

Filtered Data Export

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise that the approach that has been taken to define green wedges is flawed and not based on solid evidence.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:

ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 12. OUR OUTSTANDING LANDSCAPE

Policy OL05: Green Wedges

The Local Plan Policies Map identifies a number of Green Wedges in the district. Policy OL05: Green Wedges provides the policy for these designated areas. Paragraph 12.16 of the supporting text to the policy explains that Green Wedges are a long-standing local landscape designation, in place to maintain open green networks between settlements to prevent coalescence and preserve local identity. New buildings are not prohibited in such areas, but are restricted to ensure the openness, role, and function of these landscapes are not adversely affected. Land to the south of Coly_02, is shown on the Local Plan Policies Map as lying within the Green Wedge. Our client's land interests are obviously adjacent to but entirely outside of this allocation. As such, they are supportive of the Green Wedge as drawn in this location noting that, as drawn it will appropriately achieve its objectives, whilst enabling Coly_02 to achieve comprehensive development for the village.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

2. Do you consider that this part of the Our Outstanding Landscape chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Landscape chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Landscape chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Landscape chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

4. Do you consider that this part of the Our Outstanding Landscape chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Our Outstanding Landscape chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise concerns relating to the high level of BNG being proposed as a requirement for development proposals.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr B Penny

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:

MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

1 INTRODUCTION Bell Cornwell LLP acts as planning consultant for Mr. Bruce Penny, the long standing owner of land to the south of Courtlands Lane. Land registry details (DN548773) show that Mr. Penny is the freehold owner of the site. His land currently benefits from a draft allocation for 12 dwellings under reference Exmo_23. The land is currently in agricultural use. Our client, therefore, has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Regulation 19. Consultation.

CHAPTER 13. OUR OUTSTANDING BIODIVERSITY AND GEODIVERSITY Policy PB05: Biodiversity Net Gain Strategic Policy PB05 requires that 20% biodiversity net gain (BNG) should be provided as part of all forms of major development. Where this level of provision is unviable, clear evidence to this effect needs to be provided, and the statutory 10% requirement needs to be met. Any off-site provision should be provided in the immediate locality of the proposed development. The policy also stipulates that any development which is currently exempt from BNG will still be required to provide an ecological enhancement, commensurate to the scale of development involved. Government guidance is clear that LPA's should only seek more than the statutory requirement of 10% where there is robust evidence and justification to do so, and this does not appear to have been presented within the evidence base. Experience of the current, nationally mandated requirement to provide 10% BNG already demonstrates how difficult the process of delivering BNG is, with very high levels of bureaucracy and delay associated with the process. Furthermore, where the delivery of BNG cannot be delivered on site the off-site costs of doing this are significant and can have a significant impact on viability. Doubling this requirement to 20% is only likely to add to the complexity and degree of difficulty with achieving the required level of BNG and to act as a particular disincentive to the delivery of much needed housing. This policy has not been positively prepared, is not justified and given the uncertainties surrounding the

BNG process and is not effective seeking as it does to double the current national requirement. MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 BNG is already required to be delivered as a result of national legislation. Given that this requirement will remain and within the context of the concerns outlined above, we would suggest that this policy is unnecessary, unsound and should therefore amended to achieve 10% net gain as per national requirements on development.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 13. OUR OUTSTANDING BIODIVERSITY AND GEODIVERSITY Policy PB05: Biodiversity Net Gain Strategic Policy PB05 requires that 20% biodiversity net gain (BNG) should be provided as part of all forms of major development. Where this level of provision is unviable, clear evidence to this effect needs to be provided, and the statutory 10% requirement needs to be met. Any off-site provision should be provided in the immediate locality of the proposed development. The policy also stipulates that any development which is currently exempt from BNG will still be required to provide an ecological enhancement, commensurate to the scale of development involved. Government guidance is clear that LPA's should only seek more than the statutory requirement of 10% where there is robust evidence and justification to do so, and this does not appear to have been presented within the LPA's evidence base. Furthermore, the requirement to provide 20% BNG is extremely onerous and the Acorn Property Group OBJECTS to the policy as currently worded. Experience of the current, nationally mandated requirement to provide 10% BNG already

demonstrates how difficult the process of delivering BNG is, ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 with very high levels of bureaucracy and delay associated with the process. Furthermore, where the delivery of BNG cannot be delivered on site (and it does not appear that EDDC have tested whether all BNG requirements can be delivered on their allocated sites) the off-site costs of doing this are significant and can have a significant impact on viability. Doubling this requirement to 20% is only likely to add to the complexity and degree of difficulty with achieving the required level of BNG and to act as a particular disincentive to the delivery of much needed development. Acorn Property Group is of the view that this policy has not been positively prepared. BNG is already required to be delivered as a result of national legislation. Given that this requirement will remain and within the context of the concerns outlined above, we would suggest that this policy is unnecessary, unsound and should therefore amended to achieve 10% national requirements on major development.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

