

Our Ref: 1188

28 March 2025

East Devon District Council

By Email Only



Dear Sir / Madam,

East Devon Local Plan Regulation 19 Consultation – Representation

We write on behalf of the Hobart Land Ltd in relation to the East Devon Local Plan Regulation 19 consultation and their land interest related to the former showground site at Honiton.

We are instructed by Hobart Land Ltd to promote the land for a mixed-use residential and sports development. A concept masterplan has been prepared for the former showground site, which indicates how approximately 150 dwellings and sports pitch provision focussed on creating a junior rugby hub (including 3 x U11/12 pitches, a U7/8 pitch/training pitch and a pavilion), could be delivered at the site. The plan also shows how the site can be accessed and provide wider forms of open space, including children play areas, and landscaping. Please find a copy of the plan attached to this letter.

This representation provides comments on the local plan spatial strategy and key policies relating to housing delivery and Honiton (specifically policies SP01, SP02 and SD03), and questions whether the current draft of the local plan is justified taking account of the reasonable alternatives that are available. This representation follows on from previous submissions made to the Council.

Strategic Policy SP01: Spatial Strategy sets out that *“New development will be directed towards the most sustainable locations in East Devon, by: ... C. Promoting significant development at the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas;*

This overarching strategy for the Main Centres is welcomed. The levels of future housing development are outlined in Strategic Policy SP02. This states that *“Housing provision will be made for at least 20,909 dwellings (net) to be delivered in the plan area between 1 April 2020 to 31 March 2042. The housing requirement will be delivered through a stepped trajectory, with an annual target of 850 homes from 2020/21 to 2031/32, increasing to 1,070 homes per year from 2032/33 to 2041/42.”*

The level of housing identified is supported in the main, however, it only represents 80% of the housing requirement calculated using the new standard methodology introduced in December 2024 by the

CHARTERED SURVEYORS | PROPERTY AGENTS | AUCTIONEERS

Barnstaple | Bideford | Bridport | Dartmouth | Dulverton | Exeter | Honiton | Kingsbridge | Launceston | Okehampton
Plymouth | South Molton | Taunton | Tavistock | Tiverton | Torquay | Totnes | Truro | Wadebridge | Wellington | Yeovil | London

FOR A LIST OF PARTNERS, ASSOCIATE PARTNERS AND ASSOCIATES VISIT [STAGS.CO.UK](https://www.stags.co.uk)

28 March 2025

updated National Planning Policy Framework (NPPF). Although this approach is acceptable under the transitional arrangements set out in the NPPF (Annex 1 - Paragraph 234) it is questionable given the recognised housing crisis whether East Devon District Council should be looking to exceed this and plan for the full housing requirement, which would equate to 26,136 dwellings over the plan period, or at least a partially increased figure.

Additionally, given that this is a minimum housing requirement, it is crucial that there are sufficient allocations made to achieve and exceed the target. Whilst there is expected to be some flexibility in the projected supply over the plan period (1705 units / 8.2% over the minimum target), as set out in the Council's Housing delivery technical note (February 2025), there is scope for this to be improved. Increasing the amount of land available for development will provide more choice and competition in the supply, which should have benefits for delivery. It would also provide greater flexibility and resilience to the supply. The amount of allocations put forward as whole could therefore be expanded to help ensure that levels of housing above the minimum target can be achieved. Given the pressing need to boost the supply of housing land, additional allocations (including land associated with the former showground site at Honiton) could be included to achieve this.

Strategic policy SD03 details the allocation made for Honiton and these allocations provide for a total of 839 dwellings at the town (including completions). There is no reference to sports pitches being provided as part of any of the allocations.

The current Playing Pitch Strategy for Honiton (February 2017) set out plan to deliver additional playing pitches for the town. This included the provision of five rugby pitches at the former showground site plus football or cricket pitch provision at St Rita's. It is acknowledged that the Playing Pitch Strategy for the District is being reviewed at present and that is to be issued Spring/ Summer this year, however, it is notable that none of the additional pitch provision identified in the 2017 pitch strategy for Honiton has been delivered.

In this context, and given the earlier comments about bolstering the allocated land for housing delivery, we consider that the land at the former showground site provides a good opportunity to deliver a mixed use residential and sports development on the edge of Honiton. This would assist in addressing both the need for more sports pitches and housing. If the former showground site was included in this then the total supply could be increased to approximately 988, as well as securing the delivery of 4 junior rugby sports pitches. This would be a positive addition to the development strategy for the town.

The site is located in an accessible location approximately 900 metres from the town centre. This is a reasonable walking and cycling distance. Also, the site has an existing access on Langford Road which can be improved as necessary alongside other highway improvements, such as pedestrian crossing, extended footway and cycle route facilities, to provide improved connections.

The former showground site is available, suitable and achievable (as the findings of the HELAA [November 2022] found with regard to the part submitted for assessment - Honi_9) and could be developed with limited adverse impacts, it appears that there is reasonable alternative to the current



3

28 March 2025

strategy that would help further to ensure that the necessary minimum levels of housing are achieved and exceeded, and that some playing pitch provision for the town of Honiton is delivered.

In summary, we support the emerging Spatial Strategy in terms of the direction of growth to the Main Centres, however, we suggest that the Council could pursue a better alternative strategy with regard to the housing target and meeting the full housing need based on the revised NPPF, and bolstering the identified supply of land for housing to ensure that the minimum target is achieved and exceeded.

Should you have any questions or queries on this submission please contact me.

Yours faithfully,

Richard Bailey

Richard Bailey BA (Hons) DipTP MRTPI
Associate - Planning Consultant
e. r.bailey@stags.co.uk
t. 01392 439046