

## **Introduction**

Bell Cornwell represents the owners of Darts Farm. Darts Farm is a national award winning, unique retail destination with its own and locally produced food at its heart but is also a destination for wellness, the home and garden and the great outdoors. Darts Farm is home to 13 different businesses with 400 people employed on-site and it supports 500 suppliers, most of whom are located in Devon and across the West Country. With close to a million visits a year, it therefore makes a major contribution to the economy of the area.

As an important local stakeholder, Darts Farm has a considerable interest in the future direction of development in East Devon and therefore in the approach proposed in the draft East Devon Local Plan. They have therefore reviewed the draft policies set out within the document and notably *Strategic Policy WS15: Employment Land at Darts Farm* and *Policy SE02: Employment development in the countryside*. Our client has a number of observations on these policies and these are set out below.

## **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. The amount of affordable housing to be sought is to vary according to the location. For most sites within the 'West End' area, the policy seeks 35% affordable housing. Elsewhere, the amount sought will be lower and will vary between 30% and 25%.

## **Response**

Darts Farm OBJECT to Policy HN02 and consider that it is unsound. In formulating the policy, the Council have relied on the evidence provided by the *East Devon Local Housing Need Assessment* (LHNA) (2022). Much of the analysis used in the LHNA is based on data which is now quite old, being largely from 2020 or 2021. It is therefore unlikely to take account of the substantial changes which 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 (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. The cost of undertaking housing development is unquestionably higher than it was when the information used to inform the LHNA was being drawn up.

DARTS FARM LIMITED  
RESPONSE TO THE EAST DEVON LOCAL PLAN 2020 – 2042 (REGULATION 19 PUBLICATION  
DRAFT) CONSULTATION (MARCH 2025) BY BELL CORNWELL LLP

Our client recognises the wider social imperative of delivering affordable housing and that this is an issue of particular importance in East Devon. However, it is important to ensure that housing development is viable and able to come forward as this will also ensure the delivery of the affordable housing which will be provided as part of such development. Given ongoing viability issues, we would suggest that requiring 35% for development within the West End part of the district is not justified. A lower level is likely to be more appropriate in order that housing can come forward in a viable manner. We would suggest that the West End affordable housing requirement be brought into line with the policy's approach for the other parts of East Devon i.e. set a district wide requirement that 30% affordable housing. A district wide approach will also remove any ambiguity about which policy level should be applied between different locations. The 'West End' is not a clearly defined location and this introduces an element of unhelpful ambiguity to the policy which needs to be addressed and a single, lower policy requirement would address this.

Such a change in approach is likely to be needed to make Policy HN02 more effective and justified.