

Accession	Rep No.
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# Beer Neighbourhood Plan – Submission Version Representation Form



The Beer Neighbourhood Plan has been prepared by Beer Parish Council. It has now been formally submitted to East Devon District Council who are legally required to undertake public consultation.

**Please return this form to East Devon District Council by Friday 4 May 2018.  
Representations received after this time will not be accepted.**

## Part A – Personal Details

Please note we cannot accept anonymous responses.

Personal Details		Agent's Details (if applicable)*	
Title		Title	Mrs
First Name		First Name	Amy
Last Name		Last Name	Roberts
Job Title (where relevant)		Job Title (where relevant)	
Organisation (where relevant)	Clinton Devon Estates	Organisation (where relevant)	Bell Cornwell LLP
Address		Address	Sowton Business Centre Unit 2, Capital Court Bittern Road Exeter
Postcode		Postcode	EX2 7FW
Tel. No.		Tel. No.	██████████
Email Address		Email Address	██████████

\*If an agent is appointed, please fill in your title, name and organisation and the full contact details of the agent. Where an agent is used the agent will be the point of contact for correspondence.

<b>Name/Organisation</b> Please complete for each sheet	Clinton Devon Estates
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Please indicate whether you wish to be notified of any of the following:

- ✓ The publication of the recommendations of any person appointed to carry out an independent examination of the Beer Neighbourhood Plan.
- ✓ The adoption of the Beer Neighbourhood Plan.

## Representation details

Please use a separate form for each representation

1. To which section of the Neighbourhood Plan does this representation relate?

**(Please note that a separate form must be completed for each representation)**

<b>Policy Number</b> (Include policy, paragraph or other reference no. if appropriate)	Policy H3 – Site Allocation: Land at Short Furlong
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2. Please use the box below to set out why you are supporting or objecting to this part of the plan. If your comment relates to a specific area of land or site if possible please identify it on a map. Continue on a separate sheet if necessary

Please refer to attached covering letter.
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Name/Organisation Please complete for each sheet	Clinton Devon Estates
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**3. What changes would you suggest should be made to the plan?**

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary. Please be as precise as possible.

Please refer to attached covering letter.

Continue on a separate sheet if necessary

**4. If your representation is seeking a change, do you consider it necessary to speak at the examination?**

Please note this will not be regarded as a binding decision but will help us in our planning.

If you select No your representation(s) will still be fully considered by the independent Planning Inspector by way of written representations.

I wish to speak at the examination: Yes

Name/Organisation Please complete for each sheet	Clinton Devon Estates
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**5. If you wish to speak at the examination, please outline why you consider this to be necessary:**

Clinton Devon Estates owns a substantial amount of land in and around Beer and has been in dialogue with representatives of the Parish Council and Neighbourhood Plan Team for a number of years regarding the delivery of housing and much needed affordable housing on the preferred site for housing (land at Short Furlong). Given that the proposal to allocate land at Short Furlong is the most significant part of the Neighbourhood Plan, we wish to attend the examination in order to represent Clinton Devon Estates in any debates on this subject and to be on hand to answer any questions raised.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the Inspector does not consider it necessary to hold a public examination consideration will be given by way of written representations.*

*Please note that your comments and your contact details will be publically available, although your signature, private e-mail address and telephone number will not be visible on our web site.*

Signed	Amy Roberts For Bell Cornwell LLP
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A signature is required by the Planning Inspectorate. If filling in the form electronically it can be an 'electronic signature' by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the Inspector.

Date	26 <sup>th</sup> April 2018
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**Please e-mail the completed form(s) and any additional information to [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk) or send to Phil Twamley, Planning Policy Section, East Devon District Council, The Knowle, Sidmouth, EX10 8HL**



**bell cornwell**  
CHARTERED TOWN PLANNERS

bell-cornwell.co.uk

Phil Twamley  
Planning Policy  
East Devon District Council  
Knowle  
Station Road  
Sidmouth  
EX10 8HL

Our ref: 7099

**26 April 2018**

Dear Sir

**Beer Neighbourhood Plan Submission Version Consultation – Regulation 16 of the Neighbourhood Planning (General) Regulations 2012**

Please find enclosed representations on behalf of Clinton Devon Estates in response to the draft Beer Neighbourhood Plan (Submission Version).

