

## **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  
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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.