1 INTRODUCTION Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border. Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03). Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 13. OUR OUTSTANDING BIODIVERSITY AND GEODIVERSITY Policy PB05: Biodiversity Net Gain Strategic Policy PB05 requires that 20% biodiversity net gain (BNG) should be provided as part of all forms of major development. Where this level of provision is unviable, clear evidence to this effect needs to be provided, and the statutory 10% requirement needs to be met. Any off-site provision should be provided in the immediate locality of the proposed development. The policy also stipulates that any development which is currently exempt from BNG will still be required to provide an ecological enhancement, commensurate to the scale of development involved. Government guidance is clear that LPA's should only seek more than the statutory requirement of 10% where there is robust evidence and justification to do so, and this does not appear to have been presented within the LPA's evidence base. Experience of the current, nationally mandated requirement to provide 10% BNG already demonstrates how difficult the process of delivering BNG is, with very high levels of bureaucracy and delay associated with the process. Furthermore, where the delivery of BNG cannot be delivered on site (and it does not appear that EDDC have tested whether all BNG requirements can be delivered on their allocated sites) the off-site costs of doing this are significant and can have a significant impact on viability. Doubling this

requirement to 20% is only likely to add to the complexity and degree of difficulty with achieving the required level of BNG and to act as a particular disincentive to the delivery of much needed housing. MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 BNG is already required to be delivered as a result of national legislation. Given that this requirement will remain and within the context of the concerns outlined above, we would suggest that this policy is unnecessary, unsound and should therefore amended to achieve 10% national requirements on major development.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: On behalf of Combe Estates Policy PB05: Biodiversity Net Gain Strategic Policy PB05 requires that 20% biodiversity net gain (BNG) should be provided as part of all forms of major development. Where this level of provision is unviable, clear evidence to this effect needs to be provided, and the statutory 10% requirement needs to be met. Any off-site provision should be provided in the immediate locality of the proposed development. The policy also stipulates that any development which is currently exempt from BNG will still be required to provide an ecological enhancement, commensurate to the scale of development involved. Government guidance is clear that LPA's should only seek more than the statutory requirement of 10% where there is robust evidence and justification to do so, and this does not appear to have been presented within the LPA's evidence base. Whilst the intentions of policy are noted, and The Estate would be in a position to deliver its own BNG on-site, the logistical requirement to provide 20% BNG is extremely onerous and the Combe Estate OBJECTS to the policy as currently worded. Experience of the current, nationally mandated requirement to provide 10% BNG already demonstrates how difficult the process of delivering BNG is, with very high levels of bureaucracy and delay associated with the process. Furthermore, where the delivery of BNG cannot be delivered on site (and it does not appear that EDDC have tested whether COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 all BNG requirements can be delivered on their allocated sites) the off-site costs of doing this are significant and can have a significant impact on viability. Doubling this requirement to 20% is only likely to add to the complexity and degree of difficulty with achieving the required level of BNG and to act as a particular disincentive to the delivery of much needed development. Combe Estate is of the view that this policy has not been positively prepared, is not justified and given the uncertainties surrounding the BNG process is not effective. BNG is already required to be delivered as a result of national legislation. Given that this requirement will remain and within the context of the concerns outlined above, we

would suggest that this policy is unnecessary, unsound and should therefore be amended to achieve 10% national requirements on major development.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Various - see pdf attachments

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.: See attachment

2(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: See attachment - insufficient information in evidence base to justify 20% AH

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To address any queries regarding the deliverability of the policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?:

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2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:

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2(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity chapter, please use this box to set out your comments.:

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3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: See attached representation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attached representation.

4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to address any queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Dorepark Ltd

Proposal: 13. Our Outstanding Biodiversity and Geodiversity

1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: PB05

3. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.: Please see attached representations.

3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Our Outstanding Biodiversity and Geodiversity chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

2. The Vision

1. To which part of the vision chapter does your representation relate?: Figure/Image

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: Figure 3

3. Do you consider that this part of the vision chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the vision chapter, please use this box to set out your comments.: Our client supports the settlement hierarchy and, in particular, the identification of Woodbury as a Tier 3 Local Centre. A dispersed approach to growth is the most appropriate strategy to meet the area's needs for housing and jobs.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? : No, I do not wish to participate in hearing session(s)

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Please refer to attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : To emphasise that the spatial strategy is flawed because sensible options for housing delivery around Cranbrook (but outside of the Cranbrook DPD area) have not been considered.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr B Penny

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Bell Cornwell LLP acts as planning consultant for Mr. Bruce Penny, the long standing owner of land to the south of Courtlands Lane. Land registry details (DN548773) show that Mr. Penny is the freehold owner of the site. His land currently benefits from a draft allocation for 12 dwellings under reference Exmo_23. The land is currently in agricultural use. Our client, therefore, has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Regulation 19. Consultation. CHAPTER 3. THE SPATIAL STRATEGY Strategic Policy SP01: Spatial Strategy Mr. Penny supports the overall approach of Strategic Policy SP01: Spatial Strategy which allocates Exmouth as a Principle Settlement for the district. The general strategy approach, which will see development allocations delivered at 5 different tiers of settlement in a dispersed approach to growth, is entirely appropriate and a sensible route to take. The identification of Exmouth as the principal settlement is supported. It is a logical choice given excellent range of facilities and is less environmentally constrained than many other towns in the district. The scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs. Similarly, it is important that the LPA meet there requirements under the NPPF to ensure that 10% of their allocations are delivered on small or medium sized sites as required by paragraph 73. Obviously small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should: a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare...” Mr. Penny’s site would represent

such an opportunity and being located outside of the AONB it is an eminently sensible allocation to meet this requirement at just under 0.5ha.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042)

REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1

INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 - 2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 3. THE SPATIAL STRATEGY Strategic Policy SP01: Spatial Strategy Acorn

Property Group supports the overall approach of Strategic Policy SP01: Spatial Strategy and, in particular, the support for development at the Local Centres (including Colyton) that meets local needs and the needs of those in the immediate surrounding areas. The dispersed approach to growth, which will see proportionate and much needed growth in a wide spread of settlements is the most appropriate strategy for the district. One of the failings of the current Local Plan (and part of the reason why the LPA have suffered from a lack of 5 year housing land supply in recent years) is due to the current strategy that sees the vast majority of delivery in a single location (e.g. Cranbrook) and in a new town which takes significant time to deliver. A more dispersed spatial strategy will provide a better opportunity for more varied housing stock and a potentially faster rate of housing delivery. Securing housing growth across a wide spread of settlements is the most

appropriate strategy for the district. ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 The adopted local plan did not focus sufficiently on existing towns and villages and an approach that looks to re-engage and deliver development at all tiers of settlement should be welcomed. Local centres like Colyton, with good levels of services and facilities can play an important role in housing delivery, and the current strategy takes a positive approach which will ensure the districts housing and employment needs are catered for.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: MR J PERSEY

REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border. Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03). Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 3. THE SPATIAL STRATEGY Strategic Policy SP01: Spatial Strategy Mr. Persey supports the overall approach of Strategic Policy SP01: Spatial Strategy which encourages development and housing allocations at service villages like Plymtree. The general strategy approach, which will see development allocations delivered at 5 different tiers of settlement in a dispersed approach to growth, is entirely appropriate and a sensible route to take. As service village, Plymtree (with its existing services, facilities and infrastructure) is well placed to take proportionate but much needed growth. The village has a good range of facilities (school, shop, village hall, pub) and is not environmentally constrained being entirely outside of the AONB. It ultimately has more facilities and is less environmentally constrained than many other villages in the district. Plymtree has appropriate facilities to receive an allocation, and the scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs. The current PAN number for the primary school shows that the school has capacity to accommodate more children, and additional development will help sustain village facilities. MR J

PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042)
REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2

Collectively, villages could make a meaningful contribution to the district's overall housing land supply and growth of this type would also have the advantage of diversifying supply, meeting local needs and supporting rural facilities. Securing housing growth across a wide spread of settlements is the most appropriate strategy for the district. One of the failings of the current Local Plan (and part of the reason why the LPA have suffered from a lack of 5 year housing land supply in recent years) is due to the current strategy that sees the vast majority of delivery in a single location (e.g. Cranbrook) and in a new town which takes significant time to deliver due to the heavy infrastructure requirements that exists with delivering housing in such locations. In our view, the current local plan did not focus sufficiently on existing towns and villages and an approach that looks to re-engage and deliver development at all tiers of settlement should be welcomed. Even small villages like Plymtree, have existing infrastructure (a school, a pub, a shop) that can provide services and facilities for a proportionate amount of growth and additional housing will support these facilities and prevent rural villages from falling into a 'sustainability' trap, where they are not allowed to grow or thrive. It is important to ensure that the new local plan can deliver sufficient supply to allow for choice and flexibility in the local market. The ability to deliver employment and housing in service villages is a positive approach which will ensure the districts housing and employment needs are catered for.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Strategic Policy SP01:

Spatial Strategy Combe Estate supports the overall approach of Strategic Policy SP01: Spatial Strategy and, in particular, the support for prioritising significant development at the Main Centres (including Honiton) that meets local needs and those in immediate surrounding areas. The general strategy approach, which will see development allocations delivered at 5 different tiers of settlement in a dispersed approach to growth, is entirely appropriate and a sensible route to take. As main centre, Honiton (with its existing services, facilities and public transport infrastructure) is well placed to take significant but proportionate much needed growth, and securing this growth across a wide spread of settlements is the most appropriate strategy for the district. One of the failings of the current Local Plan (and part of the reason why the LPA have suffered from a lack of 5 year housing land supply in recent years) is due to the current strategy that sees the vast majority of delivery in a single location (e.g. Cranbrook) and in a new town which takes significant time to deliver. COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 In our view, the current local plan did not focus sufficiently on existing towns and villages and an approach that looks to re-engage and deliver development at all tiers of settlement should be welcomed. Honiton can make a meaningful contribution to the district's overall housing land supply and growth of this type would also have the advantage of diversifying supply, meeting local needs and supporting rural facilities. Equally for employment development, sufficient provision must be made in the new local plan to support economic development right across the district so that growth is not stifled or lost to locations outside of East Devon. It is important to ensure that the new local plan can deliver sufficient supply to allow for choice and flexibility in the local market. The ability to deliver employment and housing in main centre locations is a positive

approach which will ensure the districts housing and employment needs are catered for.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Various - see pdf attachments

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.: see attachment

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attachment

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: See attachment

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your

suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attachment

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See attachment

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

-

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clyst Haven Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Please refer to the attached sheet.

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Please see attached representation.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : In order to address questions which might arise on housing delivery and the spatial strategy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Dorepark Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : In order that we can provide information on matters which are central to housing supply and spatial strategy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Dorepark Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Please see attached submission.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs Feast

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP01

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP02

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP03

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: MR J PERSEY

REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border. Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03). Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 3. THE SPATIAL STRATEGY Strategic Policy SP03: Housing Requirement by Designated Neighbourhood Area Mr Persey supports the overall approach of Strategic Policy SP03. This policy sets out the housing requirement figure for each designated neighbourhood area. It outlines the requirement for the period from April 2020 to April 2042. For Plymtree, this equates to 42 homes which will come from completions and allocations. The Designated Neighbourhood Area Housing Requirements Figures which are contained within the LPA evidence base (reference HOU-014) includes our client's land, Plym_03, which allocates 30 dwellings. This forms part of the overall housing requirement figure for the designated Plymtree Neighbourhood Area and confirms the importance of our client's site to meeting this target figure. It is therefore important for this site to be allocated to achieve this target. It should be noted that an outline planning application is currently submitted for this site. This application has the support of officers, and realistically, a reserved matters submission for the site could be expected later this year or early in 2026. Delivery of the site will therefore likely take place much faster than the timeline/schedule suggested in the EDDC evidence base

and the landowner is committed to delivery. We also note that the policy states that the figures expressed represent the minimum housing development in each of the Designated Neighbourhood Areas over the plan period. Proposals for MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 additional housing, including through allocations in neighbourhood plans to meet a specific local need will be supported where they are in accordance with other strategic policies in the Local Plan and supported by appropriate evidence. The fact that these figures are expressed as minimum targets is a positive approach to housing delivery which accords with guidance contained in the NPPF.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP03

