

Boyer

EDDC Second Regulation 19 Consultation: Representations

Land at Northcote Hill, Honiton

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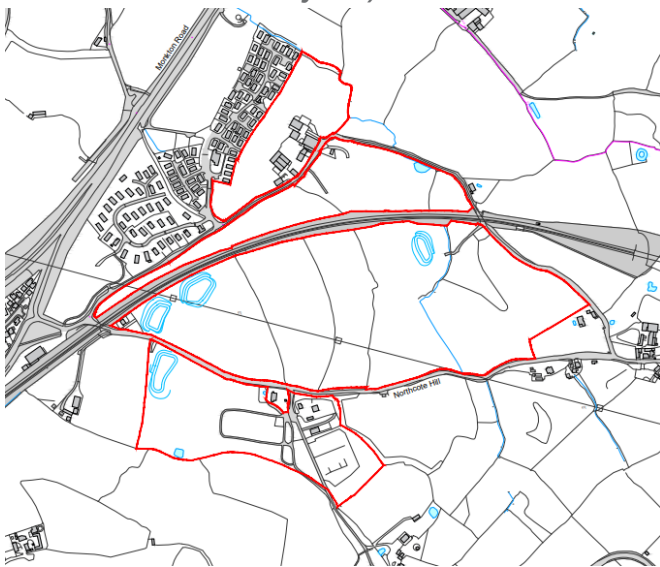
APPENDICES

- Appendix 1. 333102063 BL-M-03L Illustrative Masterplan**
- Appendix 2. 20424 BL-M-06H Illustrative Masterplan 2500-A3**

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Taylor Wimpey UK Ltd, in response to the East Devon District Council (EDDC) Local Plan (Second Regulation 19) Consultation Document (hereafter referred to as the “Draft LP”), in promotion of land at Northcote Hill, Honiton (the site).

Figure 1.1 Extract from the Site Location Plan, illustrating land at Northcote Hill (north and south of the railway line)



- 1.2 Representations have been previously submitted as part of EDDC’s Regulation 18 Consultation undertaken in 2022, the second Regulation 18 Consultation in 2024, and the Regulation 19 Consultation undertaken in February 2025.
- 1.3 It should be noted that these representations respond only to the amendments made to policies as part of this Second Regulation 19 Consultation. As a result, these representations must be read alongside the representations Taylor Wimpey made to the previous Regulation 19 Consultation which took place in March 2025.

Land at Northcote Hill

Regulation 19 Draft Allocations (GH/ED/39a and GH/ED/39b)

- 1.4 Taylor Wimpey is promoting land at Northcote Hill. The site is dissected by the East Devon Railway Line into two parts, north of the railway line and south of the railway line. It is welcomed that both parts have been identified as allocations for housing within the Draft LP:
- The land north of the railway line, which is proposed by the Council as a residential allocation of 115 homes; and referred to as ‘land north of Northcote Hill, north of the railway line’ (GH/ED/39a); and
 - The land south of the railway, which is proposed by the Council as a residential allocation of around 195 homes; and referred to as ‘land south of Northcote Hill, south of the railway line’ (GH/ED/39b).

- 1.5 Taylor Wimpey support the principle of both allocations; however, strongly consider that the number of homes proposed for the land south of the railway line (GH/ED/39b) must be further increased to 'at least 299 homes'. This increase is essential for ensuring that the allocation (and future scheme) makes effective use of the land and optimises its potential to accommodate an appropriate amount and mix of development as well as making a meaningful contribution towards meeting housing needs in East Devon (in accordance with NPPF 2023; Paragraph 135e).

Increasing the number of homes on land south of the railway line will enable the proposed development to provide much needed homes, the potential for a mobility hub and significant public open space. Together, GH/ED/39a and GH/ED/39b can deliver a sustainable new neighbourhood to the east of Honiton, providing at least 400 homes. In doing so, the proposed allocations would significantly contribute towards the Council's housing land supply, in accordance with the Council's spatial strategy.

- 1.6 Planning Applications for each site have been submitted to East Devon District Council. An update in relation to each of these is provided below.

Land north of the railway line (23/0331/MOUT)

- 1.7 Taylor Wimpey submitted an outline planning application for 115 dwellings and associated infrastructure on land north of the railway line in 2023. The application benefits from a resolution to grant at Planning Committee, which was obtained later in 2023, and a decision notice is due imminently.

Land south of the railway line

- 1.8 In December 2025, Taylor Wimpey submitted an outline planning application for up to 299 dwellings, open space and infrastructure on land south of the railway line. The application is awaiting validation.
- 1.9 This application was supported by a full suite of technical information, demonstrating that the site can accommodate up to 299 dwellings, whilst remaining sensitive to its landscape context. The proposed development was subject to pre-application engagement with Devon County Council as highways authority and East Devon Planning Team and Landscape Officer.
- 1.10 An illustrative masterplan depicting the proposed development is shown below.

Figure 1.2 Illustrative Masterplan



Supporting Documentation

- 1.11 These representations should be read alongside the concept masterplans, which have been informed by the site's technical surveys and assessments and support an increased quantum of development. These representations should also be read in conjunction with the full suite of technical information submitted in support of both planning applications on sites GH/ED/39a and GH/ED/39b.

Test of Soundness

- 1.12 These representations respond to the relevant draft Local Plan policies, with consideration given to the NPPF's tests of soundness:
- Positively Prepared;
 - Justified;
 - Effective; and
 - Consistent with National Policy

2. OBJECTIVES AND STRATEGIC POLICIES

Strategic Policy SP02 – Levels of future housing development

Affordable Housing Need

- 2.1 Supporting text for Strategic Policy SP02 has been amended to provide an update affordable housing need figure for East Devon between 2020-2040. Paragraph 3.10 confirms that the affordable housing need has increased from 4,070 affordable dwellings to 4,108 dwellings and an additional '1,170 homes for those in private rent but who aspire to home ownership and can afford discounted market housing products'. The affordable needs for the District should be accounted for as well as the Council justifying its approach to an affordable housing contingency.