Alongside this letter, the submission comprises:

- Beer Neighbourhood Plan – Submission Version Representation Form;
- Copy of Regulation 14 representations submitted to Beer Parish Council on 30<sup>th</sup> November 2017;
- Copy of Viability Appraisal Update Note, produced by Herridge Property Consultants, dated 27<sup>th</sup> November 2017.

By way of preamble, Clinton Devon Estates owns a substantial amount of land in and around Beer. Following on-going detailed discussions with the Parish Council, Clinton Devon Estates put forward in November 2014 an outline planning application for up to 30 dwellings (including 43.3% affordable housing) on land at Short Furlong (ref. 14/2621/MOUT). The application was strongly supported by the Parish Council but was ultimately refused by East Devon District Council – not for any technical reasons, but it was felt that a Neighbourhood Plan allocation was required first.



Despite the passing of time, Clinton Devon Estates remains extremely keen to progress the development of this site and continue to work with the Parish Council to deliver the maximum amount of affordable housing that the development of this land can bear.

### **Aims 9 & 10 (Page 48)**

Clinton Devon Estates continues to **support** the Draft Neighbourhood Plan's aim to:

- Increase accessibility to and affordability of housing for local people.
- Support a supply of smaller dwellings to meet local needs.

There is a clear, on-going need for affordable dwellings in the parish of Beer, and making such housing available to local people is identified as one of the most important factors in maintaining the viability of a community.

Proposals that can achieve these aims (such as development of up to 31 dwellings on land at Short Furlong – Draft Policy H3) must be supported by the Neighbourhood Plan, especially as it is recognised that development in Beer is challenging and that there are few opportunities in Beer for development within the built-up area boundary (BUAB).

### **Objectives 9.1 – 9.5 (Page 48)**

Clinton Devon Estates continues to **support** the Housing objectives of the Draft Neighbourhood Plan, especially objectives 9.1 – 9.4:

- 9.1: Support development where it demonstrates it is fulfilling an identifiable local housing need.
- 9.2: Ensure provision of an appropriate mix of dwelling sizes, tenures and external space.
- 9.3: Ensure that new dwellings are designed to be compatible with their immediate surroundings.
- 9.4: Support the development of affordable rental and shared equity/ownership housing.

Objective 9.5, which seeks to ensure that all housing developments provide at least the maximum amount of affordable housing required by local plan policies, must acknowledge that, in certain circumstances, viability could reduce the percentage of affordable housing that schemes are able to deliver. Indeed, the supporting text on page 54, paragraph 4 of draft Neighbourhood Plan (Submission Version) states that:



*“The possibility of the viability argument reducing the percentage of affordable houses below the policy target is acknowledged. A figure less than the Local Plan target percentage may be acceptable as we consider that any open market housing development, which enables delivery of some affordable housing is better than no development and no affordable houses.”*

### **Policy H3 – Site Allocation: Land at Short Furlong**

Clinton Devon Estates **supports** the site allocation: Land at Short Furlong for up to 31 dwellings. Clinton Devon Estates remains committed to bringing housing development forward on this land and on the same terms as set out in their previous application, which would deliver a substantial amount of affordable housing.

A key aspiration of the Neighbourhood Plan is to bring forward affordable housing and there is a clear acceptance from both the Parish Council and the landowner that allocating Short Furlong for housing will deliver this objective. The Short Furlong development would meet the Parish’s key housing aims of:

- *Increasing accessibility and affordability to housing for local people* – it has been evidenced that a scheme of 30 dwellings could provide 13 affordable homes for local people.
- *Supporting a supply of smaller dwellings to meet local needs* – the development could include a mix of unit sizes.

Development of the land at Short Furlong would also meet the Neighbourhood Plan’s relevant housing objectives, by:

- Helping to fulfill an identifiable local housing need.
- Providing an appropriate mix of dwelling sizes, tenures and external space.
- Providing dwellings that are compatible with their immediate surroundings.
- Providing affordable rental and shared equity/ownership housing.