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.: See attachment

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: See attachment

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your

suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See attachment

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

-

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP04

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Strategic Policy SP04:

Employment Provision and Distribution Strategy Combe Estate supports the overall approach of Strategic Policy SP04, which sees their land at Gitt_03 and Gitt_04 allocated for employment use. The Estate support the technical evidence base which has determined the quantum of new employment land proposed for Honiton. It is noted that this site is currently allocated in the adopted Local Plan, and the land within our client's control is entirely available for development. There is strong support for the allocation and our client is committed to seeing this allocation delivered. However, we note that within policy SP04 the uses allocated on designated sites are for B2, B8 and E(g) use. Whilst Combe Estate clearly support this allocation in principle, it is disappointing that the allocations or policy text within SP04 does not clearly allow for a wider disposition of land uses. For example, paragraph 3.21 of plan states that, "Particular attention is given to emerging technologies, green industries, and adapting to changes like increased homeworking and artificial intelligence." However, there appears to be very little, if any, content within the policy that makes provision for a wider range of employment opportunities beyond traditional office and industrial uses.

COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 As such, Combe Estate would suggest that a wider range of employment generating uses should be defined within Policy SP04 to allow for a changing employment market and to ensure that East Devon District as a whole is able to respond and provide employment accommodation that reflects a modern economy. In summary, while Combe Estate support the allocation of their land, there needs to be greater acknowledgement of the changing nature of employment activity, with amendments to policy to include:

- Giving equal/greater weight to other Class E uses (not just E(g) within in the policy.

- Include a policy clause that would allow flexibility to deliver more than ‘traditional’ employment uses where there is evidence to suggest this is appropriate (e.g. a need for other leisure, tourism, community uses)

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estate

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP04

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.: See attached

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: there is insufficient flexibility on the definition of employment uses - they should be broader than traditional B2, B8 and E(g) use classes - see attached document.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified

above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

-

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP04

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. : To highlight the suitability and availability of our client's land in Woodbury to facilitate the growth and expansion of Woodbury Business Park - a well-established, popular and successful local employment site - to help provide a resilient local rural economy and prevent out-commuting to Exeter.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs Feast

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP04

3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.: ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 - 2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 3. SPATIAL STRATEGY Strategic Policy SP08: Phased Delivery of Infrastructure and Services Strategic Policy SP08 includes a requirement for any developments to be brought forward in phases to be designed so that each phase or parcel provides pedestrian, cycling and vehicular access up to the boundaries of each development parcel/phase. Such developments shall also ensure that all services including electricity, water, sewerage, broadband and district heating services (where applicable) are also delivered up to the boundaries of each phase or parcel. This is a sensible policy to include, which can give housebuilders flexibility to build in phase to deliver across the plan period. It will allow both above and below ground services and infrastructure link up between different parcels of phased developments to ensure that no party is held to ransom by another at the expense of the quality of the development, and to minimise disruption in the delivery of adjoining phases or parcel.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: Strategic Policy SP08:

Phased Delivery of Infrastructure and Services Strategic Policy SP08 includes a requirement for any developments to be brought forward in phases to be designed so that each phase or parcel provides pedestrian, cycling and vehicular access up to the boundaries of each development parcel/phase. Such developments shall also ensure that all services including electricity, water, sewerage, broadband and district heating services (where applicable) are also delivered up to the boundaries of each phase or parcel. This is a sensible policy to include, which can give housebuilders flexibility to build in phase to deliver across the plan period. It will allow both above and below ground services and infrastructure link up between different parcels of phased developments to minimise disruption in the delivery of adjoining phases or parcels of land.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Various - see pdf attachments

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP08

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Spatial Strategy chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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3. Do you consider that this part of the Spatial Strategy chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:

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3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:

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3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Spatial Strategy chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary. :

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Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to address queries in relation the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?:

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2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

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2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: WS01 is sound.

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.:

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3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Dorepark Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To have the opportunity to discuss matters which are relevance to the delivery of the Council's housing supply and spatial strategy.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs Feast

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the unjustified approach of including our client's land within the Clyst Valley Regional Park boundary.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs T Adams

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the unjustified approach of including our clients' land within the Clyst Valley Regional Park boundary.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to address any questions about the nature of Darts Farm operations, its future plans and the deliverability of the policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

2. Do you consider that this part of the Development at the West End chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: Please see attached representations.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached representations.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to provide the Inspector with more information as required on Darts Farm operation and the services and businesses it supports.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS15

2. Do you consider that this part of the Development at the West End chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development at the West End chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: See attached representation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attached representation.

4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: We wish to have the opportunity to participate in order to provide more information on the nature of Dart's Farm interests and to explain the economic benefits associated with it.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Various - see pdf attachments

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?:

-

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

-

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?:

-

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?:

-

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr B Penny

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Bell Cornwell LLP acts as planning consultant for Mr. Bruce Penny, the long standing owner of land to the south of Courtlands Lane. Land registry details (DN548773) show that Mr. Penny is the freehold owner of the site. His land currently benefits from a draft allocation for 12 dwellings under reference Exmo_23. The land is currently in agricultural use. Our client, therefore, has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Regulation 19. Consultation. CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES Strategic Policy SD01: Exmouth and its development allocations Mr Penny supports the allocation of Land to the South of Courtlands Lane (Exmo_23) for allocation which is land in Mr. Penny's control. The allocation as drafted states: "This land, south of Courtlands Lane, will form a small-scale development on the northern side of Exmouth to accommodate around 12 new homes. The scheme will need to demonstrate how safe pedestrian access, avoiding on-road walking, will be achieved to surrounding and neighbouring areas." The objectives of this policy can be delivered, and the site is currently the subject of a planning application. The land is immediately available for development. The wider technical work that underpins the promotion of the site – which has previously been submitted at regulation 18 stage demonstrates the following:

- A landscape led approach to design and layout - perimeter hedgerows retained with ecology buffers retained as required. Additional planting proposed to provide structural planting in the landscape as mitigation for development – see landscaping plan produced by landscape architect submitted at Reg.18 stage.
- Suitable and safe access is available to serve 12 dwellings - see accompanying transport report. Submitted at Reg.18 stage. MR B PENNY REPRESENTATIONS ON THE

EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT
(MARCH 2025) BY BELL CORNWELL LLP 2

- Housing can be delivered without harm to landscape character and the setting of nearby heritage assets.
- The client owns wider land holding (see location plan) and connectivity could be delivered to the Estuary Trail if required.
- The site is excellently located to benefit from public transport (bus services) at the end of Courtlands Lane which run frequently (every 15 minutes) between Exmouth and Exeter. The proposed allocation is supported and justified, and we would ask officers to note that the current settlement boundary as drawn could comfortably provide for 12 dwellings. We would also ask officers to note that Mr. Penny has further land within its control that could be used for the other potential benefits, including additional housing.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD01

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representation.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to address questions about deliverability of the Council's strategy and housing supply.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD03

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

On behalf of Combe Estates

INTRODUCTION Combe Estate are long standing generational owner of large areas of agricultural and forestry land within East Devon. Their land interests are primarily in Honiton and Gittisham. As part of its interests, the Estate undertakes residential and commercial development and are the owners of Combe Garden Centre. The Estate therefore has a wide range of land and business interests within the district. The Estate has provided representations to the Council as part of previous consultations on the draft local plan and via the related call for sites process. Given the nature of their long-standing presence in the district, The Estate is an important local stakeholder with allocation interests within the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES Strategic Policy SD03: Honiton and its Development Allocations Combe Estate supports the development allocations for Honiton listed in Strategic Policy SD03 and identified on the Policies Map, particularly Land west of Hayne Lane (site reference Gitti_03, Gitti_04 and Gitti_05) for which they have existing land interests. They are also part owners of Land adjacent to St Michael's Church (site reference Honi_07). The Estate are committed to seeing both of their sites and respective allocations delivered. Site Specific – Gitt_03, Gitti_04 and Gitt_05 The inclusion of Gitti_03, Gitti_04 and Gitti_05 for mixed use development is clearly supported as its represents a logical approach to development and growth to the west of Honiton, noting:

- the position of Honiton within the settlement hierarchy for East Devon;

- the sustainable transport options and overall level of services and facilities in the town;
- the proximity of the site to the A30 COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2
- The location of the site relative to existing jobs and food retail provision within the town of Honiton;
- The constraints that exist elsewhere in the settlement (for example this site can be delivered entirely outside of the AONB). Strategic Policy SD03 is considered to be sound, though we would recommend some modest tweaks/changes to wording. The specific policy allocating Gitti_03, Gitti_04 and Gitti_05 states; “Land west of Hayne Lane (Gitti_03, Gitti_04 and Gitti_05) Land to the west of Hayne Lane, on the western side of Honiton, is allocated for a mixed-use development to provide: A. 310 homes; and B. 14.6 hectares of land to accommodate employment and community uses. This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented. Southern parts of the site are in the East Devon National Landscape and this area will require very careful design to take account of its landscape setting. On the western edges the site is close to the historic village of Gittisham and particular sensitivity will need to be attached to preventing adverse heritage impacts. These southerly and westerly parts will be best suited for open space uses. Commercial and employment uses will need to be concentrated to the north of the railway line bisecting the site with residential uses to the south. Community facilities, to include a shop or shops and a hall, will need to be provided within or next to 84 residential parts of the development. There will be the need for attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site (ideally utilising an existing passage under the railway that lies in a roughly mid-way point in the allocation). It is expected that vehicular access to the residential development will be via the existing estate to the north (i.e. via Meadow Acre Road). Vehicular access to the employment development will need to come via Hayne Lane. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes, including bus services.” In terms of the objectives of the policy we would draw attention to the masterplan submitted in support of the current representation. We would ask that it is noted that: COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 3
- The Estate are committed to seeing the site delivered for a minimum of 310 homes.

- The Estate are committed to delivering the area of land to the north of the allocation which comprises part of the 14.6 hectares of employment and community uses (note part of this is land owned by EDDC) – however, additional flexibility should be built into the definition of uses permitted in this part of the policy to include wider commercial uses and leisure uses.
- The need for masterplanning of the sites is noted, and this can be controlled in-part, through an outline planning application.
- The development can be accommodated without being located within the East Devon National Landscape and account can be taken of landscape setting.
- Similarly, the evolving masterplan takes account of the topography and proximity of the historic village of Gittisham on the western edge the site which has taken account of topographical features and heritage assets.
- Both of the areas above can be utilised for BNG delivery and open space to ensure appropriate setting is retained for heritage assets and landscape designations.
- The Estate are happy to provide community facilities, to include a shop or shops and a hall as part of any wider masterplanned development.
- The importance of attractive and safe pedestrian and cycle linkages between the southern and northern parts of the site are also noted and deliverable.
- In terms of vehicular access to the residential development – this should not be solely from Meadow Acre Road – which is located within an adjacent development. Access will be available from Hayne Lane (as per transport / access notes submitted at the Reg.18 stage) and shown on the masterplan, with a secondary route potentially available from Higher Ash Close. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base. Site Specific – Honi_07 The Estate are in control of land identified as Honi_07 – this was previously put forward as an allocation for 30 dwellings in previous versions of the plan. The client's land can be accessed directly from Waterleat Avenue to the north. During the preparation of the Regulation 19. Version of the Local Plan, Members have decided to allocate Honi_12 (land east of Cuckoo Down Lane) as additional development land. This site is landlocked and access would need to come through our client's land for delivery. Our client has no objection to the principle of this approach, but, given Honi_07 is road fronting this part of the allocation will need to come forward first to facilitate access to the wider development. COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 4 As drafted, the allocation states: Land adjacent to St Michaels Church and south east of Cuckoo Down Lane (Honi_07 and Honi_12) This land is allocated for 101 homes and will form a

