“This land is allocated for 136 homes and will form a medium-scale residential extension on the eastern side of Honiton. Development proposals would need to consider a crossing of Kings Road to provide access to bus stops on Waterleat Avenue. The development will also need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes”.

- 1.7 This note focuses on core access into the site from Axminster Road, with the initial access drawing provided subject to further refinement at the point of a planning application. At this stage, consideration can be given to crossing points across Axminster Road to bus stops on Waterleat Avenue. This will be in consultation with NH and Devon County Council (DCC), acting as the local highway authority. There appears to be sufficient carriageway width between the Waterleat and proposed access junction to deliver a pedestrian crossing within NH and DCC Highways adopted highway boundary.
- 1.8 In addition, the development will also demonstrate at the planning application stage that it will maximise opportunities for sustainable travel modes, in line with the core tests of the NPPF.

2.0 Access Scheme Overview

Access Setting and Speed Limits

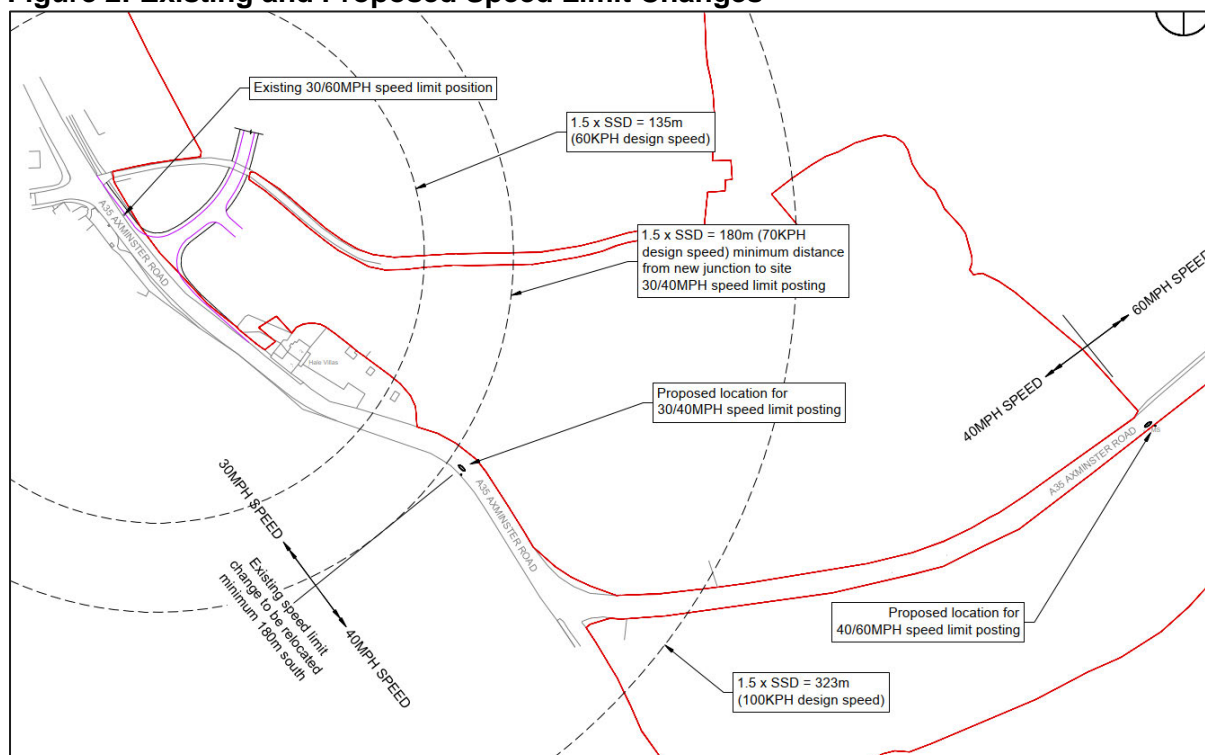
- 2.1 The development is located on the east side of Honiton to the north of the A35 Axminster Road. The proposed access is sited on the north side of the A35 mainline 50m east of



Waterleat Avenue. The A35 is subject to the national speed limit (60mph) which reduces to 30mph approximately 25m east of the Waterleat Avenue junction.