Housing Need and Stepped Trajectory

- 2.2 "The Local Plan is being examined under the September 2023 NPPF, but benefits from the transitional arrangements introduced in the December 2024 NPPF, which allow plans that had reached Regulation 19 to proceed on the basis that they meet at least 80% of the Standard Method housing need. On this basis, the Council is entitled to set its minimum housing requirement at 80% of the 2023 Standard Method figure, and the housing requirement in Strategic Policy SP02 meets this minimum threshold.
- 2.3 However, the 80% figure represents a policy minimum and starting point, not a ceiling. There is no policy harm in planning for a higher level of housing provision where this can be sustainably accommodated. The latest Standard Method (May 2025) indicates an annual housing need of approximately 1,147 dwellings per annum, which better reflects current demographic and affordability pressures. As such, while the Plan satisfies the transitional minimum, the objectively assessed housing need is materially higher. To ensure the Plan is **justified** by the latest housing need, it must be genuinely **positively prepared** and responsive to the housing needs of the district."

Strategic Policy SP03 – Housing Requirement by Designated Neighbourhood Plan

- 2.4 We do not object in principle to Policy SP03, however have observed some discrepancies between the figures in this policy and those set out in Policy SD03 within the Second Regulation 19 Draft Local Plan.
- 2.5 Notably, the Honiton DNA housing requirement in Strategic Policy SP03 specifies 888 homes, while the Honiton allocations identified within Strategic Policy SD03 (Honiton and its development allocations) amount to 877 homes. It is unclear where the remaining 11 homes are proposed to be allocated given that Honiton Town are not actively progressing a Neighbourhood Development Plan.

Strategic Policy SP07 - Delivery of infrastructure

- 2.6 Taylor Wimpey acknowledge the removal of the need for new development proposals to support the '*wider community*' in terms of the delivery of infrastructure, ensuring that the draft policy wording is in accordance with National Policy is Guidance.

2.7 This policy is therefore supported.

Strategic Policy WS01: Development of Marcombe new community east of Exeter

2.8 Taylor Wimpey continues to have concerns regarding the Plan's delivery assumptions for the new settlement.

2.9 For this policy to be effective, the quantum of development delivered through Marcombe up until 2042 in this Draft LP should reflect a more justified delivery figure; and increase the capacity of existing housing sites allocated across East Devon within the Draft LP including uplifting the capacity at GH/ED/39b to at least 299 dwellings to ensure the housing requirement is fulfilled and the consistent delivery of homes throughout the Draft LP period.

Strategic Policy SD03: Honiton and its development allocations

2.10 Taylor Wimpey fully supports the Draft LP's recognition and identification of Honiton as a Tier 2 settlement and a sustainable location for future growth and development.

2.11 It is welcomed that land at Northcote Hill (north and south of the railway line) is identified as two draft allocations within the Draft LP (GH/ED/39a and GH/ED/39b). Taylor Wimpey supports the principle of these allocations and can confirm that both sites are suitable and available for development. Taylor Wimpey has submitted a planning application for each of these sites and are committed to their delivery. Both sites can contribute to the Council's immediate housing land supply.

2.12 We discuss each of these allocations in turn below.

Land south of Northcote Hill (north of the railway line) (site reference - GH/ED/39a)

2.13 The policy has been amended to increase the allocation from 100 dwellings to 115 dwellings. This increase is welcomed by Taylor Wimpey. An outline planning permission was resolved to be approved by EDDC's Planning Committee in 2023 for the development of up to 115 homes, public open space, sustainable drainage systems, landscaping, vehicular access via Tunnel Lane and associated highways improvements and infrastructure. A decision notice is due imminently.

Land south of Northcote Hill (south of the railway line) (around 195) (site reference – GH/ED/39b)

2.14 The Draft LP has uplifted draft allocation GH/ED/39b from 100 dwellings to around 195 dwellings. Whilst Taylor Wimpey supports the allocation of the site for residential development and the increase in allocation capacity, it must be reiterated that the site has capacity for at least 299 homes, and the draft allocation capacity must be increased accordingly. Taylor Wimpey has recently submitted an Outline Application for residential development up to 299 homes which is accompanied by a full suite of technical work (summarised in Section 4 of these representations) that confirms the site can comfortably accommodate a significantly higher quantum of development.

2.15 In preparation of the Outline planning application, Taylor Wimpey undertook a pre-application enquiry in relation to the proposed development of up to 299 homes. This engagement

included meetings with Devon County Council (DCC), as Highways Authority, East Devon Planning Team and Landscape Officer. The capacity of the site was discussed and DCC confirmed the access proposals and off-site works were acceptable. The illustrative masterplan was also discussed with the Landscape Officer who provided minor comments on the provision of additional tree planting, which was incorporated within the scheme prior to application submission.

- 2.16 Increasing the draft allocation to at least 299 homes would represent a more efficient use of land, with a development that could deliver significant areas of public open space, and other public benefits including a neighbourhood mobility hub. The enclosed concept masterplan demonstrates how a landscape-led development, with homes provided alongside extensive areas of public open space, including a new community park, can deliver at least 299 homes. There are no technical constraints that could impede the delivery of up to 299 homes on this site (GH/ED/39b).

Strategic Policy CC02: Net zero carbon development

- 2.17 Strategic Policy CC02 requires all new developments to demonstrate, at the application stage, that the relevant standards can be achieved. However, it should be recognised that such information, relating to detailed interior and exterior design, will only be available at the detailed design stage and is therefore unlikely to be available at the point of submission of an Outline Planning Application. Development should be required to meet energy efficient standards in accordance with building regulations or National Policy. There is no certainty that FHS will be bought in and therefore development should not be required to meet draft standards. At present, this policy is not justified.
- 2.18 To be considered sound, the policy text should be revised to reflect this limitation in the level of detail that can reasonably be provided at outline stage and that Building Regulations and National Policy sets the standards.

Strategic Policy CC05: Heat Networks

- 2.19 Strategic Policy CC05 is not justified or supported by sufficient robust evidence. Taylor Wimpey continue to object to this policy and suggest that draft Strategic Policy CC05 is removed from the Draft LP for the following reasons:
- At present the ability to access heat networks is outside of the control of the developer / landowner. As a result, this requirement is not justified for development.
 - Further work is needed to demonstrate that heat networks can be secured at an affordable price that would benefit from the same safeguarding as a domestic supply.

