

East Devon District Council  
Planning Policy Team  
Blackdown House  
Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ

**Date:** 28 March 2025

**Our ref:** 31650/01/PR/ZM/33603617v3

Dear Sir/Madam

## **East Devon Local Plan – Preferred Options (Regulation 19) Consultation**

On behalf of our client, the Church Commissioners for England (the Commissioners), we enclose representation to the East Devon Local Plan (Regulation 19) Consultation.

The Commissioners is a registered charity that supports the work and mission of the Church of England across the country. Its investment policy is to hold a diverse portfolio of investments across a broad range of asset classes consistent with its ethical guidelines. Its Strategic Land team brings forward land for new housing development with the aim of delivering new homes and employment opportunities which support and enhance the local community. Many new developments also include new schools, community facilities, and new areas of open space, which benefit not only new residents but also neighbouring communities.

The Commissioners own land in Clyst Honiton, East Devon, known as the Clyst Honiton Bypass Site ('the Site'). The Site has previously been submitted to the East Devon District Council (EDDC) Call for Sites consultation and Preferred Options Regulation 18 Consultation, as well as the to the Clyst Honiton Neighbourhood Plan and Greater Exeter Strategic Plan Call for Sites in April 2017. The Site is proposed to be brought forward for development under a Neighbourhood Development order, and was considered as an allocation in the Regulation 14 Clyst Honiton Neighbourhood Plan consultation. This was subsequently disregarded as it was understood that the Neighbourhood Development Order would not be brought forward on the same timeline as the now made Clyst Honiton Neighbourhood Plan. A plan showing the location of the site is included at Annex 1. The Commissioners continue to engage with the Clyst Honiton Steering Group in relation to the emerging Neighbourhood Development Order.

## **Response to the Regulation 19 Consultation**

In the context of the above, the remainder of this letter sets out The Commissioners' response to the EDDC Local Plan 19) Consultation. The Commissioners generally support the vision and objectives set out in the consultation document. We comment in relation to specific policies below.

## **Strategic Policy SP01: Spatial Strategy**

The Commissioners supports Strategic Policy SP01 and the focus for new development on the West End of the district, including a new town and other strategic developments east of Exeter. In particular, we note that Clyst Honiton is identified as ‘open countryside.’ We would emphasise that Clyst Honiton is a sustainable and suitable location for development given the good connectivity to the existing road network, Exeter Airport and Exeter.

## **Strategic Policy SP02: Levels of future housing development**

The Commissioners consider that the housing provision identified within the Policy SP02 is in contrast with the requirements of the December 2024 National Planning Policy Framework and its updated Standard Method.

The December 2024 NPPF sets out that plans that are at Regulation 19 consultation stage by 12 March 2025 will be examined under the December 2023 version of the Framework. Paragraph 236 of the NPPF states where exempt plans demonstrate a housing requirement meets less than 80% of local housing need under the new standard method, work on a new plan must commence immediately following adoption of the plan currently under preparation in order to address housing needs.

The Regulation 19 Consultation document identifies at paragraph 3.11 establishes that the new standard method generates an average housing need of 1,188 dwellings as of February 2025. East Devon District Council (EDDC) in its justification for Policy SP02 identifies the authority’s housing need to be 80% of the figure produced by the new standard method, a requirement of 950.4 dwellings per annum. Policy SP02 proposes to address a housing need of 20,909 dwellings, which is equivalent to provision of 950.4 dwellings per annum. The document also identifies a ‘surplus’ (para. 3.11-3.12) of 1,707 dwellings when accounting for projected delivery including built dwellings, permitted, projected future windfalls and allocations (as of April 2024).

Through its approach, EDDC inaccurately identifies its need to be 80% of its actual need, and states any provision over 80% of need to be ‘surplus’. This demonstrates EDDC’s unwillingness to engage with the real housing need presented in the district by the new NPPF, does not represent positive preparation, and is not a justified approach to housing need. Policy SP02 takes a bare minimum approach to the requirements of the NPPF, seeking to achieve only 80% of housing requirement, utilising a further 1,705 dwellings only in the event of non-delivery of dwellings as opposed to accommodating the availability of land within the housing targets. Policy SP02, in this case, is unsound

The Commissioners recommend EDDC review this policy to identify and provide for 100% of the housing need required by the December 2024 NPPF and its transitional arrangements in Annex 1.