- 2.2 The proposed access is sited within the current 60mph zone. The mitigation proposes to relocate the 60mph speed limit approximately 170m east of the new access. Alongside this, a 40mph speed limit is proposed as a transition between the 60mph speed limit and the 30mph limit. The existing and proposed speed limit locations are shown in **Figure 2**.

Figure 2: Existing and Proposed Speed Limit Changes

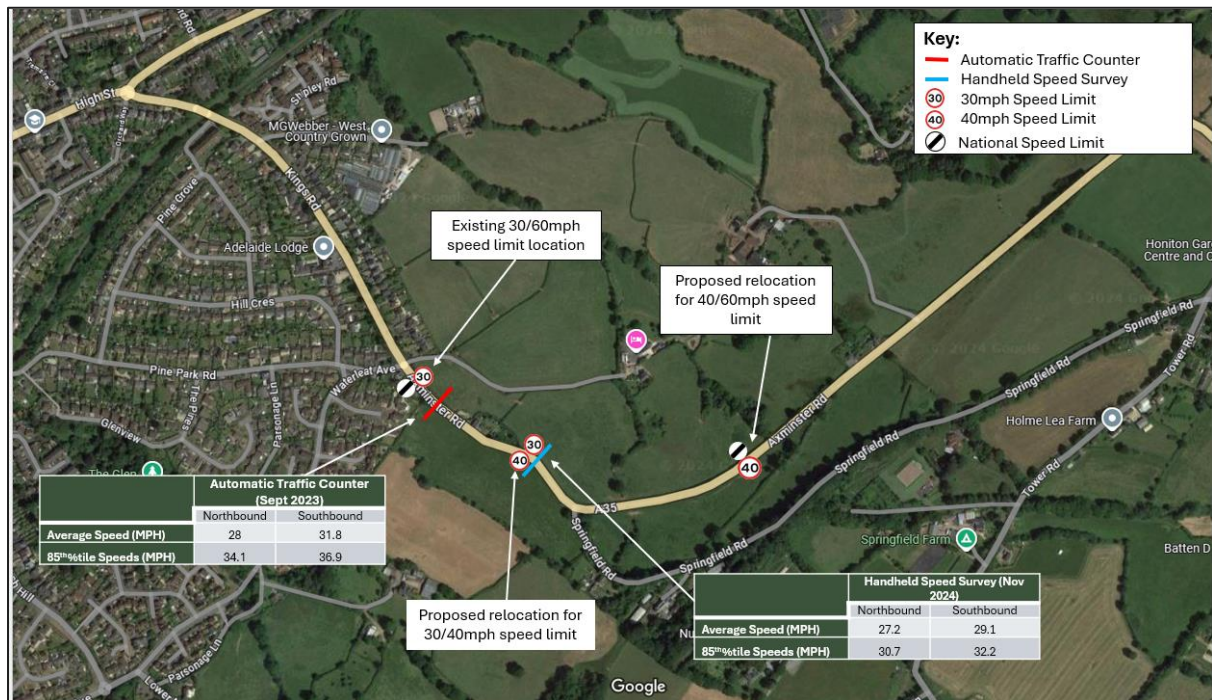


Evidence Base

- 2.3 To inform the access design and positioning of new speed limits, two speed surveys were undertaken; a 7-day automatic traffic counter (ATC) in September 2023, and a handheld speed survey in November 2024. The location of the surveys and the recorded speeds are shown in **Figure 3**.



Figure 3: Recorded Speeds and Proposed Speed Limit Locations



2.4 As shown in **Figure 3**, the existing speeds are in line with a 30mph speed limit. Therefore, it is appropriate to provide an access in accordance with a 30mph design speed.