Clinton Devon Estates has real concerns, however, regarding the wording of the affordable housing requirement in Draft Policy H3, which seeks to require a minimum amount of affordable housing to be provided on-site in accordance with Neighbourhood Plan Policy H1. Policy H1 refers to East Devon Local Plan Strategies 34 and 35 and should **not** apply to land at Short Furlong. Currently, the wording is such that Policy H1 requires that any new housing schemes in Beer (outside of the BUAB), whether they are to



be delivered via a land allocation or not, should be subject to the affordable housing levels required by the Local Plan for exceptions housing sites.

It will be appreciated that, as a specific allocation within the Neighbourhood Plan, development of the land at Short Furlong would not be subject to consideration under Strategy 35 of the Local Plan, which relates to 'exceptions' development i.e. to schemes which by their very nature have not come about through specific land allocations. Whilst the 66% requirement in Policy H1 may be reasonable in relation to other as-yet-unidentified schemes which may come forward in Beer, there is no need for the wording within Policy H1 to apply to the Short Furlong site or for it to be tied via Policy H1 to the possibility of meeting the 66% requirement as set out under that policy.

The Beer Neighbourhood Plan only needs to be in general, and therefore not absolute) conformity with the strategic policies of the East Devon Local Plan (National Planning Policy Guidance paragraph: 009 Reference ID: 41-009-20160211) and is, therefore, able to set its own policies that reflect local requirements and need evidence. As a consequence of lengthy discussions between the landowner and Parish Council and very detailed viability analysis, it is known that 43.3% is the maximum level of affordable housing that this site can bear. As set out above, Clinton Devon Estates submitted an outline planning application for up to 30 dwellings on land at Short Furlong in November 2014 (ref. 14/2621/MOUT). As part of that application, Clinton Devon Estate's housing advisors produced a detailed viability appraisal, which was reviewed and analysed by the District Valuation Office in April 2016. It was agreed by all parties that 66% affordable housing would render the scheme unviable. After detailed analysis, all parties agreed that a figure of 43.3% affordable housing was achievable and acceptable and could be applied to the scheme. As recognised in the supporting text to the draft Neighbourhood Plan Policies, carrying out development in Beer is challenging with construction costs above average because of the area's topography and the AONB designation, which imposes stringent environmental and design conditions.

Due to the passing of time since the viability assessment was undertaken, Clinton Devon Estates has secured an update of the position (please refer to the letter dated 27<sup>th</sup> November 2017 produced by Herridge Consulting Ltd, enclosed). As will be noted, this confirms that a scheme proposing (as before) 13 affordable houses (i.e. 43.3% of the total) remains viable but that this remains the maximum which a viable development of the site is capable of bearing.

The landowner has agreed that a provision of 43.3% will be provided on site and continues to commit to this. Therefore, Policy H3 needs to be very clear that on this point. Any policy requirement that would



flow from the wording of the Neighbourhood Plan as currently drafted could inadvertently require higher levels of provision and prevent a scheme with an entirely suitable level of affordable housing from being approved and frustrating the entire policy, as nothing would be delivered. Policy H3 must recognise that 43.3% affordable housing will come forward on this site and the Neighbourhood Plan needs to allow this to happen, in a way that it currently does not. This is especially important as it is explicitly recognised (page 54, paragraph 3) that there are few opportunities in Beer for development within the current BUAB other than one or two units infill plots, which offer fewer than the six-dwelling threshold at which affordable housing contributions are required. The scheme at Short Furling, therefore, represents the main opportunity by which the community can secure new affordable housing.

Whilst we note that the draft wording of Policies H1 and H3 do allow for some flexibility in terms of affordable housing provision for viability reasons, there is already enough robust and tested viability evidence available to inform the independent examiner of the level of affordable housing that is achievable on this site (for a development of 30 dwellings) and to justify a specific, lower level of affordable housing to be set for the Short Furlong site within Policy H3.

As a result of the on-going dialogue with representatives of the Parish Council and Neighbourhood Plan Team, which dates back to September 2013, we note that expectations for affordable housing provision on this site have not changed and that parish councillor representatives believe that Policies H1 and H3 afford enough flexibility for a future planning application for a 30 dwelling scheme proposing 43.3% affordable housing on land at Short Furlong to gain neighbourhood plan support (as this level is within the range of 40-66% that can be supported).