The Commissioners acknowledge that the Office for National Statistics has published its affordability ratio for 2024 on 24 March 2025. This impacts the calculated housing requirement under the new standard method, reducing need. Whilst the need is reduced from the figure of 1,188 to 1,146, the need is still calculated to be greater than EDDC’s proposed annual need of 950.4 dwellings and therefore the principles outlined above still apply.

### **Strategic Policy SP03: Housing requirement by Designated Neighbourhood Area**

The Commissioners support Strategic Policy SP03, which outlines the minimum development to take place in each Designated Neighbourhood Area during the plan period. We note the inclusion of a “*minimum*” figure, which provides a degree of flexibility that allows for additional development within the plan period. With respect to the Requirement Figures that support the policy in Appendix 2 of the Draft Plan, it is noted that the Commissioners’ promoted Site, which is being pursued for development by the Clyst Honiton Parish Council through a Neighbourhood Development Order, is not accounted for within the figures.

The Site has been excluded from the made Clyst Honiton Neighbourhood Plan (13 March 2025) due to a NDO not being able to be completed prior to the making of the plan. Whilst this is the case, the Site is likely to come forward within the plan period, and could be accounted for within Policy SP03 as a ‘commitment.’ This can assist to support in providing the shortfall in housing provision as outlined above. The Site has been assessed to have a maximum capacity of 50 dwellings, employment space and a new community facility as promoted within the Regulation 14 and 16 Neighbourhood Plan consultations. As such, the Site could support the development of 50 dwellings.

### **Strategic Policy SP04: Employment provision and distribution strategy**

The Commissioners endorse EDDC’s objective of supporting business investment and job creation opportunities within East Devon. The Commissioners have a record of delivering facilities in East Devon, including the Exeter Gateway Distribution facility to the north of the Site, at which Lidl and Amazon distribution centres are already operating.

It is noted that Strategic Policy SP04 does not quantify a proportion of employment land contribution for windfall developments. The flexibility of this approach is supported by the Commissioners, as it allows site specific circumstances, such as location and viability, to be taken into account when determining appropriate land uses.

### **Strategic Policy SP06: Development beyond Settlement Boundaries**

The Commissioners welcome the flexibility of Strategic Policy SP07 to permit development outside of settlement boundaries where it is in accordance with specific Local or Neighbourhood Plan policies which explicitly permits such development, where it would not harm the distinctive landscape, amenity and environmental qualities of the area within which it is located. This approach will assist in bringing forward appropriate development on sites within rural Neighbourhood Plan areas that otherwise would be opposed within the Local Plan.

### **Strategic Policy WSO1: Development of a second new community east of Exeter**

The Commissioners recognise that long-term strategic developments can be crucial to meeting housing requirements in the district, along with providing key infrastructure and facilities for new and existing residents. In this context, The Commissioners endorse Strategic Policy WSO1 and the development of a second new town east of Exeter. The Commissioners particularly endorse the Option for allocation

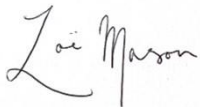
brought forward to the Regulation 19 Draft Plan, which benefits from good access via the A30, proximity to Exeter Airport and Exeter Gateway Distribution facility to promote commercial uses, and can be made acceptable in terms of landscape, heritage and ecology via appropriate masterplanning. The site would provide the opportunity to deliver infrastructure to support other development within the local area, particularly complementing the existing Clyst Valley Regional Park and providing opportunity for expansion.

## **Summary**

The Commissioners welcome the opportunity to comment on the emerging Local Plan. In short, the Commissioners support the focus for new development in the western part of the District and the introduction of the New Town under Strategic Policy WSO1. Whilst this is supported, the Commissioners acknowledge that EDDC are not seeking to address the full housing need of the district as established by the new standard method of the December 2024 NPPF.

We trust that these representations are clear and will assist in the finalisation of the emerging Local Plan. Please do not hesitate to contact me or my colleague Pauline Roberts should you require any clarification on any points made. We would also be grateful if you would continue to keep us informed on progress of the development of the emerging Local Plan and any other planning documents that are prepared by the local planning authority.

Yours faithfully



**Zoë Mason**  
Planner  
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**Annex 1:**



Figure 1 - Clyst Honiton Site Location Plan