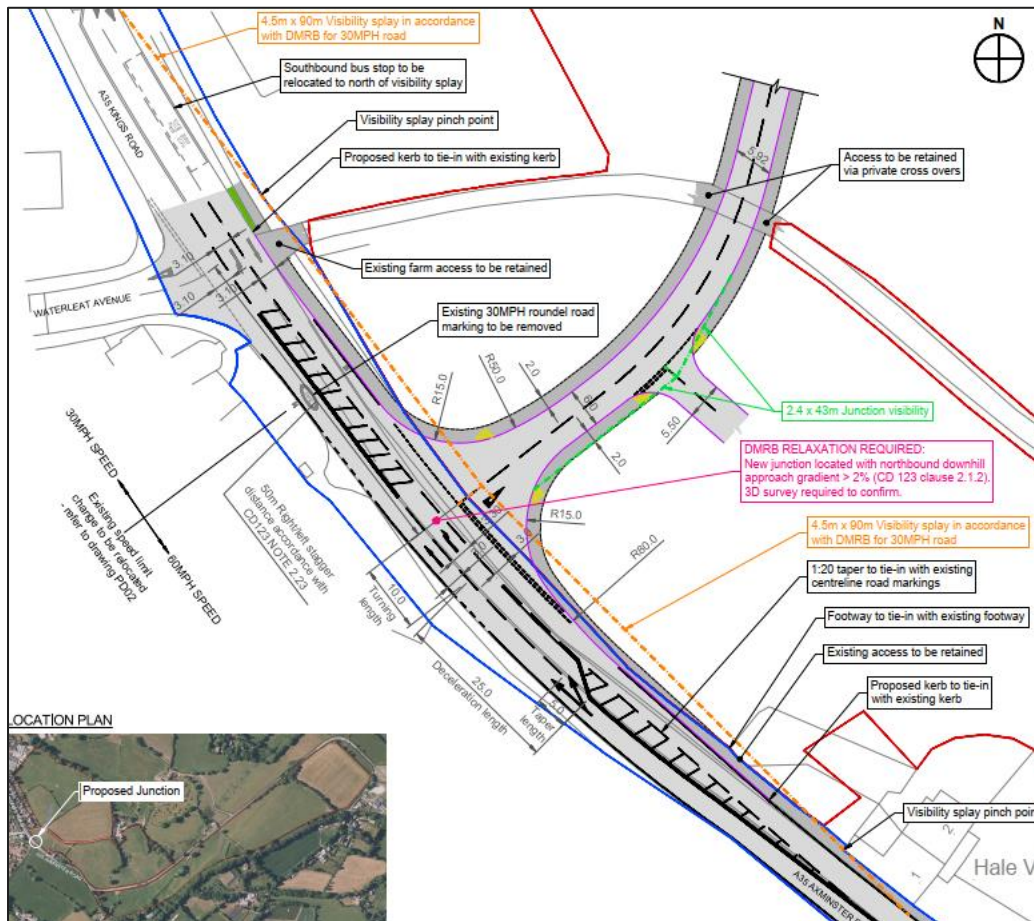
2.5 The development site will provide lighting, development frontage, a new junction and encompass the existing dwelling Hale Villas into the frontage. This will have a positive impact on speeds, as such the 85th percentile speed is likely to be lower than has been recorded, with the new streetscene urbanising the corridor and being reflective of a 30mph zone. The site forms a natural extension to Honiton, linking to existing properties and incorporating the existing speed limit, and therefore it is appropriate to provide a 30mph speed limit across its frontage.

Access Design

2.6 The access has been designed in accordance with Design Manual for Roads and Bridges (DMRB) principles. This is on the basis that the site access is located on the trunk road network (A35), managed by NH. The access design is attached at **Appendix A**, and an extract is provided in **Figure 4**.