Strategic Policy AR01: Flooding

- 2.20 It is disappointing that the comments made during the previous Regulation 19 Consultation have not been addressed as part of this revised draft Local Plan. Taylor Wimpey continues to object to the following criteria within this policy, which is not effective and therefore unsound.
- 2.21 Criterion a) requires development proposed in a flood risk location from any source to demonstrate that there is no sequentially preferable location for development. Whilst it is

acknowledged that this Draft LP is likely to be examined against the previous NPPF (2023), planning applications will be determined against their compliance with the most up to date NPPF and NPPG. In respect of sequential tests (ST), these are only required to be undertaken in instances where build development/land rising/access or egress/internal road layout are located within areas at risk of flooding (from all sources). A ST is not required where POS is located within areas at risk of flooding. We consider that additional clarity is required to ensure this policy is not ambiguous to the decision-maker and therefore effective and sound.

- 2.22 Criterion c) requires *“ensuring that space is provided on all development sites for the inclusion of SuDS designed to reduce the volume and rate of runoff to less than greenfield rates, as informed by the ‘Sustainable Drainage System – Guidance for Devon’. Surface water run-off should be managed as close to the source as possible.”* The drainage guidance provided by DCC, however, states that there is no need for developments to deliver a lower greenfield run off rate.
- 2.23 The policy must be reworded accordingly, as currently worded it is not justified and not supported by proportionate or robust evidence.

Strategic Policy AR02: Water Quality and Efficiency

- 2.24 Strategic Policy AR02 has been amended to include a number of criteria that must be met in order to protect, manage and improve water quality in East Devon. Criterion C states that all homes must meet the optional Building Regulation G2 standards of 110 litres per day. Supporting policy text states that the water cycle study provides clear evidence for adopting the stricter standard of 110 litres per day in East Devon to address water stress.
- 2.25 The Water Cycle Study in the Evidence Base, however, states that the per capita consumption should be reduced to 122l/h/d by 2038 and 110 l/h/d by 2050. The policy should be reworded to state that the per capita consumption is 120 l/h/d, in accordance with the Draft LP evidence base.
- 2.26 Furthermore, East Devon is not classified as a water stress area, posing questions about the justification for imposing limits on water usage. Water consumption is a matter already covered by the Buildings Regulations Regime, making a specific plan policy on this matter unjustified.

Strategic Policy HN01: Housing to address needs

- 2.27 Taylor Wimpey continues to support the principle of Strategic Policy HN01 and the need for new developments and housing to meet existing needs. We welcome the recognition that up-to-date local housing need evidence assessments can be relied upon when assessing both existing and future housing needs.
- 2.28 *“Taylor Wimpey reiterate, however, that the Plan should seek to provide housing allocations sufficient to meet the full objectively assessed housing need for East Devon, rather than treating the minimum 80% Standard Method figure permitted under the NPPF transitional arrangements as a ceiling. While the housing requirement in Strategic Policy SP02 satisfies the transitional minimum, it represents only a starting point. The latest Standard Method*

indicates an annual housing need of approximately 1,147 dwellings per annum, which better reflects current demographic and affordability pressures. There is no policy harm in planning positively for a higher level of housing provision above the minimum, and doing so would reduce reliance on a small number of strategic sites and better ensure the Plan is genuinely positively prepared.

Strategic Policy HN02: Affordable Housing

- 2.29 This policy prescribes the affordable housing requirements required on all developments across East Devon. For site allocations within Honiton, affordable housing is set at 30%.
- 2.30 Taylor Wimpey notes that the affordable housing mix included is an aspiration and it welcomes this flexibility. Further clarity could be provided to confirm that any alternative mix proposed would be subject to evidence including local market information.

Strategic Policy OL01 – Landscape features

- 2.31 Strategic Policy OL01 states that development will only be permitted where the applicant is able to demonstrate that it will protect and enhance features and qualities that contribute to the character of East Devon’s landscapes.
- 2.32 The policy then identifies a number of landscape qualities, including land and water forms and pattern of settlement; important natural and man-made features (including topography, field boundaries, trees and woodlands, areas of importance for nature conservation, and rural buildings); adverse disruption of a view; and aesthetic and perceptual factors such as tranquillity, wildness, and dark skies. As the latter are characteristics rather than physical features of the landscape, the policy should be renamed to “*Landscape Features and Character*” to reflect its full scope.
- 2.33 Taylor Wimpey reiterates that, whilst the importance of several of the identified features and qualities is accepted, it is not considered that a failure to protect or enhance every existing feature, such as a single existing tree, should in itself be sufficient grounds to refuse permission for development. Development can, in many cases, deliver substantial new green and blue infrastructure (including a range of new planting), and can enhance positive landscape characteristics, both of which can secure a notable overall betterment to the existing landscape. The policy must be reworded accordingly.

Strategic Policy PB05 – Biodiversity Net Gain (BNG)

- 2.34 It is extremely disappointing that the changes requested by Taylor Wimpey as part of the previous Regulation 19 Consultation have not been made. As a result, Taylor Wimpey consider that Strategic Policy PB05 continues to be unjustified and is not supported by proportionate or robust evidence.
- 2.35 The requirement in the East Devon Draft LP for a 20% Biodiversity Net Gain exceeds the statutory expectation and is inconsistent with the approach set out in the emerging National Planning Policy Framework. The draft NPPF (2025), which, even under transitional arrangements, must be considered as a material consideration, proposes that local plans should not seek BNG contributions above the statutory requirement except in limited

circumstances, specifically where higher levels of gain can be robustly justified for particular allocated sites, and not as a blanket policy. The intention is to ensure that BNG is applied in a proportionate and consistent manner across local planning authorities, supporting nature recovery while maintaining viability and deliverability.

- 2.36 The BNG requirement within the emerging Local Plan must be aligned with the national policy position, and the imposition of a 20% BNG standard is not justified under the emerging NPPF framework. The policy must be amended accordingly.

