

INTRODUCTION

Mr Persey and his family are long standing owners of large areas of agricultural land in East Devon. Our client's interests include much of the land around the village of Plymtree and the surrounding area. The family continue to farm the land today, and also have commercial operations including Fordmore Farm Shop and other commercial space on the East Devon / Mid Devon border.

Our client therefore has a wide range of land and building interests in the district and they are actively promoting a site for housing in the village of Plymtree (Plym_03).

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 Plymtree, housing allocations will be required to deliver 30% affordable housing.

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, but that 30% requirement is currently proposed for Plymtree and is suggested to "provide additional viability headroom to meet additional costs."

A precautionary approach to viability is important and important to give developers flexibility and room to manoeuvre in an uncertain market – a variety of issues 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.

MR J PERSEY

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

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.