We also note from page 54, paragraph 5 that the Parish Council proposes to extend Beer's BUAB to include the land at Short Furlong so that a 40-50% affordable housing requirement would apply in line with Strategy 34 of East Devon's Local Plan, demonstrating an on-going consensus that a figure of 43.3% affordable housing is acceptable here. Clinton Devon Estates supports this proposal to extend the BUAB - land at Short Furlong should indeed be included, as it is crucial for the delivery of affordable housing.

Notwithstanding this, there is enough evidence available now to show that 66% affordable housing is not achievable on this site (the Parish Council's preferred site for housing) but 43.3% is. To avoid any ambiguity or potential resistance from parties that would be responsible for determining any subsequent planning application, Policy H3 should be revised to accept what has been agreed by the District Valuer and set out a policy requirement for 43.3% affordable housing. Paragraph 1 must be reworded to state that "**Land at**



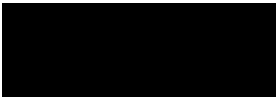
***Short Furlong identified in Figure 11 is allocated for up to 31 dwellings with 43.3% affordable housing to be provided on-site."***

The key point here is that the land at Short Furlong provides the optimum opportunity for delivering the maximum possible amount of affordable housing on a site which is very close to the centre of the community.

If you require any further information or clarification, please do not hesitate to contact Amy Roberts on the number below.

Yours faithfully

**BELL CORNWELL LLP**



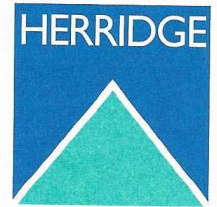
**AMY ROBERTS** BSc (Hons) MSc MRTPI

Principal Planner

DD 

Email 

Enc.



**PROPERTY**  
CONSULTING LTD

4 Barnfield Crescent  
Exeter, EX1 1QT

Tel: [REDACTED]

HERRIDGE

Mrs A Roberts  
Bell Cornwell LLP  
Sowton Business Centre  
Unit 2, Capital Court  
Bittern Road  
Exeter  
EX2 7FW

27<sup>th</sup> November 2017

Dear Amy

**Re: Land at Short Furlong, Beer**

Following our recent telephone conversation, I am pleased to enclose our updated advice in connection with the viability issues relating to the proposed redevelopment of the subject site.

As you know, we produced a viability assessment for the site on 17<sup>th</sup> February 2016, which was submitted to East Devon District Council, as part of the outline planning application reference 14/2621/MOUT for the construction of up to 30 dwellings, with all matters apart from access reserved. This application was submitted by the landowner, Clinton Devon Estates (CDE) following extensive discussions with the local Parish Council.

Our original viability assessment was sent to the District Valuer for verification and it was agreed between the parties that the proposed scheme could provide 13 units of affordable housing (43.3% of the total) comprising 9 units for affordable rent and 4 units of intermediate affordable. However the application was refused by the local authority on 11<sup>th</sup> May 2016.

We have now been asked by you on behalf of CDE to review this previous advice in light of current market conditions, to ascertain whether the conclusions remain valid. This information can then be used as part of the emerging Neighbourhood Plan process for Beer, which has identified the site as a proposed allocation for new residential development.

Having undertaken an updated market appraisal of the previous scheme for 30 dwellings, we have concluded that the potential selling price of the completed houses has increased since the original viability assessment was produced. However, it is also clear from independent indices such as BCIS that build costs have increased by a similar amount over this same period.

On that basis, we are satisfied the previous conclusions on viability, namely that a scheme of up to 30 dwellings on the subject site with 43.3% affordable housing provision is viable but that higher levels of affordable housing would not generate sufficient return to make the scheme viable to developers and therefore deliverable at the current time.

If you have any queries regarding this update advice please let me know.

Yours sincerely



Alan Sydenham BSc MRICS  
For and on behalf of  
HERRIDGE PROPERTY CONSULTING



**bell cornwell**

CHARTERED TOWN PLANNERS

01392 357515 | [info@bell-cornwell.co.uk](mailto:info@bell-cornwell.co.uk) | [bell-cornwell.co.uk](http://bell-cornwell.co.uk)

FAO: Annie Dallaway, Parish Clerk

Our ref: 7099

Via email

**30 November 2017**

Dear Madam

**Beer Neighbourhood Plan Pre-submission Consultation - Regulation 14 of the Neighbourhood Planning (General) Regulations 2012  
Comments Form for the Neighbourhood Plan**

Please find enclosed representations on behalf of Clinton Devon Estates in response to the Beer Neighbourhood Plan Pre-Submission Draft.

