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**ELL Holdco Limited**

Regulation 19 Consultation

Hornbeam Country Park, Dunkeswell, Honiton, EX14  
4XW

January 2026

# Representations to the East Devon Local Plan 2020 to 2042 Second Regulation 19 Publication Draft Regulation 18 Consultation

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# 1. Introduction to Representations

- 1.1. These representations have been prepared on behalf of ELL Holdco Limited, the owners of Hornbeam Country Park, Dunkeswell, Honiton, EX14 4XW in response to East Devon District Council's (EDDC) emerging East Devon Local Plan 2020 to 2042 Second Regulation 19 Publication Draft November 2025 which runs until 26 January 2026.
- 1.2. Hornbeam Country Park is a holiday caravan park which is identified in the emerging East Devon Local Plan 2020 to 2042 as being within Dunkeswell settlement boundary.
- 1.3. This submission responds to the second Regulation 19 Second Regulation 19 Publication Draft and where relevant, the supporting evidence base, also taking into considering national guidance within the National Planning Policy Framework - December 2024 (hereafter referred to as the NPPF) and National Planning Practice Guidance (hereafter referred to as NPPG).
- 1.4. These representations have been prepared having primary regard to the extant version of the NPPF, which currently provides the operative national policy basis for plan preparation and decision-taking. However, due regard should be given to the emerging National Planning Policy Framework 2025, which is presently subject to public consultation until March 2026. Although the emerging Framework does not yet attract full statutory weight, it signals a clear direction of travel in national planning policy, including the introduction of new national decision-making policies and a strengthened emphasis on plan responsiveness, delivery, and sustainable growth.
- 1.5. In this context, the policies of the emerging Local Plan should be framed with sufficient flexibility and consistency to ensure alignment with forthcoming national policy requirements, to avoid early obsolescence, and to ensure that the emerging East Devon Local Plan 2020 to 2042 can be found sound, effective and capable of being implemented throughout the plan period. Appropriate weight should therefore be afforded to emerging national policy principles when assessing the justification, effectiveness and consistency of the Local Plan's strategy and development management policies.



## 2. Policy SE10 Sustainable Tourism

### Introduction

- 2.1. These representations, specifically refer to Policy SE10: Sustainable Tourism, the supporting text at paragraph 9.59 and the evidence base referred to in footnote 85 to paragraph 9.59. The evidence base in footnote 85 comprises ECN-014 Marketing Statement Guidance and ECN-017 Viability Statement Guidance.
- 2.2. Policy SE10 Sustainable Tourism sets out EDDC's approach to visitor accommodation, facilities and attractions and states that such development within settlement boundaries will be supported and encouraged where they are of an appropriate scale for the locality and minimise reliance on the private car.
- 2.3. Policy SE10 is then split into three parts comprising 1) Tourism development in the countryside 2) Loss of Existing Visitor Accommodation and 3) Proposals for new Tourist Attractions/Facilities or Accommodation
- 2.4. Our representations specifically relate to the second part 'Loss of Existing Visitor Accommodation' which states:  
*'The loss of any visitor accommodation to other uses will only be permitted in exceptional circumstances. For example, converting holiday accommodation into low cost staff accommodation (rented residential accommodation for local workforce), which will address recruitment challenges for the tourism sector.'*
- 2.5. The supporting text at paragraph 9.59 states:  
**'The Council will resist the loss of permanent visitor accommodation unless it is financially unviable, requiring evidence through marketing requirements. 85.'**
- 2.6. The evidence base in footnote 85 comprises ECN-014 Marketing Statement Guidance and ECN-017 Viability Statement Guidance. This evidence only relates to employment uses and doesn't include any reference to the economic viability considerations that apply to the loss of visitor accommodation.

### Response

- 2.7. The operators of Hornbeam Country Park, have significant experience and knowledge operating holiday parks across the UK, including Devon. They support the overall objective Policy SE10 is seeking to retain holiday parks that are economically viable and provide visitors with good quality accommodation, thereby contributing to the visitor economy. However, there are holiday parks that are not viable or attractive, taking into consideration numerous factors, including their location, range of facilities, and quality of accommodation. It is important in policy terms to provide more flexibility to enable those holiday parks to be updated and modernised and where feasible enable other suitable uses in appropriate locations.
- 2.8. In relation to the promotion of sustainable development, the NPPF is clear that the planning system should pursue sustainable development by balancing environmental, social and economic objectives (paragraph 8). As currently drafted, the policy,



supporting text and evidence base places a strong emphasis on protection, with limited explicit recognition of achieving balanced outcomes, such as the economic and social and environmental benefits arising from well-designed development.

- 2.9. In terms of building a strong, competitive economy, the NPPF paragraph 85 clarifies from the outset that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 2.10. As currently worded Policy SE10 is overly restrictive in its wording that the loss of visitor accommodation is only allowed in exceptional circumstances. In our view this does not align with the promotion of sustainable development creating balanced outcomes as defined in paragraph 8 of the NPPF. Furthermore, it provides no opportunity for visitor accommodation businesses to adapt in accordance with NPPF, paragraph 85.
- 2.11. On this basis we do not consider the Local Plan accords with the tests of soundness, in particular being justified and consistent with national policy.
- 2.12. Policy SE10 provides just one example of alternative uses which it considers provide exceptional circumstances to support the loss of visitor accommodation, namely for low cost staff accommodation. There is no evidence justification which supports this type of housing need as an alternative use to visitor accommodation and again the policy wording is overly restrictive. This does not reflect the possibility that there are holiday accommodation sites, within settlement boundaries, that no longer function well as holiday parks, for example because of their location in relation to permanent residential development, their lack of facilities and other location-related issues. The policy needs to take a more balanced view, allowing site-specific considerations to be considered when making a judgement about loss of accommodation.
- 2.13. Again, we do not consider the Local Plan accords with the tests of soundness, in particular being justified and consistent with national policy.

### **Recommended Changes**

- 2.14. Accordingly, Policy SE10 should be amended in line with the approach set out in paragraph 9.59 that it will be necessary to demonstrate that there is no longer a need for holiday accommodation in a specific location. Reference to low-cost staff accommodation should also be removed
- 2.15. Furthermore, the evidence base linked in footnote 58 to paragraph 9.59 comprises ECN-014 Marketing Statement Guidance and ECN-017 Viability Statement Guidance. This evidence only relates to employment uses and doesn't include any reference to the economic viability considerations that apply to the loss of visitor accommodation. As currently drafted this evidence is not applicable. Accordingly updated evidence which clearly sets out the requirements for marketing statements and viability statements relating to the loss of visitor accommodation should be provided and accurately



referenced in Policy E10. This should include locational criteria, assessment of how well the site currently performs a holiday function, whether the site is appropriate in residential amenity terms (where a site immediately abuts permanent residential dwellings), whether the site falls within a settlement boundary where permanent residential development is acceptable in principle and the extent to which the site could assist in providing permanent residential accommodation



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