residential extension on the southern side of Honiton. The site is in the Blackdown Hills National Landscape area and close to heritage assets, it will require very careful design to take account of its landscape setting and the setting of surrounding heritage assets. Therefore a high quality comprehensive development scheme is required for the whole site. Development within allocation Honi_12 is expected to be dependent on development within allocation Honi_07 coming forward, as access needs to be from Weatherill Road. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes.” As drafted, the policy notes the different land ownerships and clearly Honi_07 will need to come forward first to secure access to Honi_12. Our client is also aware that Honiton Town Council may object to Hon_12 (the additional land beyond our client’s ownership) as an allocation through this process. This has been reported prior to the consultation on this stage of the Local Plan. Should this be the case, and any further objections raised to the wider allocation, our client would also be prepared to deliver their site as a single allocation for circa 30 dwellings, which previous proofing layouts provided with our reg 18. Submission (and submitted again now for completeness) show can be accommodated on the site. However, we wish to stress that the site can also come forward as part of a first phase of larger development for circa 101 houses if this is felt appropriate. The key issues to stress here, is that The Estate’s land is deliverable. Technical work undertaken to date demonstrates the site is deliverable and it be delivered as a first phase of comprehensive development with the ability to connect to adjacent land parcels. Summary Position / Conclusion Combe Estate are of the view that both of their allocated sites represent sustainable development, and these are deliverable and suitable site for residential led mixed use development that will help meet the overall housing needs in Honiton and East Devon. COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 5 It will provide much needed housing and new employment space for growth in the main centre of Honiton. The site will also assist in meeting affordable housing requirements in the town and the wider East Devon area where there is significant under supply. Both sites are immediately available for development and The Estate are committed to seeing the sites delivered for their allocated uses. The Estate generally support the Council’s approach to the spatial strategy and residential land allocations and consider that these are sound, justified and positively planned. However, the drafting of some of the policy could be clarified through the provision of further detail whilst some policies will benefit from the inclusion of more flexibility. Combe Estate’s key comments on the allocations they are promoting through the Regulation 19 Publication Draft can be summarised as:

- Honiton is suitably identified as a ‘main centre’ in the settlement hierarchy and is rightly a location for significant growth.

- Combe Estate are supportive of the direction of strategic employment policy and will deliver the allocation that has been proposed on their land – however, the definition of ‘employment’ should not be too narrow, and there should be the ability to include a variety of alternative uses (including a wider range of commercial and tourism based uses) to recognise the modernisation of the East Devon job market and to ensure that East Devon is not prevented from embracing new and emerging businesses to the area.
- Affordable housing percentages for allocated sites need to be closely appraised and set as low as is reasonably possible to ensure development is viable – this is particularly relevant in Honiton where current AH levels on open market schemes are sought at 25% and with this percentage figure increasing with the next Local Plan.
- Where masterplans are proposed for strategic allocations, further guidance/clarification is needed on these matters – could this not be addressed through a planning application (outline) rather than a masterplan/design code approach?
- BNG requirements should be amended to form a consistent position with national policy on its’ delivery e.g. 10% should be sought rather than 20%.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP

1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations.

CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES

Strategic Policy SD09: Development Allocations at Colyton Acorn Property Group supports the development allocations for Colyton listed in Strategic Policy SD09 and identified on the Policies Map, particularly Land at Hillhead (site reference Coly_02) for which they have existing land interests. Acorn is the housing developer who will build out the site and deliver the housing specified. The inclusion of Coly_02 for residential-led development is clearly supported as it represents a logical approach to development and growth to the south of Colyton (in an un-designated landscape) noting the constraints that exist elsewhere in the settlement. The specific policy allocating Coly_02 states; “Land at Hillhead (Coly_02) This site, to the west of Colyton, is allocated for 49 new homes. In order to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC and bat activities, suitable avoidance or mitigation measures

will need to be identified and implemented. Approach roads to this site are narrow, largely ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 single width, and as such highway improvements may be needed with potential rerouting needed through the site.” On these technical points we would ask it to be noted that:

- Appropriate ecological mitigation will be provided to ensure no adverse effect on the integrity of the Beer Quarry and Caves SAC will occur.
- Whilst noting highway improvements are suggested within the policy, studies undertaken by the applicant confirm that the site is entirely deliverable from a highways perspective. DCC Highway comments in the site assessment work undertaken by the Council confirms that appropriate access can be delivered to the site. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD09

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.: see attached

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
see attached

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: see attached

4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to address queries in relation to the delivery of this site.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD11

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the suitability and availability of our client's land in Woodbury for residential-led development and employment development.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to address queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD14

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:

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2(a). If yes, and you wish to support the legal compliance of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
See attached representation.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

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3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?:

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4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It will be important to have the opportunity to participate in order to address any queries which might arise about the ability of development proposed under this policy to be delivered.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD16

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to address queries relating to the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD17

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:
Please see attached representations.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to address any queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD23

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:
Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To address any queries regarding the deliverability of this policy.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD25