Figure 4: Proposed Access

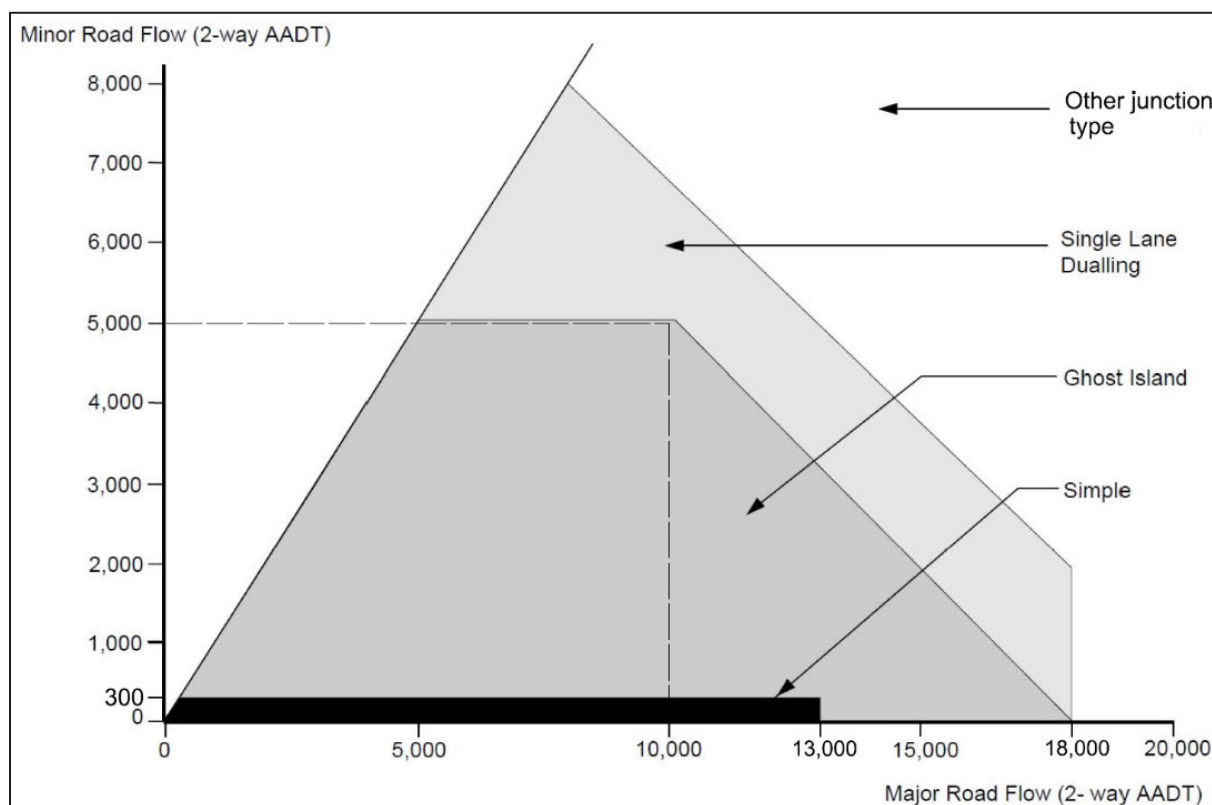


2.7 Whilst it is located along a trunk road, it should be noted that this section of the A35 is residential in nature, with numerous private drives and active frontage. Therefore, there is the opportunity to soften the scheme to improve placemaking and non-motorised user accessibility through the application process. The initial access designs have been undertaken to demonstrate that access can be achieved in accordance with core DMRB guidance, but it does not prohibit further design changes to provide a scheme which is more reflective of the residential nature of this section of the A35.

2.8 A ghost island right turn junction provides access to the site, with the junction form being determined by mainline traffic flow thresholds set out within Figure 2.3.1 of DMRB CD123, which is replicated in **Figure 5**. This is on the basis the September 2023 ATC demonstrating two-way Annual Average Daily Traffic (AADT) of around 15,000 traffic movements.



Figure 5: DMRB Junction Provision Thresholds



- 2.9 As shown in **Appendix A**, junction geometries have been produced in accordance with DMRB CD123, in accordance with the proposed 30mph speed limit past the site access.
- 2.10 The design includes a new internal junction to access a parcel of land to the immediate north of the A35 and identifies that the existing farm access to the north will be retained.

3.0 Access Design Process

- 3.1 The access design has been developed in coordination with both National Highways and Devon and Cornwall Police.

Consultation with National Highways

- 3.2 NH initially reviewed the access proposals and provided comment. An overview of the main points raised are noted below, alongside the subsequent SLR response.
 - NH Comment: The bus stop to the north needs to be considered in the junction design.
 - Response: The bus stop can be relocated at the application stage.
 - NH Comment: When a car is waiting at the private drive to the north, this would block visibility splays from the proposed access.
 - Response: Traffic joining the mainline may need to briefly wait for the private drive access vehicles to clear the sight line. This is a very brief infrequent event



where minor road traffic would yield momentarily until safe to exit. The designer does not view this scenario as an obstruction to junction visibility. Furthermore, the access scheme would enhance the visibility of existing private drive access points, which are currently limited, providing an overall betterment to their use.

