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Planning Policy Team
East Devon District Council
Blackdown House
Border Road
Honiton
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28th March 2024

Delivered by email to: (planningpolicy@eastdevon.gov.uk)

Dear Sir/Madam,

MLPD 18001 21016 24001 Representations on Behalf of Stuart Partners Ltd to Regulation 16 Clyst Honiton Neighbourhood Plan (2023-2031) Submission Version (January 2024)

Background

We represent Stuart Partners Ltd (“Client”) which owns and controls significantly more than 500 acres in and adjacent to Clyst Honiton parish including the strategically important Hill Barton Business Park and, together with Bloor Homes South West Ltd, most of the land earmarked for a New Town in emerging strategic planning policy.

These representations should be read together with representations made by Turley on behalf of our Client and Bloor Homes South West Ltd.

Stuart Partners Ltd is a local company with a diverse business portfolio based around agriculture, land, renewable energy, residential development land and employment delivery all contributing considerably in excess of 1,000 jobs and £100 Million Gross Value Added (GVA) into the East Devon and sub regional economies.

To thirds of East Devon district is covered (rightly) in restrictive national planning policy designations. The Council has abandoned the Greater Exeter Strategic Plan (GESP) and has taken the conscious decision to delay its Local Plan production meaning that there is no strategic planning policy framework for the area. The Local Plan is 5 years old and is “out of date”.

The Council’s higher tier decision taking (bolstered by previous strategic planning policy informed by Sustainability Appraisals) concludes that Clyst Honiton Parish and our Client’s land sit in *“the least constrained part of the district for accommodating... [strategic housing and employment]... growth... [because it is]...land..[which]...is relatively flat with no landscape designations...[and which]... is well served by main roads with good vehicle access via the M5, A30, A3052 and A376 and has good existing public transport links with the railway line and existing bus routes...”*

In other words, the spatial context is:

- there is a strong likelihood that land in Clyst Honiton parish will be allocated in the next series of planning policies for strategic housing and employment development because it is in the most sustainable location to accommodate such growth.

Housing and Employment Land Supply and Delivery

East Devon District Council (EDDC) cannot demonstrate an adequate supply of housing or employment land. Neither can Exeter City Council (ECC). Sub regionally, therefore, there is not enough strategic housing land or enough employment land to meet existing needs, let alone future needs.

Exeter’s growth is severely constrained, and it is probable, in our Client’s view, that some of its housing and employment needs will have to be accommodated in the “West End” of East Devon (where Clyst Honiton is), mainly because neighbouring authorities have a “duty to cooperate” (DTC) to ensure that cross boundary strategic development needs are met in the most appropriate (i.e., in the most sustainable) locations.

Regulation 16 Clyst Honiton Neighbourhood Plan (Submission Version)

Thank you for the opportunity to comment on the Regulation 16 Clyst Honiton Neighbourhood Plan (2023-2031) Submission Version.

Our Client welcomes the acknowledgement within para. 2.3 that *“the NP Area is in a strategically important location for Devon, where land, forms part of the most sustainable options for accommodating future growth for both local housing and employment and for large strategic scale development/infrastructure as has been identified in the Emerging EDLP.”*

EDDC’s emerging Local Plan (Strategic Policy 8) indicates that our Client’s land is within an area identified for growth as part of the preferred New Town proposal. This was further confirmed at a Strategic Planning Committee (5th December 2023) where Officers recommended that Members agree that *“option 1 [which includes our Client’s land] forms the Council’s preferred approach for a further new community and the consultant group should be instructed to progress their work in master planning this option, developing a preferred delivery model and business case”*.

Policy 8 proposes, up to 2040, 2,500 new homes and 17.5ha of employment land. Moreover, it proposes 5,500 new dwellings beyond 2040 together with 38.5ha of employment land. The preferred New Town subject to Policy 8, and the emerging Masterplan shows a development bookended by two strategic employment sites, an expanded Hill Barton Business Park; and land at the A30 to the south of the Exeter Airport. We note (from EDDC Strategic Planning Committee Papers) that the Parish Council... *“supports the development of a New Town but wants to work with EDDC to ensure that the development is beneficial to local people and the environment.”*

One of the aims of the Neighbourhood Plans, as shown in Table 3.6.1. is to provide new businesses and employment. Yet, the Neighbourhood Plan policies which support employment development in the Plan Area look to specifically exclude Hill Barton Business Park. The justification for this relies on policy E7 of the adopted Local Plan (and the Villages Plan), which is at odds with the Local Planning Authority (LPA)’s preferred strategy for delivering the scale of housing and employment required in East Devon (and the sub-region).

As above, the Neighbourhood Plan acknowledges that the Plan Area is in a strategically important location for Devon, with land which forms part of the most sustainable options for accommodating future growth for both local housing and employment and for large strategic scale development/infrastructure. To reflect this, neighbourhood plan policies should support development opportunities at Hill Barton based on its location alongside the preferred option for a New Town and within the western part of East Devon, which is a focus for development within the emerging Local Plan.

