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8

Full name: Carol Blyth

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: Sewage infrastructure must come first

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Does not mention the sewer problem

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Update the sewers before allowing extra housing

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: No mention of our sewer trouble

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Nathan Budd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: Chapter 8, "Meeting Housing Needs," is not legally compliant because it proposes levels and distributions of housing development without adequately demonstrating that the necessary infrastructure, particularly wastewater infrastructure, will be available to support that development. This contravenes the National Planning Policy Framework (NPPF), which requires local plans to ensure that development is sustainable and that infrastructure needs are addressed. The chapter outlines housing targets and allocations, but it fails to provide sufficient evidence of effective cooperation with Southwest Water or a robust plan for delivering the necessary infrastructure upgrades. This lack of assurance regarding infrastructure delivery, especially concerning wastewater, renders the chapter legally unsound. The plan must demonstrate a clear strategy to ensure that housing growth does not exacerbate existing infrastructure problems or lead to environmental harm, and Chapter 8 does not provide that assurance.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make Chapter 8 legally compliant, the following modifications are necessary:

Infrastructure Capacity Assessment: Include a requirement within the chapter for all housing development proposals to be supported by a thorough assessment of existing

and future wastewater infrastructure capacity. Suggested Revised Wording: "Before any housing development is approved, the applicant must demonstrate, through a detailed assessment, that the existing wastewater infrastructure has sufficient capacity to accommodate the development, or that necessary upgrades will be provided in a timely manner. This assessment must be undertaken in consultation with Southwest Water." Phasing Linked to Infrastructure: Implement policies that explicitly link the phasing of housing development to the delivery of necessary wastewater infrastructure improvements. Suggested Revised Wording: "Housing development will be phased to align with the provision of adequate wastewater infrastructure. Development will not be permitted to proceed at a rate that outpaces the delivery of necessary infrastructure upgrades. A phasing plan, agreed upon with Southwest Water, must be submitted and approved prior to the commencement of development." Contingency for Infrastructure Delays: Incorporate contingency measures to address potential delays or shortfalls in infrastructure delivery, ensuring that housing development can be adjusted if necessary. Suggested Revised Wording: "In the event that planned wastewater infrastructure improvements are delayed or cannot be delivered as anticipated, the Council will review housing allocations and, if necessary, implement measures to restrict or slow down the rate of housing development until the required infrastructure is in place." These modifications will make Chapter 8 legally compliant by ensuring that the plan adheres to the NPPF's requirements for sustainable development, demonstrates that housing growth is contingent on adequate infrastructure, and provides mechanisms to address potential infrastructure deficits.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Chapter 8, "Meeting Housing Needs," is not sound because it sets out housing targets and allocations without providing a sufficiently robust and detailed framework for ensuring that the necessary infrastructure, particularly wastewater infrastructure, will be delivered. The chapter relies on general statements about the need for infrastructure but lacks the specific commitments, mechanisms, and certainty required to demonstrate that infrastructure deficits will be addressed and that housing development will be sustainable. The absence of a clear "infrastructure-first" approach and the failure to adequately address the known issues with Southwest Water's capacity render this chapter unsound. The policies within Chapter 8 do not provide a credible strategy for ensuring that housing development is aligned with infrastructure capacity and will not exacerbate existing environmental problems.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To make Chapter 8 sound, the following modifications are necessary:

Detailed Infrastructure Delivery Plan: Include within the chapter a requirement for a detailed Infrastructure Delivery Plan (IDP) that specifically addresses wastewater infrastructure needs. This plan should include: A clear assessment of existing capacity. Identification of necessary upgrades. A funding strategy. A delivery timetable. Responsibilities for delivery. Suggested Revised Wording: "All policies within this chapter are underpinned by a comprehensive Infrastructure Delivery Plan (IDP) that details how necessary infrastructure, including wastewater infrastructure, will be provided to support housing development. The IDP will be developed in collaboration with Southwest Water and other relevant agencies and will be regularly reviewed and updated." Infrastructure Capacity Triggers: Establish specific, measurable triggers related to wastewater infrastructure capacity that will govern the release of housing allocations. Suggested Revised Wording: "Housing allocations will be released in phases, with each phase contingent on meeting pre-defined triggers related to wastewater infrastructure capacity. These triggers will be developed in consultation with Southwest Water and will include specific metrics, such as treatment capacity and sewer network upgrades. Regular monitoring of these triggers will inform decisions on the release of future housing allocations." Strategic Collaboration Mechanism: Create a formal mechanism for ongoing strategic collaboration with Southwest Water to ensure that housing development and wastewater infrastructure planning are integrated. Suggested Revised Wording: "The Council will establish a strategic partnership with Southwest Water to ensure ongoing collaboration on the planning and delivery of wastewater infrastructure. This partnership will involve regular meetings, joint planning exercises, and information sharing to ensure that housing development and infrastructure provision are effectively aligned." These modifications will make Chapter 8 sound by providing the necessary detail, certainty, and accountability regarding infrastructure delivery, ensuring that housing development is sustainable, and that community concerns are addressed through a robust and transparent process.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as

possible.: Chapter 8, "Meeting Housing Needs," fails to comply with the Duty to Cooperate because it does not provide sufficient evidence of effective engagement and joint working with relevant authorities and stakeholders, particularly Southwest Water, to address strategic infrastructure issues. While the chapter outlines housing targets and allocations, it lacks specific details on how the Council has cooperated with SWW to ensure that wastewater infrastructure capacity will be sufficient to support the proposed growth. The chapter's policies do not demonstrate that the Council has actively engaged with SWW to plan for and secure the necessary infrastructure improvements, which is a key requirement of the Duty to Cooperate. There is a lack of transparency and evidence of meaningful collaboration to address the known challenges related to wastewater infrastructure and its impact on housing delivery.

Full name: Richard John Eley

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: This Chapter is a vast improvement upon the extraordinary Policy 41 that appeared in the earlier draft version of the Local Plan. Policy 41 required the building of extremely high numbers of specialist accommodation for elderly people. This would have grossly distorted the housing market, and would have hugely reduced the provision of affordable homes for younger people. Policy 41 was the result of poor arithmetic, the details of which are no no longer relevant. This new version is a great improvement. Thank you for changing it so completely.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: See above.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: See above.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Dvaid Lewis

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It has to be easily read to be understood, language can be discriminatory, where does it describe the plan for social/council housing ?

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sylvia Meller

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: I do agree with the whole chapter. But, why are we still having lots of empty council flats/houses? Why are we having lots of houses which are empty throughout most of the year or are used as holiday lets? Why are we having planning applications for developments with mainly unaffordable housing? Why are we having planning applications in areas that are National landscapes? We should be looking into creating affordable 1-2 bedroom flats in apartment blocks instead of individual houses to reduce the environmental footprint as well as deliver flats which are more needed than houses.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Instead of building up even more green space we should look at other options.Why are we still having lots of empty council flats/houses? Why are we having lots of houses which are empty throughout most of the year or are used as holiday lets? Why are we having planning applications for developments with mainly unaffordable housing? Why are we having planning applications in areas that are National landscapes? Why are we only seeing planning applications for individual houses instead of apartment blocks with flats?

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Restore council flats so they can be made available. Compulsory purchase flats/houses which are empty/derelict and convert into affordable or council flats/houses. Stop 2nd home purchases. Stop developments which have less than 75% affordable houses. Stop developments on areas of National

landscapes , flood plains. Give planning permission to apartment blocks instead of individual houses.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Looking at all the local planning applications, there is not one that would provide enough affordable housing, doesn't destroy our landscape of natural beauty, our environment. If the Meeting Housing Needs wants to be cooperating with the locals, then listen to what they really want or don't want. We do not want our green areas build up , we want affordable flats not houses.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: 8

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: The issue comes if legal compliance changes which it is at the moment at a very dramatic rates

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Not sure

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is way to flimsy in its approach and it does not seem to meet the reginal and national levels of housing in any shape or form.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: There just needs to be a massive boost and push for housing in the area as a whole. The figures being talked about do not go anywhere near the national requirements