Strategic Policy OS01 – Access to open space and recreation facilities

- 2.37 Whilst Taylor Wimpey support the principle of this policy and the need for new development to deliver new and enhanced high quality open space, it is disappointing that the concerns raised during the previous Regulation 19 Consultation have not been considered.
- 2.38 Taylor Wimpey continues to raise concerns to the policy's suggestion that all development must consider the provision of formal sports provision including changing provision, pavilions and other supporting facilities it will generate. It should be recognised that the provision of formal sports facilities should be driven by the site's location and context and local need, and not all sites are suitable for formal sports provision. The Plan must acknowledge that certain sites (due to their context and topography) are not suitable locations for accommodating formal sports provision. Sporting facilities can be delivered in other, informal ways, including the provision of outside trim trail equipment, circular walking routes, which can deliver similar benefits and provide opportunities for health and well-being to all. The policy must be reworded accordingly to recognise the need to consider formal sports provision on a case-by-case basis.
- 2.39 Land at Northcote Hill proposes to deliver areas of new public open space, which will be for the enjoyment of the existing and future residents of Honiton. This includes a large area of open space which will offer a variety of walking routes, informal recreation and biodiversity enhancements. The various areas of informal open space will contribute to the health and well-being of future residents. The proposals are landscape-led and informed by the site's context.

3. DEVELOPMENT MANAGEMENT POLICIES

Policy HN03 – Housing to meet the needs of older people

- 3.1 Taylor Wimpey continues to support the principle of Policy HN03, and the importance of providing housing that meets the needs of older people is recognised, given the evidence that there is a requirement for an increased number of units for older persons as a result of an ageing population across the District. However, Taylor Wimpey continue to have concerns regarding viability and the lack of consideration afforded to this in the consideration of this policy, as well as the specific locational requirements associated with specialist older persons housing.
- 3.2 It is acknowledged that, subject to commercial viability, housing proposals are required such that *“schemes for 200 or more dwellings should include at least 10% as on-site as specialist older persons dwellings as either C3 dwellings and/or C2 equivalents”*.
- 3.3 It is considered that the current policy wording is neither effective nor justified, as it does not adequately address the specific locational requirements of specialist housing (including, for example, proximity to town centres, or access to established public transport corridors). The policy, as currently worded, may result in such dwelling types not being suitable on certain major development sites. As drafted, the policy is therefore considered unsound. Taylor Wimpey continues to reiterate that the policy wording should be revised to make clear that older person’s units will only be required where there is an up to date evidence base, a demonstratable market demand (including the location being a suitable and desirable one for such a use), and where the provision of such units is viable.

Policy HN04 – Accessible and adaptable housing

- 3.4 Taylor Wimpey welcome the reduction from 100% to 50% of all new dwellings to meet the regulation M4(2) requirements or higher, however raise concerns over the uplift in the need of all new affordable homes to meet building regulation M4(3) (2) (a) or (b) requirements.
- 3.5 The increase in the requirement for all new affordable homes to meet building regulation M4(3) (2) (a) or (b) requirements from 5% to 15% raises concerns in regard to the viability of future developments.
- 3.6 The Local Plan Viability Assessment Addendum, published in November 2025, and sets out the considerations made during the previous Regulation 19 Consultation representations regarding viability. The assessment also consider changes made since the previous Local Plan Viability Assessment was published.
- 3.7 The assessment addendum identifies the Site (GH/ED/39b) as a Res7a site for 300 dwellings. The table below demonstrates the net in-combination impact from the reduction in M4(2) and the increase in M4(3) for typologies with affordable housing.

Changes to HN04 - cost reductions

	35% AH	30% AH	25% AH
Res3a	£4,733	£5,556	£6,380
Res3b	£4,733	£5,556	£6,380
Res3c	£7,482		£8,344
Res3d	£5,374	£6,106	£6,839
Res4a	£9,465	£11,113	£12,761
Res4c	£14,963		£16,688
Res4d	£10,748	£12,213	£13,677
Res5a	£27,196	£30,811	£34,425
Res6a	£54,392	£61,622	£68,851
Res7a	£108,784	£123,243	£137,703
Res8a	£290,089	£328,648	

- 3.8 The table demonstrates that development of 300 dwellings would result in a cost reduction of £123,243 as a result of the amendments made to the policy. Taylor Wimpey consider that this does not represent an accurate representation of reduction in cost for a development of this scale at the Site. The policy is therefore considered to be unsound, and further viability work should be undertaken to better represent the value of reductions.

Policy HN05 – Self-build and custom housing

- 3.9 This policy sets out the requirements for the provision of self-build plots within new residential schemes. The policy states that on sites of 20 or more homes, 5% of those homes are required to be serviced custom or self-build plots while on larger sites (250 homes or more), a portion of plots must be designated for affordable housing with all self-build plots.
- 3.10 The obligation that all self-build plots must be completed within 3 years of purchase being removed from the draft policy wording is welcomed, however, Taylor Wimpey continue to raise concerns over the stipulation that self-build plots must be marketed for a period of 24-months before being able to revert to 'normal' market housing. Taylor Wimpey reiterate that this is not reasonable. A development site may have been fully constructed and occupied within a 24-month period, and therefore the construction workers would have departed the site. It would not be reasonable for the developer to have to subsequently return to the development site to construct a small number of self-build plots that had no demand during the 24-month marketing exercise. As a result, it will be commonplace that development sites are left with unsightly undeveloped plots of land, which often delay the provision of cycle and pedestrian connections or play facilities within the site. The marketing period within this policy must be reduced to no more than 12-months.

Policy DS02 – Housing density and efficient use of land

- 3.11 The policy has been amended to include that developments of 50 or more dwellings, especially in or adjacent to a National Landscape, will be required to supported by a design code agreed with, or produced, by the Council as planning authority. It is considered that

requiring a design code for all major residential developments is disproportionate, and that such a requirement should be limited to larger schemes of at least 500 dwellings plus. It is also noted that there is no guidance on the expected content of a design code, which gives rise to concern that officers may seek an unreasonable level of detail as part of any such submission.

Policy TR04 – Parking standards and electric charging provision

- 3.12 The policy, which sets the parking standards for new development within the district, has been amended as part of the second Regulation 19 Consultation to include further reference to the provision of electric vehicle charging points. Part a) of the policy now states “*For residential developments... off-street and on-street parking spaces that are served by EV charging should aim to exceed Building Regulation standards*”. This is said to be in place to recognise the air quality concerns relating to the Pebbled Heaths SPA/SAC.
- 3.13 Taylor Wimpey, however, consider that this policy requirement is not justified for the remainder of the County, in particular for areas that are not within proximity of the Pebbled Heaths SPA/SAC.
- 3.14 The policy goes on to state that “*To address potential concerns in respect of Habitat Regulation compliance (and therefore to secure planning permission) developers should fully consider options to promote and secure uptake of high levels of use of electric vehicles by residents of new dwellings being built*”. This is not justified given that it is not the onus of the developer to secure that future residents own an electric vehicle. For the policy to state that these concerns should be addressed ‘*to secure planning permission*’ is not justified and the policy should be reworded in order to reflect this consideration and be in accordance with Building Regulations.