By way of preamble, it will be recalled that Clinton Devon Estates own a substantial amount of land in and around Beer. Following on-going detailed discussions with the Parish Council, Clinton Devon Estates put forward an outline planning application for up to 30 dwellings (including 43.3% affordable housing). At the time, the application was strongly supported by the Parish Council but was ultimately refused by East Devon District Council – not for any technical reasons, but it was felt that a Neighbourhood Plan allocation was required first.

Despite the passing of time, Clinton Devon Estates remains extremely keen to progress the development of this site and continue to work with the Parish Council to deliver the maximum amount of affordable housing that the development of this land can bear.

The submission comprises:

- Completed comments form



- Viability Appraisal Update Note, produced by Herridge Property Consultants, dated 27<sup>th</sup> November 2017.

### **Aims 9 & 10 (page 48)**

Clinton Devon Estates **supports** the Draft Neighbourhood Plan's aims to:

- Increase accessibility and affordability to housing for local people.
- Support a supply of smaller dwellings to meet local need.

There is a clear, on-going need for affordable dwellings in the parish of Beer, and making such housing available to local people is identified as one of the most important factors in maintaining the viability of a community.

Proposals that can achieve these aims (such as a development of up to 31 dwellings on land at Short Furlong – Draft Policy H3) must be supported by the Neighbourhood Plan, especially as it is recognised that development in Beer is challenging and that there are few opportunities in Beer for development within the BUAB.

### **Objectives 9.1 – 9.5 (page 48)**

Clinton Devon Estates **supports** the Housing objectives of the Draft Neighbourhood Plan, especially objectives 9.1-9.54:

- 9.1: Support development where it demonstrates it is fulfilling an identifiable local housing need.
- 9.2: Ensure provision of an appropriate mix of dwelling sizes, tenures and external space.
- 9.3: Ensure new dwellings are designed to be compatible with their immediate surroundings.
- 9.4: Support the development of affordable rental and shared equity/ownership housing.

Objective 9.5 must acknowledge that, in certain circumstances, viability could reduce the percentage of affordable housing that schemes are able to deliver. Indeed, the supporting text on page 52 of the Draft Neighbourhood Plan states that:

*“The possibility of the viability argument reducing the percentage of affordable houses below the policy target is acknowledged. A figure less than the Local Plan target percentage may be acceptable as we*



*consider that some open market housing development which enables deliver of affordable housing is better than no development and no affordable houses.”*

Neighbourhood Plan objectives and policies must provide sufficient flexibility to ensure that sensitive housing schemes, providing an acceptable level of affordable housing for local people, can be brought forward and to ensure that opportunities to deliver affordable housing (which it is recognised are limited in the parish) are not sterilised by unachievable affordable housing targets.

### **Policy H3 (page 57)**

Clinton Devon Estates **supports** the site allocation: Land at Short Furlong for up to 31 dwellings.

The development would meet the Parish’s key housing aims of:

- *Increasing accessibility and affordability to housing for local people* – it has been evidenced that a scheme of 30 dwellings could provide 13 affordable homes for local people.
- *Supporting a supply of smaller dwellings to meet local needs* – the development could include a mix of unit sizes, including one and two bed dwellings.

Development of the land at Short Furlong would also meet the Neighbourhood Plan’s relevant housing objectives, by:

- Helping to fulfill an identifiable local housing need.
- Providing an appropriate mix of dwelling sizes, tenures and external space.
- Providing dwellings that are compatible with their immediate surroundings.
- Providing affordable rental and shared equity/ownership housing.

There are real concerns, however, regarding the wording of the affordable housing requirement in Draft Policy H3 which seeks to require a minimum amount of affordable housing to be provided on-site in accordance with policy H1. Policy H1 requires:

*“Proposals outside the built-up area boundary will aim for 66%, in line with Strategy 35 of the Local Plan, accepting that this percentage may be reduced due to viability issues. Proposals which deliver less than 40% affordable housing sites of 6 houses or more will not be supported.”*



It will be appreciated that, as a specific allocation within the Neighbourhood Plan, development of the land at Short Furlong would not be subject to consideration under Strategy 35 in the Local Plan which relates to 'exceptions' development i.e. to schemes which by their very nature have not come about through specific land allocations. Whilst the 66% requirement in Policy H1 may be reasonable in relation to other as-yet-unidentified schemes which may come forward, there is no need for the wording within Policy H1 to apply to the Short Furlong site or for it to be tied via Policy H1 to the possibility of meeting the 66% requirement as set out under that policy.