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: There just needs to be a massive boost and push for housing in the area as a

whole. The figures being talked about do not go anywhere near the national requirements and as I understand it this is a fundamental part of the national house building plan and so it must meet set requirements which I cannot see this document does

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

8.1

Full name: Bob Chapman

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

8.1

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Clearly the Council has little or no control over developers. I believe once planning permission is granted the developer MUST be given as set timescale in which to complete the development, failure to meet the timescales should carry punitive penalties. EG. look at the situation in Seaton (Pebble Beach) Bovis have taken over a decade to complete just 195 of the 222 planned homes (some small) at the rate they are going the site will never be finished. During which time the S106 monies/promised facilities have not been forthcoming.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Set completion deadlines with penalty clauses S106 obligations enforced

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

8.3

Full name: Chrissie Hunn

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

8.3

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: There needs to be local legislation that defines what affordability is. No new housing is affordable when developers are trying to make a profit. Housing needs to be built for the community needs and not the wrong type of housing such as privately owned retirement flats on brownfield sites that could of been mixed use.

8.42

Full name: Paul Andrew Beard

Organisation (where relevant): Andrew Beard Planning

Other party name (if relevant): Exeter & Honiton Gospel Hall Trust

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Paragraph

1(a). Please write down the paragraph, policy or figure number that your representation relates to.:

8.42

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Site allocation at Langaton Lane fails to meet own criteria of policy HN09

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete reference to 5 pitches at Langaton Lane - Five pitches will be provided east of M5 and south of the Exeter-Waterloo line. in 8.42

Amend HN09 A to remove 15 minutes walking time.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Full objections previously ignored, no dialogue - views need to be before Inspector

HN01

Full name: Paul Andrew Beard

Organisation (where relevant): Andrew Beard Planning

Other party name (if relevant): Exeter & Honiton Gospel Hall Trust

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The resultant site allocations for Gypsy and Travellers Showpeople accommodation should reflect the same requirements as for general housing. Previous objections to the Langaton Lane proposed site have been ignored, yet housing applications on Langaton lane refused.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Delete allocation of Gypsy site on Langaton Lane.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Council have not listened to the previous objection, there has been no dialogue and the site allocation needs to be objected to in front of the Inspector

Full name: Terry Sneller

Organisation (where relevant): Dorset Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Dorset Council are supportive of the approach being taken by East Devon to manage growth within the East Devon area. The western focus for growth seems to be the most appropriate strategy given the significant constraints and therefore lack of opportunities in the east of the East Devon area. These constraints also reduce opportunities in the western parts of Dorset. It is understood that East Devon District Council do not have an unmet housing need. The Local Plan has been prepared under the December 2023 version of the NPPF and seeks to make provision for housing to meet the needs of East Devon. The Plan proposes a stepped housing trajectory with a lower rate of provision to 2031 with the rate increasing after this date. It is understood that this stepped rate reflects the time it takes for allocated sites to start to deliver new homes especially given the size of some of the allocations in East Devon. At this point in time, Dorset Council is examining all options for meeting its housing targets as established through the standard method in national planning practice guidance, published on 12 December 2024. The supply of homes to meet the target will be tested through forthcoming consultation and therefore it is not possible to say if Dorset will have an unmet need at the point of responding to this consultation. Discussions with East Devon will continue as both plans progress towards submission.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: We support the principle of Strategic Policy HN01 and recognise the need for new developments and housing to address the Council's needs. In addition, Vistry continue to welcome the use of local market evidence and sales information as a method to determine appropriate housing need as this provides flexibility for the market to inform the types of dwellings that should be delivered on development sites.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Vistry suggest that the policy text be amended to ensure that sufficient flexibility is built into the policy with regards to the requirement for the provision of serviced plots (for self-build / EDDC Regulation 19 Consultation: Representations | Land at Addlepool Farm custom build) and the requirement for all new development. Vistry continue to question if this request is justified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It should be acknowledged that in cases where there is no demand for self-build plots, the developer should not be penalised for not delivering specialised dwellings on new development and should be driven by demand.