Policy TR06 – Digital Connectivity

- 3.15 It is disappointing that the previous concerns raised by Taylor Wimpey during the previous Regulation 19 Consultation have not been considered during this consultation. The Policy remains unchanged and remains to be unsound for the reasons outlined below.
- 3.16 Policy TR06 requires that all major developments provide access to terrestrial or satellite superfast broadband and high-quality communications.
- 3.17 However, this policy is overly restrictive, particularly for sites located in smaller or isolated communities where issues of practicality and viability are significant.
- 3.18 We consider that it is essential to reiterate that local planning authorities should engage with developers to assess the feasibility of delivering superfast broadband connections in proximity to the site. Such considerations should be proportionate, taking into account the scale of the development and the associated costs of any additional infrastructure required.

Policy PB03 – Protection of irreplaceable habitats and important features

- 3.19 Whilst Taylor Wimpey continues to agree that important hedgerows (as defined by the Hedgerow Regulations 1997) should be protected and their loss or degradation should only be permitted where the mitigation hierarchy has been applied and evidenced in earnest, it is

disappointing, however, that Taylor Wimpey's previous comments raised during the previous Regulation 19 Consultation have not been addressed.

- 3.20 Taylor Wimpey continue to object to EDDC's approach to applying the same protection and importance to 'species rich Devon hedges', which do not meet the criteria of 'important hedgerows'. We consider this approach is not justified.
- 3.21 Devon hedges are located across Devon and often along the perimeter of sites. As a result, it is often unavoidable to need to remove part of the Devon hedge to deliver a suitable site access.
- 3.22 The need to retain hedgerows on site, where possible, is adequately addressed under draft LP policy PB08, which acknowledges that there may be instances where the removal of hedgerows is justified and unavoidable. There is no justification to include Devon hedges within draft LP policy PB03.

Policy PB07 – Ecological enhancement and biodiversity in the built environment

- 3.23 Whilst Taylor Wimpey supports the overall principle of this policy, and the importance for new development to deliver ecological enhancements, it is disappointing that the policy has not been amended to reflect the comments made during the previous Regulation 19 Consultation
- 3.24 We have significant concerns, however, regarding the lack of flexibility within the policy wording, which states the following requirements:
- One integrated bird box per dwelling;
 - Provision of integrated bat boxes;
 - An integrated bat loft within all major developments;
 - Gaps in fences to facilitate the movement of hedgehogs; and
 - Provision of overhanging eaves for nesting house martins in all major developments.
- 3.25 It is reiterated that additional flexibility should be provided within the policy wording to allow ecological enhancement features to be determined on a case-by-case basis and to be influenced by site context and ecological opportunities for example one bat box or bird box per dwelling.

Policy PB09 – Monitoring requirements for new planting schemes

- 3.26 Whilst the amendments to Policy PB09, which remove the obligation for the developer to contribute a financial bond equal to 25% of the calculated planning costs prior to the commencement of construction are welcomed, Taylor Wimpey continue to object to this policy, which is not justified and therefore not sound.
- 3.27 The draft policy requires annual inspection reports to be prepared and submitted to the Local Planning Authority for a period of 5 years following completion of the planting works. It should be recognised that developers will frequently transfer the ownership of a scheme's public open space to a management company, which would then assume responsibility for the ongoing maintenance of the planting. It is not justified for the developer, who will no longer

hold any interest in the land, to be made responsible for submitting annual inspection reports to the LPA, as implied by Part B of the draft Local Plan policy.

3.28 We strongly encourage this element of the policy is omitted.

Strategic Policy OS02 – Sport, recreation and open space provision in association with development

3.29 This policy sets out the requirements for the provision of open space for new developments, with the level of required open space required varying by site size. The policy has been revised to state that developments are required to provide the following:

- Up to 20 homes – informal play provision
- Between 21 and 100 homes – LAPs and informal play provision
- Between 101 and 500 homes – LAPs, LEAPs and informal play space
- More than 500 homes - LAP, LEAP, NEAP, informal play, amenity green space, and additional green space types.

3.30 Additional requirements for developments over 200 homes include:

- Doorstep accessible Greenspace (0.5ha within 200m) or;
- Local accessible Greenspace (2ha within 300m). For sites over 300 homes, Neighbourhood Accessible Greenspace (10ha within 1km) is required.
- Open space will be calculated based on an average of 2.26 residents per household, with some exceptions or contributions to off-site spaces allowed.

3.31 We welcome the minor amendment to the policy wording, which provides different requirements for developments between 101 and 500 homes.

It is also reiterated that the requirement for additional open space typologies for developments exceeding 200 homes is unnecessary. We maintain that the policy wording should allow for greater flexibility, recognising that certain development typologies may not be deliverable on some sites due to physical constraints, including topography and the surrounding site context.

4. SITE ALLOCATIONS: LAND OFF NORTHCOTE HILL, HONITON (GH/ED/39)

Introduction

4.1 Strategic Policy SD03 sets out the development allocations within Honiton. While Taylor Wimpey continues to support the allocations of both GH/ED/39a and GH/ED/39b, it is reiterated that the quantum of development allocated for GH/ED/39b must be increased.

4.2 The draft allocations for Land off Northcote Hill are as follows:

Land south of Northcote Hill – north of the railway (GH/ED/39a)

This site is allocated for a total of 115 homes and will form a medium-scale residential extension on the eastern side of Honiton. Vehicular and pedestrian/cycle access improvements would be required. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.

4.3 This allocation is wholly supported by Taylor Wimpey. An outline planning application was resolved to be approved on the allocation site by East Devon Planning Committee in 2023 for the development of up to 115 homes, public open space, sustainable drainage systems, landscaping, vehicular access via Tunnel Lane and associated highways improvements and infrastructure. The proposed development was for up to 115 homes. A decision notice is due imminently.

