

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

**INTRODUCTION**

Waddeton Park Ltd is a very well-established and successful local housing land promoter and investor with considerable interest across the district. Waddeton Park Ltd has helped to facilitate new homes, affordable housing and other uses in the area. Specifically, Waddeton Park Ltd has interests in land at London Road, adjacent to the Cranbrook built-up area boundary, which they consider has potential for residential development. We attach a plan that shows this land (please refer to the Framework Plan produced by Clifton Emery Design)

Given the nature of their long-standing interests across the district, Waddeton Park Ltd is an important local stakeholder and is interested in 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. 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.

Waddeton Park Ltd OBJECTS to Policy HN02 and considers that it is unsound. In formulating the policy, and identifying the levels of affordable housing needed, the Council has 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 (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. The cost of undertaking housing development is unquestionably higher than it was when the information used to inform the LHNA was being drawn up.

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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.

There is a clear track record in the West End of it being very difficult and unusual for housing developments to be able to deliver 35% affordable housing, which demonstrates that this is an unattainable level to seek. A far more realistic proposition would be to seek a lower percentage. 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. that 30% affordable housing be sought for schemes in the West End. 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 and to allow developments to come forward whilst still delivering a good level of affordable housing, which is essential to increase the supply.