To ensure that Strategic Policy HN01 is justified in accordance with the NPPF, the policy text should therefore state that “D. Serviced plots of land for self-build and custom housebuilding will be sought on new developments where there is an evidenced market demand”.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

2.81 We support the principle of Strategic Policy HN01 and the need for new developments and housing to meet existing needs. We also welcome the recognition that up-to-date local housing need evidence assessments can be referenced when assessing existing and future housing need.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To this end, we consider that the Plan should include housing allocations that deliver 100% of the housing needs of East Devon, rather than only 80%. As drafted the Plan falls approximately 238 homes per annum short of meeting the community's housing needs.

2.82 It also should be recognised that local market evidence and sales information, which should be considered within the wider remit of local housing need evidence, can be used as a method to determine appropriate housing need, and can often provide useful local intelligence beyond that set out in District wide evidence.

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing (SCB) raises concerns.

General aims: E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this.

Housing mix: D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change: General aim criteria E – No specific changes requested

Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing raises concerns.

General aims:

E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up to date needs evidence and a blanket approach does not align with this.

Housing mix:

D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of

the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change:

General aim criteria E – No specific changes requested

Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing (SCB) raises concerns.

General aims:

E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this.

Housing mix:

D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change:

General aim criteria E – No specific changes requested;

Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing raises concerns. General aims: E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up to date needs evidence and a blanket approach does not align with this. Housing mix: D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change: General aim criteria E – No specific changes requested Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Obsidian Strategic Asset Management

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing (SCB) raises concerns.

General aims:

E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this.

Housing mix:

D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change:

General aim criteria E – No specific changes requested

Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): WainHomes (South West) Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing (SCB) raises concerns.

General aims:

E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this.

Housing mix:

D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change:

General aim criteria E – No specific changes requested

Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Cavanna Homes (Cavanna)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing) raises concerns. www.carneysweeney.co.uk General aims: E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this. Housing mix: D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change: General aim criteria E – No specific changes requested Housing Mix criteria D – Amend to refer to suitable sites rather than serviced plots of land.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the general aims and objectives of Strategic Policy HN01 are supported, the approach to self and custom build housing (SCB) raises concerns. General aims: E – This section refers to meeting identified local demand for self and custom build (SCB) but Policy HN05 (discussed further below) mandates a blanket requirement of 5% of plots on schemes of 20 or more to be provided as SCB plots. Any requirement for SCB plots should be based on up-to-date needs evidence and a blanket approach does not align with this. Housing mix: D. It is not considered that serviced SCB plots on larger housing developments is the most effective way to meet any identified SCB need (discussed further below).

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Required change: General aim criteria E – No specific changes requested

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

5.1 Draft Policy HN01 requires development sites to provide a balanced and mixed housing provision in line with the September 2022 East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment (September 2022), successor documents, or subsequent superseding documents, or local housing need evidence assessments.

5.2 The Landowner welcomes the flexibility afforded to the reference documents that demonstrate local housing needs, to ensure the policy remains relevant for the duration of the plan.

Full name: Jeremy Gardiner

Organisation (where relevant): Pegasus Group

Other party name (if relevant): Taylor Wimpey Strategic Land

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: This policy is supported in principle and the need for new housing developments to meet existing housing needs is acknowledged – this is a requirement for the achievement of sustainable development, as set out in paragraphs 7 and 8 of the NPPF. We also welcome the recognition that up-to-date local housing need evidence assessments can be referenced when assessing existing and future housing need. To this end, we consider that the Plan should include housing allocations that deliver 100% of the housing needs of East Devon, rather than only 80%.

Full name: Frances Lennon

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Strategic Policy HN01: Housing to address needs [OBJECT]

2.21 Policy HN01 seeks to provide an "appropriate mix" of homes across East Devon during the plan period. Whilst this aspiration is supported overall, as drafted the policy is not clear and will not be effective, as the way in which the mix for developments will be prescribed, assessed or controlled is not clear.