- NH Comment: A reason should be provided why a 9.0m setback cannot be provided for the junction visibility splay.
 - Response: The 9m setback cannot be delivered within the highway or redline boundary. The permissible 4.5m splay is achievable.
- NH Comment: Gradient information should be provided to determine the vertical requirements of the access.
 - The vertical design will follow in due course at the application stage. 3D survey data will be acquired to confirm vertical geometry.
- NH Comment: ghost island junctions where no diverge or merge tapers are provided, the corner radii should be 15m followed by a corner taper of 1:6 over a distance of 30m.
 - Response: The drawing has been updated to reflect this requirement.
- NH Comment: NH may not support a reduction in speed limit to 30mph and therefore the design speed should be based on the 60mph speed limit with no relaxations to the design permitted. Consultation with the police should be undertaken to determine the likelihood of the speed limit being reduced.
 - Response:
 - As shown in **Figure 3**, the recorded speeds are in line with a 30mph speed limit currently, and therefore it is appropriate to design to these existing speeds.
 - A 40mph speed limit has been introduced as a transition between the 60mph speed limit and 30mph speed limit.
 - As discussed below, Devon and Cornwall Police have been contacted and would be supportive in the change of speed limit.

3.3 The main points raised by National Highways have been addressed, and therefore it is considered that agreement can be reached at the application stage regarding the site access.

Consultation with Devon and Cornwall Police

3.4 The proposals were issued to Devon and Cornwall Police for review, who made the following comment on 3rd December 2024:

“No objections from me on this, pushing the national out onto the straight section and installing a step down in speed, makes good sense and is far better than what currently exists, whereas it jumps from a national to a 30, which I never support. The relocation of the signs is fine and I would support these alterations.”

3.5 The full correspondence is attached at **Appendix B**.

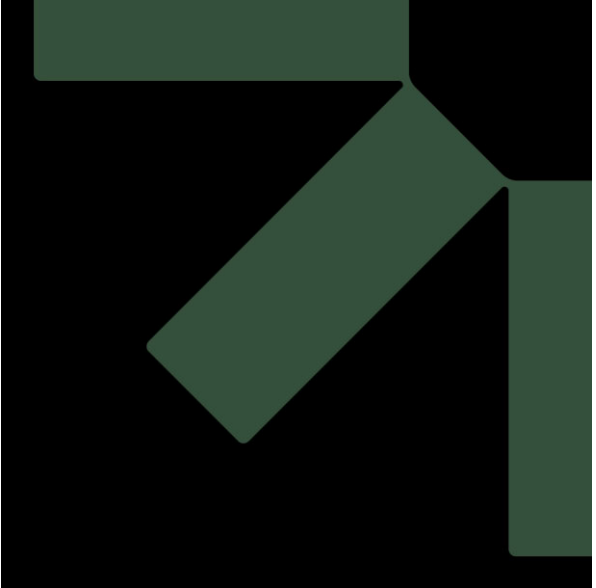


- 3.6 Devon and Cornwall Police have provided confirmation that the speed limit changes proposed as part of the access design are acceptable from an enforcement perspective, and furthermore provides an overall betterment by providing a step down in speed to 40mph prior to transitioning to a 30mph zone.