Land south of Northcote Hill – south of the railway (GH/ED/39b)

This site is allocated for a total of around 195 homes and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area. 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. There should be no development on land above the 160m contour. Provision should be made for suitably landscaped areas of open space with circular walks throughout the site, giving particular attention to the relationship with the national landscape.

Vehicular and pedestrian access improvements would be required, with Northcote Hill integrated into the development layout to ensure safe and effective connectivity. The development will need to maximise opportunities for localised improvements and contributions to enhance sustainable travel modes.

4.4 Whilst Taylor Wimpey supports both allocations GH/ED/39a and GH/ED/39b, draft allocation GH/ED/39b must be increased to at least 299 homes. A comprehensive suite of technical assessments has recently been undertaken, which confirms that the site can accommodate a significantly higher quantum of development, while delivering an extensive community park and other public benefits, including a neighbourhood hub. The submitted planning application illustrates how a landscape-led development approach, incorporating residential provision

alongside extensive areas of public open space, including a new community park, can accommodate up to 299 homes on part of the site.

Draft LP Evidence Base – Sustainability Appraisal Report (2nd Reg. 19)

- 4.5 Alongside the revised draft Local Plan, the Council has also published a revised Sustainability Appraisal (SA), in which Land at Northcote Hill (GH/ED/39a and GH/ED/39b) have been assessed against the SA Objectives. The current SA has constrained the overall site's development capacity to 300 dwellings, comprising 115 dwellings for site reference GH/ED/39a and 195 dwellings for site reference GH/ED/39b.
- 4.6 Taylor Wimpey disagrees with a number of the SA scoring against the SA objectives, in particular, the assessment of objectives 2,4,5,7,9. Taylor Wimpey has provided additional evidence against each of those objectives and rescored the site accordingly, this is shown in the table below.
- 4.7 The reassessment, undertaken by Boyer below, demonstrates that the site is capable of accommodating an increased quantum of development, and therefore the draft allocation should be increased within the Draft Local Plan.

Table 4.1 SA Assessment for GH/ED/39 and Boyer’s reassessment based on site-specific technical surveys and assessments

SA Objective	SA Score		SA Commentary	Boyer response relating to Land off Northcote Hill	Boyer Score
<p>1. Biodiversity To conserve and enhance the habitat and wildlife of our natural environment.</p>	+	-	<p>GH/ED/39 The north of the railway site covered by improved grassland with small areas that have overgrown grass and grazed by sheep, and the south of the railway site, it has improved grassland and arable. Trees and vegetation on the edge of the site boundary. Development of the two small woodlands within the site would have a negative effect</p>	<p>Disagree – the tree reports submitted with the planning applications confirms there are no TPO’s, Ancient Woodlands or Veteran Trees on site, as well as the majority of trees on site being classed as low quality. Wooded areas on site would be retained as part of a future scheme.</p>	+
<p>2. Landscape To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape.</p>	-		<p>GH/ED/39 is outside but adjoins the National Landscape, which would have a visual impact on the National Landscape and likely minor negative effect.</p>	<p>Disagree – A Landscape Visual Assessment has been prepared for both planning applications north and south of the railway line and confirm the site will be sympathetically designed in a manner that will have no adverse effect on the adjacent National Landscape and that a sensitive form of development would be deemed acceptable.</p> <p>Positive discussions have also taken place with Landscape Officers at EDDC, demonstrating that the Site is able to accommodate in excess of 300 dwellings. whilst having no negative impacts on the surrounding landscape.</p>	0

<p>3. Historic and built environment.</p>	<p>0</p>	<p>GH/ED/39 is located in a remote location in Honiton, with no designated heritage asset within 100m, so no significant effect.</p>	<p>A report written by TCMS Heritage concludes that there are no heritage constraints to development of the site.</p>	<p>0</p>
<p>4. Climate change and carbon emissions To minimise greenhouse gas emissions.</p>	<p>0</p>	<p>GH/ED/39 has 9 out of 12 facilities within 1,600m of the site, and over 1km to the town centre, an hourly or better bus service is available but all the sites are located on the periphery of Honiton so development is likely to increase car travel.</p>	<p>Disagree – The site is within walking distance of Honiton Town Centre, with various leisure facilities (including restaurants and coffee shops), post office, opticians, dentist, primary school and community college all located within 20 minutes' walk from the site.</p> <p>Honiton railway station, rugby club, leisure centre, Honiton hospital and surgery are all located within 10 minutes cycle from the site.</p> <p>The proposed development is therefore founded on the 20-minute neighbourhood concept and promoted the use of sustainable modes of transport.</p>	<p>+</p>
<p>5. Climate change adaption To adapt to the possible effects of climate change.</p>	<p>0</p>	<p>GH/ED/39 has medium/high flood risk (zones 2 & 3) covering a minor part of the site and development could avoid those areas.</p>	<p>The concept masterplan demonstrates that any areas of the site at risk of flooding (from all sources) would be kept free from development. A comprehensive drainage strategy has been prepared by Phoenix Design which demonstrates that</p>	<p>+</p>

Boyer

			development would, in accordance with the NPPF, be safe for its lifetime.	
6. Land resources To utilise our land resources efficiently and minimise their loss or degradation.	-	GH/ED/39 has Grade 2 agricultural land in the eastern part of the site, and Grade 3 agricultural land in the western part, so a negative effect.	Noted national mapping indicates that the site has some areas of higher agricultural land grading.	-
7. Water Resources To utilise our water resources efficiently and minimise their loss or degradation.	-	South West Water forecast there will be adequate water supply; but the capacity of Honiton Wastewater Treatment Works is forecast to be exceeded by proposed development at the settlement, GH/ED/39, albeit environment permit compliance is sufficient (Water Cycle Study, November 2025). Therefore, a negative effect is likely for all sites included in the Water Cycle Study, with uncertainty for others.	Taylor Wimpey is committed to ensuring that there are no adverse impacts in relation to water resources in the area. The scope of which will be informed by on going discussion with the Local Authority.	0
8. Homes To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs.	++	GH/ED/39 has a maximum yield of 100 plus homes, meaning a significant positive effect. All other sites have the potential to deliver less than 100 homes, so will have a positive effect. An appropriate mix of tenures and sizes including affordable housing is assumed for all sites.	Agreed – the allocations could deliver a significant quantum of homes and make a meaningful contribution towards EDDC's housing need in the short to medium term. As shown through the site assessment work, the site could accommodate a greater quantum of development (up to 115 homes on land north of the railway line and at least 299 homes on land south of the railway line)	++

