
From: James McMurdo [REDACTED]
Sent: 24 February 2020 18:33
To: Planning Policy
Cc: Catherine Baddeley
Subject: Representations on the FDraft Affordable Housing Supplementary Planning Document SPD January 2020 (McMurdo Ref 18001) on Behalf of Stuart Partners Ltd (Mr T Stuart) 24 February 2020
Attachments: 1830 24 02 20 Final Draft Letter for EDDC Affordable Housing SPD 2020[2].pdf

Dear Sirs

Representations on the Draft Affordable Housing Supplementary Planning Document SPD January 2020 (McMurdo Ref 18001) on Behalf of Stuart Partners Ltd 24 February 2020

Delivered by email to planningpolicy@eastdevon.gov.uk

On behalf of our client Stuart Partners we welcome the opportunity to comment on East Devon District Council's Draft Affordable Housing Supplementary Planning Document (SPD) which is being consulted on until 5 pm on Friday 28 February 2020.

Our client is represented by Turleys (who also represent Bloor) with regard to their land at Denbow. Turleys will make separate representations to this draft on key issues including:

1. Benchmark Land Value; and,
2. Overage Clauses.

Our representations should be read together with those made by Turleys.

We trust that you'll take the content of the attached letter into account and should you need clarification on any matter please contact us.

Thank you for the opportunity to comment.

Yours faithfully

James

James McMurdo MRTPI MRICS

Director

McMurdo Land Planning and Development Ltd
a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL



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24th February 2020

Dear Sir/Madam,

Representations Draft Affordable Housing Supplementary Planning Document (SPD) on Behalf of Stuart Partners Ltd February 2020

On behalf of our client, Stuart Partners Ltd, which has significant land and other interests across East Devon, we welcome the opportunity to comment on East Devon District Council's Draft Affordable Housing Supplementary Planning Document (SPD).

For their land at Denbow, our client will be represented by Turleys which will make separate comments on key issues relating to, amongst other things:

1. Land Value; and,
2. Overage.

Our representations should be read together with those made by Turleys.

1. Thresholds

Our client supports the approach set out in relation to thresholds in so far as it would:

- align with the National Planning Policy Framework (NPPF); and,
- allow applicants to justify circumstances where it would not be appropriate to meet Local Plan affordable housing targets.

Our client objects to the approach set out in relation to thresholds in so far as it would:

- contain an "at least 66%" figure for exception sites...outside built-up area boundaries (our client objects particularly in relation to land in and around the "West End" of East Devon) because such an approach would hamper delivery of housing in the right locations at the right times ¹ and would be at odds with the NPPF.

¹ We cite, in particular, the Council's own work on viability which sits behind the Cranbrook Plan (zero CIL and only 15% affordable).

2. Land Values and Overage

Benchmark Land Value

Our client welcomes the addition of wording on determining an acceptable return for landowners (regard would be had to up to date evidence of land values, case law, and Government policy and guidance).

Overage Clauses

Our client objects to the gist of the draft policy as it stands largely because it would be unworkable in practice: it proposes that viability information should be provided post completion which would be an overly onerous and challenging process to undertake and manage, especially when considering strategic development which involves major risk over time (which would have to be quantified), (usually) multiple developers, (normally) different infrastructure provided by different parties, and (quite often) grant funding, all within multi-phased cashflow periods over changing market conditions.

Generally

The draft policy does not make clear that cost of infrastructure could represent a valid reason for the Council accepting reduced levels of affordable housing on a site (adopted; or not, in certain circumstances).

3. Off Site Provision

Our client supports the approach set out in relation to offsite provision because it would:

- allow for affordable housing to be provided off-site; and,
- allow for a monetary contribution in lieu of affordable housing on site.

4. Brownfield Land

Our client objects to the approach set out in relation to the re-use of brownfield land because it implies that the Council would consider not applying the VBC if it could do so.

5. Phasing and Dispersal

Our client objects to the approach set out in relation to the phasing and siting of affordable houses mainly because it fails to consider that many Registered Providers (RPs) would prefer larger clusters of affordable housing (larger clusters enable them (the RPs) to look after their stock more efficiently).

On behalf of our client, we thank you for the opportunity to comment and trust that our comments will be taken into consideration.

Yours faithfully

James

James McMurdo MRTPI MRICS

Director

For and on behalf of **McMurdo Land Planning and Development Limited**