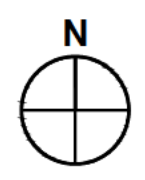
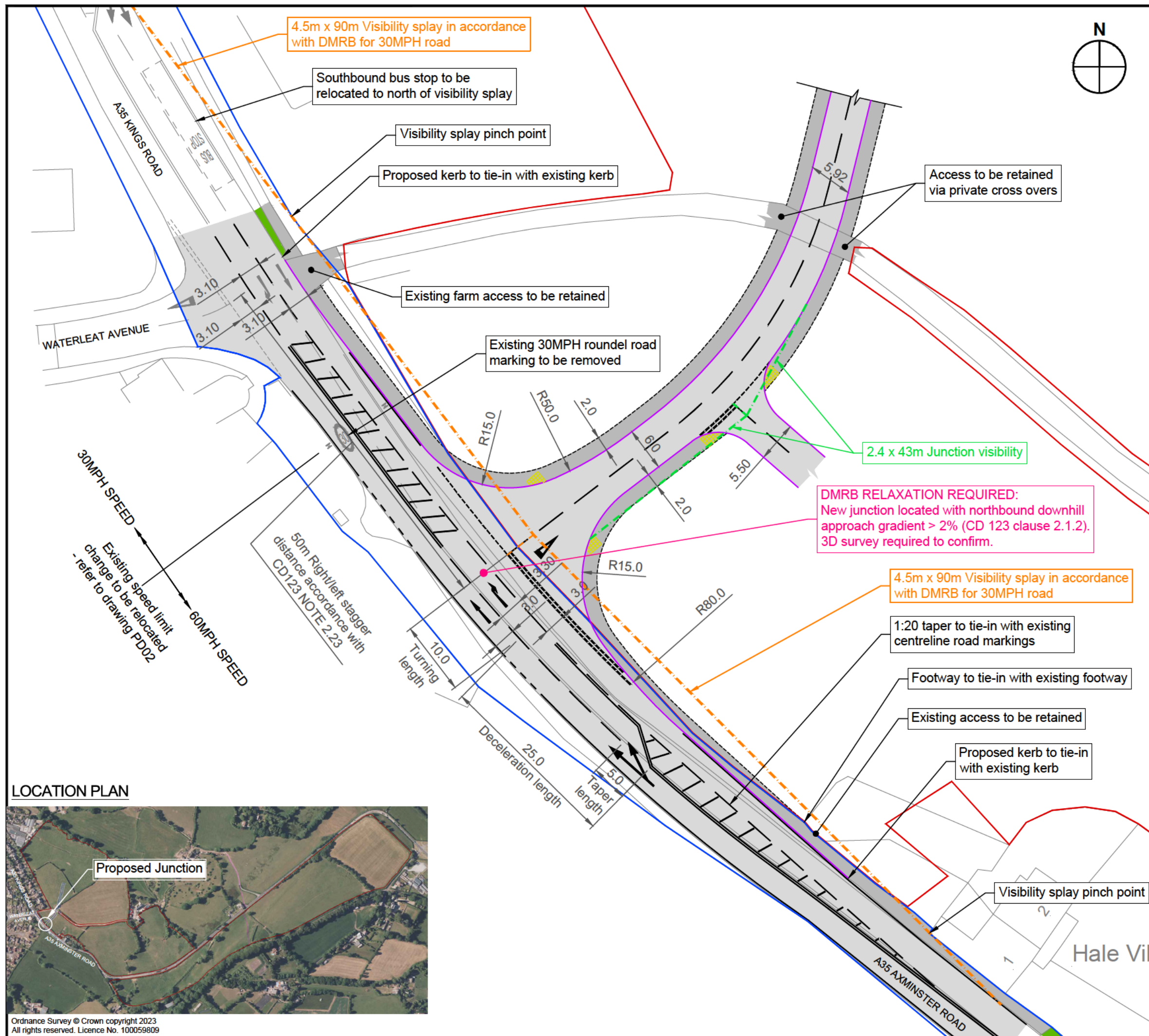
4.0 Summary and Conclusion

- 4.1 This note demonstrates there is a deliverable access scheme to serve the potential allocation of 136 dwellings at Axminster Road, Honiton, which has been identified in the draft East Devon District Council Local Plan (2020-2040). The access scheme can be delivered within the ownership and allocation boundary.
- 4.2 There has been extensive engagement with National Highways, who manage the A35 (Axminster Road), to provide a scheme in line with their design requirements. In addition, Devon and Cornwall Police have confirmed that they would be supportive of a change in speed limit to support the access design, which would better reflect the existing speeds.
- 4.3 The level of detail provided at this stage of engagement would typically be undertaken at the application stage, and therefore the development site can provide a suitable access strategy at the planning stage without protracted negotiations.
- 4.4 The engagement with NH and Devon and Cornwall Police demonstrates that the Honi_18 site can achieve access in accordance with paragraph 115b of the NPPF.





Appendix A



Notes:

- This is not a construction drawing and is intended for illustrative purposes only.
- The proposed mitigation for the new junction is based on the approval for amending the speed limit posting locations with a 40mph transition section.

Key

- Land title as per Title Plan DN569466
- Interpreted National Highways Boundary Extent
- Proposed kerb
- Proposed edging kerb
- Proposed tactile paving
- Carriageway
- Footway
- Verge
- 4.5 x 90m Stopping Sight Distance (60kph)
- 2.4 x 43m SSD (Manual for Streets)

B	Changes post NH comments 1/11/24	DLB	JCW	4.11.24
A	Highway extent added	LJ	JCW	27.10.23
REV.	DETAILS	DRAWN	CHECKED	DATE

STATUS:

INFORMATION ONLY

CLIENT:

PROJECT:
Axminster Road, Honiton

DRAWING TITLE:
Proposed A35 Central Treatment with Ghost Island Junction

SCALES:
1:500 at A3

DRAWN: NS	CHECKED: JM	DATE: 18.09.2023
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SLR

DRAWING NUMBER: 237534/PD01

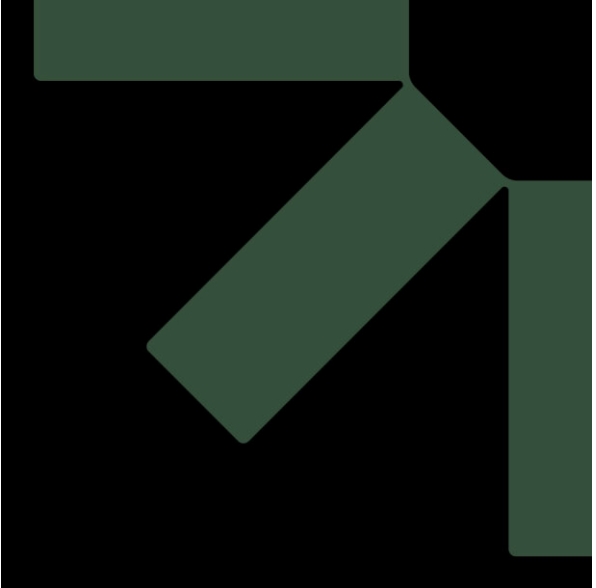
REVISION: B

LOCATION PLAN



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Appendix B

Jack Clarke-Williams

From: WALSH Tim 10592 [REDACTED]
Sent: 03 December 2024 07:35
To: Jonathan Lloyd
Cc: Sam Luk; Simon Coles; Jack Clarke-Williams
Subject: RE: East Devon Local Plan Review - Proposed site allocation Hon 18

Jon - good morning

I've come in early to look over these plans.

No objections from me on this, pushing the national out onto the straight section and installing a step down in speed, makes good sense and is far better than what currently exists, whereas it jumps from a national to a 30, which I never support. The relocation of the signs is fine and I would support these alterations.

Hope this is helpful and thanks for sending it across

Tim WALSH

Tim WALSH 10592 - Motor Patrol Constable
Road Casualty Reduction Officer East and Mid Devon
Alliance Roads Policing Unit - Exeter

Email: 10592@devonandcornwall.police.uk
Address: Exeter Police Station, Sidmouth Road, Exeter, Devon, EX2 7RY



From: Jonathan Lloyd <Jonathan.Lloyd@slrconsulting.com>
Sent: Tuesday, December 3, 2024 7:24 AM
To: WALSH Tim 10592 [REDACTED]
Cc: Sam Luk [REDACTED]; Simon Coles <simon.coles@carneysweeney.co.uk>; Jack Clarke-Williams <Jack.Clarke-Williams@slrconsulting.com>
Subject: RE: East Devon Local Plan Review - Proposed site allocation Hon 18

Good morning Tim,

In order to expedite information to East Devon District Council, I've copied in Sam Luk who is helping prepare the committee report for EDDC which is due tomorrow, and also our planning consultant Simon who is assisting Sam in our inputs on the site.

While I can't make a call until 2pm, I've provided my colleague Jack's details below, he knows the scheme well and can field any questions you might have before 2pm if that would help?

Jack Clarke-Williams





- LEGEND**
-  Site boundary
 -  Primary access
 -  Public Right of Way (PRoW)
 -  Primary route
 -  Secondary route
 -  Tertiary route
 -  Footpath
 -  SUDS
 -  Swale
 -  Residential development
 -  Public Open space (POS)
 -  Key building frontage
 -  Key building
 -  Existing tree
 -  Proposed tree
 -  LEAP
 -  Grade II Listed Building
 -  Wildflower meadow

Carter Jonas

PROJECT TITLE
**OBSIDIAN STRATEGIC
 LAND AT HALE CLOSE, HONITON**

DRAWING TITLE
CONCEPT PLAN

ISSUED BY	London	T: 020 7016 0720
DATE	March 2025	DRAWN OT
SCALE@A3	1:2500	CHECKED MH
STATUS	Draft	APPROVED JC

DWG. NO. P23_096_002_V4

No dimensions are to be scaled from this drawing.
 All dimensions are to be checked on site.
 Area measurements for indicative purposes only.

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