Boyer

<p>9. Health and well-being To support healthy, safe and active communities where people have access to attractive and functional recreation spaces</p>	-	<p>GH/ED/39 is within 800m of a 40% most deprived neighbourhood and open space/allotment and a play area, but adjacent to the railway line meaning a negative effect.</p>	<p>Disagree – The scheme will be developed in a manner that provides sufficient buffer from the adjacent railway line therefore delivering no negative effects. The proposed development would provide considerable areas of public open space for the enjoyment of existing and future residents of Honiton, the new public open space could include a community park, walking routes (with trim trail equipment), orchard and an allotment and is therefore centred on promoting healthy living and well-being. A scheme of up to 299 dwellings on land south of the railway line could also deliver a neighbourhood hub, which would improve the facilities and services on offer within this part of Honiton.</p>	0
<p>10. Access to services To provide accessible and attractive services and community facilities for all ages and interests.</p>	+	<p>GH/ED/39 is within 1600m from a primary school, secondary school, pub, shop, GP surgery, community hall, post office and library, a minor positive effect.</p>	<p>Agreed – the site is within walking distance of Honiton’s services and facilities. As indicated on the concept masterplan, the proposed development could deliver a Neighbourhood Hub that would serve existing and future residents, delivering an overall positive effect.</p>	+
<p>11. Jobs and employment To foster a strong and entrepreneurial economy and increased</p>	+	<p>GH/ED/39 is within 1600m to jobs in the town centre and have the realistic potential to deliver on-site employment</p>	<p>Agreed – the site’s proximity to Honiton town centre as well as public transport routes to further employment areas</p>	+

<p>access to high quality skills training to support improved job opportunities and greater productivity.</p>		<p>due to the scale of development, so minor positive effects.</p>	<p>delivers positive effects to the development.</p>	
<p>12. Town centres To safeguard and strengthen the vitality and viability of town centres.</p>	+	<p>The rest of the sites are located in the town centre area or within 800m of an existing town centre, major positive effect.</p>	<p>Agreed – the site’s proximity to the town centre of Honiton, delivers a majorly positive effect.</p>	+
<p>13. Connectivity and transport To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon</p>	+	<p>Whilst GH/ED/39 is within 800m of a bus stop, the service is less than daily and only serves rural locations. Several sites are accessed off narrow lanes where highways and footpath improvements will be required to deliver development, including GH/ED/39</p>	<p>Agreed - the site is within walking/cycling distance of a number of local facilities and amenities within Honiton as well as public transport opportunities such as Honiton Railway Station as well as bus services. A recent planning application also proposed improvements to be made to the adjoining highway and footpath, resulting in a scheme of up to 299 dwellings that is considered acceptable in terms of Highways and Access.</p>	+

4.8 The revised suitability assessment for GH/ED/39 is therefore as follows:

	1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.	12.	13.	
East Devon SA assessment	+	-	-	0	0	0	-	-	++	-	+	+	+	+
Boyer revised assessment	+	0	0	+	+	-	0	++	0	+	+	+		

4.9 The above revised site suitability assessment for land off Northcote Hill, Honiton (land north and south of the railway line), which has been assessed using the site’s specific technical surveys and assessments prepared by relevant technical consultants, demonstrates that the site can deliver at least 299 homes on land south of the railway line, and up to 115 homes on land north of the railway line, and continue to positively contribute towards EDDC’s Sustainability Objectives.

Technical Reports

- 4.10 GH/ED/39a and GH/ED/39b are supported by a full suite of Technical Reports and concept masterplans which have been submitted as part of the planning applications on the site. These demonstrate the site can accommodate an increase in development and therefore the site's capacity should be increased.
- 4.11 The technical reports demonstrate that GH/ED/39b can accommodate a greater quantum of development than set out within the Draft LP. The technical reports are summarised below.

Landscape Considerations

- 4.12 A Landscape and Visual Impact Assessment has been undertaken, with viewpoints agreed with East Devon District Council Officers. The assessment confirms that GH/ED/39b can accommodate at least 299 homes in a manner that responds positively to its landscape context, including the nearby National Landscapes. The built form is contained within the 160m contour, and substantial structural planting is proposed along the eastern edge to integrate the development with the existing landform. The effects on landscape character are considered limited and localised, particularly if the adjacent Northcote Road development is completed.

Heritage and Archaeology

- 4.13 An Historic Environment Desk Based Assessment confirms that GH/ED/39b does not include any designated heritage assets. The site forms a minor part of the views from the Dumpton Hill Fort Scheduled Monument, but the impact on the significance of designated heritage assets is negligible. Considering the above, there are no heritage or archaeology factors that would prevent the delivery of at least 299 homes on this site. The draft allocation should be amended to align with this.

Ecology

- 4.14 An Ecological Impact Assessment confirms that GH/ED/39b has no designated sites within or adjacent to its boundaries. Habitats of highest ecological value, such as broadleaved woodland, will be retained and buffered within the scheme. The assessment confirms that the site can accommodate a higher quantum of development whilst meeting national requirements and remaining technically suitable.

Arboriculture

- 4.15 An arboricultural survey confirms there are no Tree Preservation Orders, Ancient Woodlands, or Veteran Trees on the site. All trees are to be retained where possible, with any removals limited to low-quality specimens. Encroachments into root protection zones will be minor and managed by appropriate tree protection measures. The landscape strategy proposes additional tree planting along key boundaries, supplementing existing vegetation and contributing to overall biodiversity net gain. The development is not considered to result in a likely significant effect in respect of arboriculture.

Flood Risk and Sustainable Drainage

- 4.16 The majority of the site lies within Flood Zone 1, with the concept masterplan being informed by this. All development including dwellings, access and egress can be delivered within Flood Zone 1 in accordance with the NPPF. The proposed development is supported by a drainage strategy, which includes sustainable urban drainage systems (SuDS) and ensures that occupiers and users will remain safe from current and future surface water flood risk for the lifetime of the development, without increasing flood risk elsewhere. The sequential test is not required in this context. The drainage network is designed not to exacerbate existing flood risk upstream or downstream, in accordance with the NPPF and Environment Agency criteria.