The evidence from EDDC's (and ECC's) own studies indicates that there is neither close to enough housing land nor close to enough employment land being released or being earmarked, sub regionally, to meet either existing or future needs. In light of this, the expansion of Hill Barton Business Park in the short term is clearly necessary to deliver much needed employment land in the right place and the right time for the sub region fully in line with emerging strategic policies. Whilst the Neighbourhood Plan acknowledges the important location of the Parish within the sub region (which is welcomed), it does not acknowledge that the expansion of Hill Barton Business Park in the short term is clearly necessary.

The plan should be corrected in this vein.

If you require further information about specific aspects of the representations made, please contact us at the above address.

Thank you

Yours faithfully

James

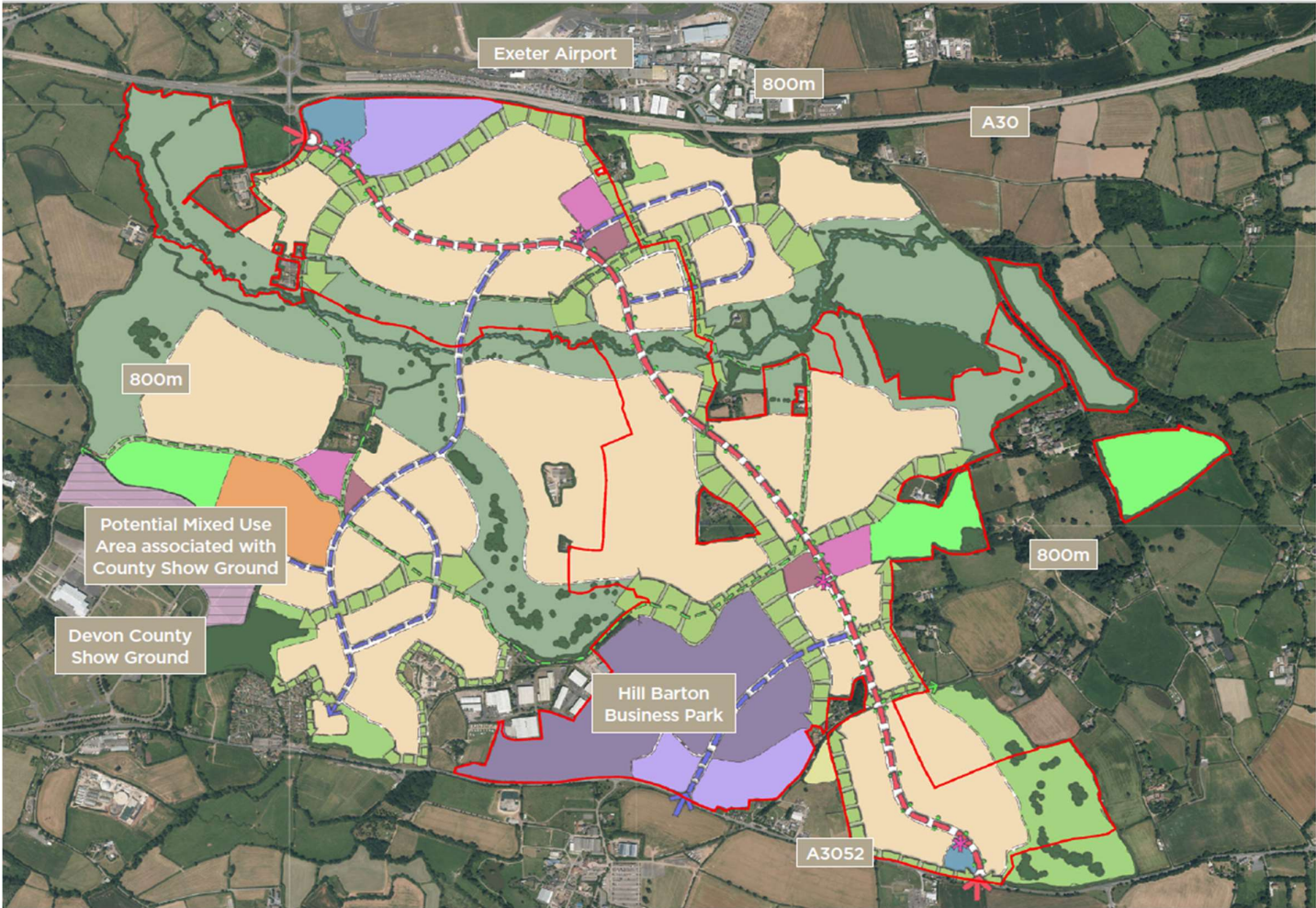
James McMurdo MRTPI MRICS

Director

For and on behalf of McMurdo

Copies: Client; Turley; Bloor

APPENDIX 1. SITE CONTEXT (DENBOW MASTERPLAN)



APPENDIX 2. EDDC LOCAL PLAN 2020-2040 WESTERN SIDE OF EAST DEVON POLICY MAP (HILL BARTON SITE OUTLINED RED)