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

On behalf of MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border. Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03). Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 5. DEVELOPMENT IN THE TOWNS AND VILLAGES Strategic Policy SD25: Development Allocation at Plymtree Mr Persey supports the development allocation for Plymtree listed in Strategic Policy SD25 and identified on the Policies Map, as "Land north of School - site reference Plym_03)". Mr Persey is the owner of the site, and the land is immediately available for development. The applicant is committed to seeing their site and respective allocation delivered. The inclusion of Plym_03 for residential development is clearly supported as it represents a logical approach to development and growth to the village of Plymtree. It is centrally located to services and facilities and is most appropriately located to assimilate with the built form of the village. The specific policy allocating Plym_03 states; "Land is allocated for 30 new homes and a community facility. This site is particularly sensitive in heritage terms and detailed assessment will be needed to ensure that an acceptable design solution is reached that respects the special character of the area and the setting of the heritage

assets around the site. Footpath links to local facilities will be required as part of the development. The development will need to maximise opportunities for localised improvements/ contributions to enhance sustainable travel modes..” MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 On these technical points we would ask it to be noted that:

- Outline planning application 23/1247/MOUT for 30 dwellings is currently being considered by officers and has support. At the time of submitting these representations the scheme is heading to planning committee with an officer recommendation for approval.
- The scheme confirms that 30 dwellings can be accommodated without detriment to ecology and heritage issues and is technically sound in all respects.
- Footpath connections will be provided to link the site to various parts of the village and safe and suitable access exists for the site. As such, the allocation of the site for residential development is sound and supported by appropriate officer assessment in the submitted evidence base.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise viability concerns relating to the levels of affordable housing proposed.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr B Penny

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Bell Cornwell LLP acts as planning consultant for Mr. Bruce Penny, the long standing owner of land to the south of Courtlands Lane. Land registry details (DN548773) show that Mr. Penny is the freehold owner of the site. His land currently benefits from a draft allocation for 12 dwellings under reference Exmo_23. The land is currently in agricultural use. Our client, therefore, has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Regulation 19. Consultation. CHAPTER 8: MEETING HOUSING NEEDS Strategic Policy HN02: Affordable Housing Strategic Policy HN02 sets out the Council's proposed approach to the provision of affordable housing as part of new development. In summary, it proposes that affordable housing be provided on housing schemes of six or more dwellings in designated rural areas and 10 or more in non-designated rural areas. In Exmouth, housing allocations will be required to deliver 30% affordable housing. Mr Penny supports the approach in Policy HN02 which would require their land interests at Exmouth to deliver a level of affordable housing relative to "value area" in which Exmouth is located – noting that the towns of Sidmouth and Budleigh will be required to deliver a higher rate of 35% affordable housing. However, the current affordable housing requirement in Exmouth under the extant Local Plan is for 25% affordable housing to be delivered. The current local plan set affordable housing policy in a period that pre-dated a variety of issues that have affected the housing market in the last five years – including post pandemic effects and other economic shocks which collectively have substantially increased borrowing and construction costs. It is well recognised that these impacts, along with the increased technical requirements associated with development (notably in relation to, for example, biodiversity net gain and flood risk) and significant delays in the planning

process have had direct effects on the viability of housing schemes. We note that Core Submission Document CSD-04 (East Devon Local Plan Viability Assessment) suggests that with the exception of Axminster, 35% affordable housing provision is generally viable, MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 but that 30% requirement is currently proposed for Exmouth and is suggested to “provide additional viability headroom to meet additional costs.” Obviously, a precautionary approach to viability is important to give developers flexibility and room to manoeuvre in an uncertain market. However, in order to achieve the level of affordable housing requirement set out in the policy, it is critical that it is demonstrably viable to do so. It is unclear whether the Local Housing Need Assessment which underpins the Local Plan is supported by any viability assessment, and given the proposed affordable housing targets are generally higher than the requirements in the current Local Plan, it is essential that this is tested through detailed viability. This should be done before examination to avoid delays during the examination - taking the lessons learned from the viability sessions of the Cranbrook Plan DPD as an example. At present, it is unclear whether sufficient testing has been undertaken to confirm the thresholds of affordable housing set out are viable and further infrastructure costings required to ensure the LPA have a robust position. We would therefore question soundness at the current time.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. We attach a plan that shows this land (please refer to the Appendix A document) submitted. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests in the proposals in the East Devon Local Plan for future development in the district. Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 8: MEETING HOUSING NEEDS Strategic Policy HN02: Affordable Housing Strategic Policy HN02 sets out the Council's proposed approach to the provision of affordable housing as part of new development. In summary, it proposes that affordable housing be provided on housing schemes of six or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The amount of affordable housing to be sought is to vary according to location. For most allocated sites, including the land which is of interest to our client at Hillhead, Colyton, the policy seeks 30% affordable housing. Subject to further testing, Acorn Property Group could support the approach in Policy HN02 which would require this level of provision. However, we note that Core Submission Document CSD-04 (East Devon Local Plan Viability Assessment) suggests that with the exception of Axminster, 35% affordable housing is generally viable on

allocated sites, but that 30% affordable requirement for allocations outside the West End and ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 Budleigh Salterton-Sidmouth/Sidford (such as Colyton) provides additional viability headroom to meet additional costs. A precautionary approach to viability is important and important to give developers flexibility and room to manoeuvre in an uncertain market – a variety of issues have affected the housing market in the last five years including post pandemic effects and other economic shocks and which collectively have substantially increased borrowing and construction costs. It is well recognised that these impacts, along with much the increased technical requirements (notably in relation to, for example, biodiversity net gain and flood risk) and significant delays in the planning process have had direct effects on the viability of housing schemes. However, in order to achieve the level of affordable housing set out in the policy, it is critical that it is demonstrably viable to do so. It is unclear whether the Local Housing Need Assessment which underpins the Local Plan is supported by any viability assessment, and given the proposed affordable housing targets are generally higher than the requirements in the current Local Plan, it is essential that this is tested through detailed viability. This should be done before examination to avoid delays during the examination (taking the lessons learned from the viability sessions of the Cranbrook Plan DPD as an example). At present, it is unclear whether sufficient testing has been undertaken to confirm the thresholds of affordable housing set out are viable and further infrastructure costings required to ensure the LPA have a robust position.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: MR J PERSEY

REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border. Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03). Against this background, Bell Cornwell LLP has reviewed the policies and information set out in the East Devon Local Plan (2020 -2042) Regulation 19 Consultation Draft and makes the following representations. CHAPTER 8: MEETING HOUSING NEEDS Strategic Policy HN02: Affordable Housing Strategic Policy HN02 sets out the Council's proposed approach to the provision of affordable housing as part of new development. In summary, it proposes that affordable housing be provided on housing schemes of six or more dwellings in designated rural areas and 10 or more in non-designated rural areas. In Plymtree, housing allocations will be required to deliver 30% affordable housing. We note that Core Submission Document CSD-04 (East Devon Local Plan Viability Assessment) suggests that with the exception of Axminster, 35% affordable housing is generally viable, but that 30% requirement is currently proposed for Plymtree and is suggested to "provide additional viability headroom to meet additional costs." A precautionary approach to viability is important and important to give developers flexibility and room to manoeuvre in an uncertain market – a variety of issues have affected the housing market in the last five years including post pandemic effects and other economic shocks and which collectively have substantially increased borrowing and construction costs. It is well recognised that these impacts, along with much the increased technical requirements (notably in

relation to, for example, biodiversity net gain and flood risk) and significant delays in the planning process have had direct effects on the viability of housing schemes. MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 In order to achieve the level of affordable housing requirement set out in the policy, it is critical that it is demonstrably viable to do so. It is unclear whether the Local Housing Need Assessment which underpins the Local Plan is supported by any viability assessment, and given the proposed affordable housing targets are generally higher than the requirements in the current Local Plan, it is essential that this is tested through detailed viability. This should be done before examination to avoid delays during the examination (taking the lessons learned from the viability sessions of the Cranbrook Plan DPD as an example). At present, it is unclear whether sufficient testing has been undertaken to confirm the thresholds of affordable housing set out are viable and further infrastructure costings required to ensure the LPA have a robust position.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: On behalf of Combe Estate

Strategic Policy HN02: Affordable Housing Strategic Policy HN02 sets out the Council's proposed approach to the provision of affordable housing as part of new development. In summary, it proposes that affordable housing be provided on housing schemes of six or more dwellings in designated rural areas and 10 or more in non-designated rural areas. In Honiton, housing allocations will be required to deliver 30% affordable housing. Combe Estate support the approach in Policy HN02 which would require their land interests at Honiton to deliver a level of affordable housing relative to "value area" in which Honiton is located – noting that the towns of Sidmouth and Budleigh will be required to deliver 35% affordable housing. However, the current affordable housing requirement in Honiton under the extant Local Plan is for 25% affordable housing to be delivered. This current plan set affordable housing positions in a period that pre-dated a variety of issues that have affected the housing market in the last five years including post pandemic effects and other economic shocks and which collectively have substantially increased borrowing and construction costs. It is well recognised that these impacts, along with much the increased technical requirements (notably in relation to, for example, biodiversity net gain and flood COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 risk) and significant delays in the planning process have had direct effects on the viability of housing schemes. We note that Core Submission Document CSD-04 (East Devon Local Plan Viability Assessment) suggests that with the exception of Axminster, 35% affordable housing is generally viable on allocated sites, but that 30% requirement is currently proposed for Honiton and is suggested to "provide additional viability headroom to meet additional costs." Obviously, a precautionary approach to viability is important to

give developers flexibility and room to manoeuvre in an uncertain market. However, in order to achieve the level of affordable housing requirement set out in the policy, it is critical that it is demonstrably viable to do so. It is unclear whether the Local Housing Need Assessment which underpins the Local Plan is supported by any viability assessment, and given the proposed affordable housing targets are generally higher than the requirements in the current Local Plan, it is essential that this is tested through detailed viability. This should be done before examination to avoid delays during the examination (taking the lessons learned from the viability sessions of the Cranbrook Plan DPD as an example). At present, it is unclear whether sufficient testing has been undertaken to confirm the thresholds of affordable housing set out are viable and further infrastructure costings required to ensure the LPA have a robust position. We would therefore question soundness at the current time.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Various - see pdf attachments

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: See attachment

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: See attachment - we would suggest that that viability needs to be looked at carefully, and AH should be at the

lower end of thresholds - the viability work is incomplete, and does not test this issue sufficiently.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: further viability testing needs to be undertaken with more detailed infrastructure plan.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to address queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:
No

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: See attached representation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attached representation.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

-

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to address any queries about deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.: See attached representation.

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.:

-

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: We wish to be able to participate in order to provide information to the inspector on matters of importance to rural employment owners.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): GB House and Son

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the importance to the local rural economy of supporting the expansion of existing employment sites.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Glanvill Partners Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE03

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?:

-

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.:

-

2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.:

-

2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

-

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.:

-

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached sheet.

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?:

-

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

-

4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise the cruciality of local farming businesses having the ability to diversity without overly-restrictive development management policies.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE03

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To address any queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE09

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To address any queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Clinton Devon Estates

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to be able to address any queries regarding the deliverability of this policy.

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr and Mrs Feast

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE10

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)