Ground Conditions

- 4.17 A Phase 1 Ground Investigation Report confirms the site is underlain by Head Deposits and Branscombe Mudstone Formation. The site is considered to be between very low and low risk in respect to contamination and ground gas, with no significant concerns for development. As a result of the above, the sites capacity should be increased to allow for further development.

Noise

- 4.18 An Acoustic Design Statement demonstrates that, through good acoustic design, suitable internal and external amenity standards can be achieved. The site is suitable for residential development in terms of noise levels, and the draft policy should be amended to align with this.

Highways

- 4.19 The site and proposed development is supported by a Transport Assessment and Residential Travel Plan, prepared in consultation with Devon County Council, which confirms that each development parcel can benefit from primary access routes from Northcote Hill. The access points and road hierarchy have been accepted by the Highway Authority. The scheme prioritises high-quality walking, cycling, and public transport infrastructure, in addition to traffic capacity. A pedestrian footway will be constructed along Northcote Hill's northern flank, connecting to the town centre, and a footway is also proposed along the southern boundary. GH/ED/39b is well located for access to existing bus services and Honiton Railway Station. Trip generation and junction capacity analysis demonstrate that traffic impacts will be insignificant. The Travel Plan, to be secured through a S106 Agreement, sets out measures to reduce car use and promote sustainable transport, with effectiveness monitored over five years. Energy and Sustainability
- 4.20 The site is supported by an Energy and Sustainability Statement, which demonstrates that the proposed development responds positively to local and national sustainability requirements. Measures include an overheating assessment, water efficiency standards, climate change allowances in flood risk and drainage, and biodiversity enhancement. The dwellings will adopt a fabric-first approach, reduce embodied carbon, be 'net zero' ready, and focus on renewable energy opportunities.

Air Quality

- 4.21 The site has been subject to an Air Quality Assessment, which confirms that, with mitigation, dust emissions during construction will be not significant, and operational impacts on NO₂, PM₁₀, and PM_{2.5} will be negligible. The site is suitable for residential development in air quality terms, and recommended mitigation measures will be implemented during construction.

Health Impact Assessment

- 4.22 The site and proposed development, is supported by a Health Impact Assessment, which confirms that the development will deliver health benefits by providing necessary housing, employment opportunities, and services, while reducing environmental risks and supporting improved health and wellbeing.

5. STRATEGIC POLICY SD03: LAND SOUTH OF NORTHCOTE HILL – SOUTH OF THE RAILWAY LINE

- 5.1 These representations and accompanying Technical Notes demonstrate that the current draft allocation at Land South of Northcote Hill – south of the railway line (GH/ED/39a), which restricts the capacity of the site to 195 homes, does **not** constitute effective use of land or optimises the use of land to accommodate an appropriate amount and mix of development (in accordance with NPPF 2023; Paragraph 135e).
- 5.2 The Draft LP policy for land south of the railway line (GH/ED/39b) must be increased to at least 299 homes for the following reasons:
- It would make efficient use of the site in accordance with national policy;
 - It would enable the site to support additional uses in the form of a community park and additional facilities such as a neighbourhood hub, as well as making a more meaningful contribution towards EDDC's housing land supply and meeting the housing needs of East Devon in a sustainable location;
 - The site is being promoted by a national housebuilder that is committed to delivering homes in the short-medium term – a planning application has already been submitted to East Devon District Council for a development of up to 299 homes. Increasing the quantum of development on this allocation would ensure the draft LP delivers sufficient homes throughout the first part of the Plan period to meet its needs, noting the concerns raised regarding the delivery assumptions of the new settlement east of Exeter.
- 5.3 To ensure the draft LP makes the most efficient use of land, it is reiterated that the draft allocation should be revised as follows:





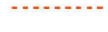















Land south of Northcote Hill – south of the railway line (GH/ED/39b)

*This site is allocated for at least 299 **homes** and will form a medium-scale residential extension on the eastern side of Honiton. Parts of the site are on more elevated ground and development will need to be sensitively planned to avoid adverse impacts on the nearby Blackdown Hills National Landscape area. Vehicular and pedestrian access improvements would be required, incorporating Northcote Hill into development. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.*

APPENDIX 1. 333102063 BL-M-03L ILLUSTRATIVE MASTERPLAN

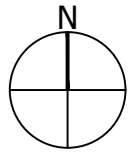


LEGEND

-  Site Boundary
-  Open Space
-  Residential Parcels
-  Primary Street
-  Public Right of Way
-  Primary Frontage
-  Secondary Frontage
-  Street Trees
-  Indicative Planting (including proposed and existing planting to be retained)
-  Potential areas for play
-  SuDS ponds
-  Indicative paths through open space
-  Existing ponds to be retained
-  Proposed Vehicular Access
-  Proposed Pedestrian, Cycle and Emergency Access
-  National grid transmission lines - overhead cable
-  National grid transmission lines - pylon
-  Railway line
-  Proposed Neighbourhood Mobility Hub
-  Existing building to be retained

Project
Land at Northcote Hill

Drawing Title
Illustrative Masterplan



Date 13.11.25	Scale 1:2,500@A2	Drawn by LP	Check by AT
Project No 333102063	Drawing No BL-M-03	Revision L	



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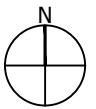
**APPENDIX 2. 20424 BL-M-06H ILLUSTRATIVE
MASTERPLAN 2500-A3**



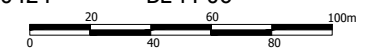
LEGEND

-  Site Boundary
-  Main Access
-  Pedestrian/Cycle only access
-  New Homes
-  Streets
-  Foot & Cycle Path
-  Tunnel Lane Pedestrian & Cycle route
-  Public Open Space
-  Play Areas
-  Trees and Hedges
-  Attenuation Ponds
-  Potential Noise Bund
-  Proposed Pumping Station
-  Proposed Sub-Station

Project
**Land off Northcote Road,
 Honiton**
 Drawing Title
Illustrative Masterplan



Date 16.12.22	Scale 1:2500@A3	Drawn by RHM	Check by AT
Project No 20424	Drawing No BL-M-06		Revision H



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