2.22 If it is intended that the provisions of the mix suggested by Parts A-E will be derived via other policies of the plan (including where relevant site allocations) then this should be clearly stated, with other aspects of housing mix (for the open market element of standard major housing proposals) having regard to available evidence of need, but fundamentally information available to developers in respect of local housing demand and supply, where those delivering housing are best able to assess the types of housing that are appropriate at different sites and different stages of phased developments.

2.23 As drafted Policy HN01 is not clear, nor justified and should be modified to ensure that it is effective.

Full name: Andrew Ross

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Strategic Policy HN01: Housing to address needs [OBJECT]

2.19 Policy HN01 seeks to provide an "appropriate mix" of homes across East Devon during the plan period. Whilst this aspiration is supported overall, as drafted the policy is not clear and will not be effective, as the way in which the mix for developments will be prescribed, assessed or controlled is not clear.

2.20 If it is intended that the provisions of the mix suggested by Parts A-E will be derived via other policies of the plan (including where relevant site allocations) then this should be clearly stated, with other aspects of housing mix (for the open market element of standard major housing proposals) having regard to available evidence of need, but fundamentally information available to developers in respect of local housing demand and supply, where those delivering housing are best able to assess the types of housing that are appropriate at different sites and different stages of phased developments.

2.21 As drafted Policy HN01 is not clear, nor justified and should be modified to ensure that it is effective.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on issues raised and respond as appropriate during hearings.

Full name: Mike Allen

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Housing for all stages of life (Policies HN01, HN03 and Policy HN04 The EDDC draft Local Plan (LP) and the NPPF focus on the diverse needs for housing in the population. The draft Local Plan recommendation is that developers focus on homes with 3-4 bedrooms. I believe this to be an inadequate, simplistic, policy target. Our Local Plan (LP) and our Corporate Plan must serve the diverse needs of the local population and must be the basis of our decisions about Housing and Economic Development. All NPPF revisions since 2018 have laid greater stress on the need for different types of homes for different types of people and a need to take account of demographic trends Policy HN01 (Meeting housing needs) summarises a list of needs, which I fully support, but then only focuses on tenure and percentages for affordable homes. However the Age profile trend for the Plan period shows that nearly all growth in the population is in the 65+ age group. (ONS) (2023) and the LP seems to presume that sheltered housing and care homes are the only issue. They are not. Building suitable new homes and supporting the adaptation of the existing housing stock will be critical as the population ages (East Devon Local Housing Needs Assessment 2022). However there are surprisingly similar requirements among young people and retiring people around the need for small open-plan homes well equipped for broadband fibre-to-premises which will facilitate home-working and/ or telecare. These homes can be open plan 2 bedroom flats, or open plan houses and bungalows if they are accessible and equipped.

Full name: will halwyn

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: I believe that if we are to justify the loss of farmland and natural environment by any greenfield site usage, there should be safeguards that these new developments should not be purchasable as second homes or holiday lets. I do also believe that as part of housing needs policy the council should be taking these housing losses into account as they do significantly impact the area, particularly the rental sector.

Full name: Sacha Pemberthy

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: If I am right that the prioritisation of housing needs is implied in the ordering of points A - F there is a fundamental issue in Exmouth at least of provision of housing for older people being prioritised ahead of housing for young people starting out. This is inconsistent with the need that is evident in the town and simply attracts more elderly people from outside of the area rather than meeting local needs.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would reorder the priority bullet points to move C and D ahead of B. Further it would be helpful just as % has been set for affordable housing that % of housing for elderly people is defined so that we don't have a continuation of McCarthy and Stone type of profit oriented developments dominating Exmouth and preventing sites being developed for young people. Having housing that is flexible with ageing vs elderly ghettos feels more attuned to creating vibrant and healthy communities

