

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

## **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 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 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

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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.