Whilst we note that the draft wording of Policies H1 and H3 do allow for some flexibility in terms of affordable housing provision for viability reasons, there is already enough robust and tested viability evidence available to inform the examining Inspector of the level of affordable housing that is achievable on this site (for a development of 30 dwellings) and to justify a specific, lower level of affordable housing to be set for the Short Furlong site within Policy H3.

As the Parish Council knows, Clinton Devon Estates submitted an outline planning application for up to 30 dwellings on land at Short Furlong in November 2014 (ref. 14/2621/MOUT). This application was refused, not because of any inherent unsuitability of the land but simply because it was felt that a Neighbourhood Plan allocation was required to be in place prior to the scheme progressing. As part of that application, Clinton Devon Estate's housing advisors produced a detailed viability appraisal, which was reviewed and analysed by the District Valuation Office in April 2016. It was agreed by all parties that 66% affordable housing would render the scheme unviable. As recognised in the subtext to the draft Neighbourhood Plan Policies, development in Beer is challenging with construction costs above average because of the area's topography and the AONB designation, which imposes stringent environmental and design conditions. After detailed analysis, all parties agreed that a figure of 43% affordable housing was achievable and acceptable and could be applied to that scheme.

Due to the passing of time since the viability assessment was undertaken, Clinton Devon Estates has gone back to its advisors to secure an up-to-date appraisal of the position (please refer to the letter dated 27<sup>th</sup> November 2017 produced by Herridge Consulting Ltd, enclosed). As will be noted, this confirms that a scheme proposing (as before) 13 affordable houses (i.e. 43.3% of the total) remains viable but that this remains the maximum which a viable development of the site is capable of bearing.



As a result of on-going dialogue with representatives of your parish council and neighbourhood plan team, which dates back to September 2013, we note that expectations for affordable housing provision on this site have not changed and that parish councillor representatives believe that Policies H1 and H3 afford enough flexibility for a future planning application for a 30 dwelling scheme proposing 43% affordable housing on land at Short Furlong to gain neighbourhood plan support (as this level is within the range of 40-66% that can be supported). Notwithstanding this, we are of the firm view that as there is already enough evidence to show that 66% affordable housing is not achievable on this site (the Parish Council's preferred site for housing) but 43.3% is. To avoid any ambiguity or potential resistance from parties that would be responsible for determining any subsequent planning application, Policy H3 should be revised to accept what has been agreed by the District Valuer and set out a policy requirement for 43.3% affordable housing. Clinton Devon Estates cannot be put in the position whereby they face another refusal from East Devon District Council as a result of perceived conflict with the 66% requirement currently proposed.

Therefore, paragraph 1 of draft Policy H3 should be re-worded to state that:

*“Land at Short Furlong identified in Figure 11 is allocated for up to 31 dwellings with 43% affordable housing to be provided on-site.”*

Finally, and as a concluding point, we would highlight that one of the key objectives of the neighbourhood plan process is to provide local communities with the means to deliver on those objectives which *they* consider to be important and that neighbourhood plans give the freedom to do this without being unduly fettered by wider policy restrictions. Given the work which has been done to-date on the Short Furlong scheme and the extent of discussions between the Parish Council and Clinton Devon Estates on this, the Parish Council should not feel obliged to set the 66% affordable requirement if this is simply to reflect the Local Plan policy on exceptions housing development. As mentioned above, and as an allocation, this site would not be an exceptions scheme and so would not be subject to Strategy 35. The key point is that the land at Short Furlong provides the means for delivering the maximum possible amount of affordable housing on a site which is very close to the centre of the community. We would therefore suggest that Policy H3 does not need to reflect Strategy 35 of the Local Plan.

If you require any further information or clarification, please do not hesitate to contact Amy Roberts on the number below.



Yours faithfully  
**BELL CORNWELL LLP**



**AMY ROBERTS** BSc (Hons) MSc MRTPI  
Principal Planner

DD 

Email 

Enc.