Full name: Helen Mary Roulson

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Housing needs are huge in this area. I work in residential lettings through Stags and the need for affordable housing is huge with several families after every property. If families have pets or children it's becoming harder and i don't think the Landlords reform will do enough to help in any great detail. Homes in a road need to be mixed between apartments/bungalows for older residents, a mix of 2,3 and 4 bedroom houses for families and a collection of max 3 storey blocks of flats. 40% should be for people that live within 60 miles/1 hour travel of the target area. 30% should be for key workers within 1 hour of their work base. 20% should be for those under 35 from the local area relocating from a 1 hour radius. The remaining 10% should be for economic legal immigrants, genuine asylum seekers fleeing violence and short term apartments for the homeless to restart their homing needs (6 mths)

Full name: Anne Thompson

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: The emerging Local Plan is proposing around 284 houses in and around Seaton, despite, I believe, a housing needs assessment not being undertaken and despite Seaton's unique natural environment which needs protecting. There are currently over 75 properties on the market in Seaton from £49,000-£450,000 plus those currently under construction at Fosseway Court and Seaton Quay, with many other sites in the pipeline. It is also well known that so-called affordable housing frequently gets bought up by in-comers, so increasing the already strained doctors, dentists and much reduced hospital facilities.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I would like to see specific numbers related to what is actually required as affordable or required housing in the Seaton area, rather than what land can be grabbed and used to build on just to satisfy supposed government quotas. A development of over 70 new homes at nearby Colyton is currently being built with another large site planned. Our infrastructure is insufficient for any more new developments, in Seaton or outside.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: I believe that the key to protecting Seaton from unsustainable inappropriate development which will threaten so much of Seaton's way of life and future, is for EDDC to remove the site for 130 at Harepath Road - which for over 25 years has been allocated for mixed use

employment/recreation - from the emerging Plan altogether and return it to Green Wedge so that the town can build on all the work that has been put in during that time into developing Seaton as a destination for green tourism. Also, building these houses will bring the boundary of Seaton within a stone's throw of Colyford Village, which is an Ancient Borough of 800yrs standing, and will seriously impact on the life of the village.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Removal of this site would also ensure that any future retail/employment is based close to the town centre to support the town centre and therefore meet Strategy SE06 which says: Tier two towns (Seaton) form focal points of activity in East Devon towns and will be the preferred location for the development of new retail, leisure and other uses that attract and are used by people for commercial or community activities....."Development proposals that would result in the loss of existing local shops and services will be resisted where it would result in the significant or absolute loss of that facility to the community." Town centre shops have almost unanimously expressed their concern at the prospect of out of town shopping facilities at Harepath Road and many believe their businesses won't survive if such development were to go ahead. This is borne out by the statement that Tesco would bring shoppers to the town centre which never happened.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The proposals in the Plan are significant in respect of our Green Wedges and, if the Plan is approved, it is likely to lead to uncontrolled building which will no longer provide protection, enhancement and conservation of our unique natural environment and will threaten the town's future economy which is based on Natural Seaton. It will lead to flooding of surrounding homes and of the Wetlands; to loss of biodiversity and rare wildlife; loss of prime agricultural land; would result in coalescence of the settlements of Seaton and Colyford; and would change the character of this area from open rural to virtually continuous urbanised. As the Planning Inspector stated when this site last came forward for development, “the housing shortfall although significant is - arguably - relatively short term, whereas the erosion of separation between Colyford and Seaton would be permanent”.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

This policy is supported in principle and the need for new housing developments to meet existing housing needs is acknowledged – this is a requirement for the achievement of sustainable development, as set out in paragraphs 7 and 8 of the NPPF. We also welcome the recognition that up-to-date local housing need evidence assessments can be referenced when assessing existing and future housing need.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To this end, we consider that the Plan should include housing allocations that deliver 100% of the housing needs of East Devon, rather than only 80%.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Reference is needed here to the requirement for enhancement of the natural environment, and for building to achieve net-zero carbon.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reference is needed here to the requirement for enhancement of the natural environment, and for building to achieve net-zero carbon.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation (HBF)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or con-sistent with national policy

81. HBF have been unable to find the whole plan viability assessment for this Plan. We also can find no reference made to it within the Plan. This document is important to help understand the effective-ness justification or deliverability of this Plan. It is therefore not possible for us to comment fully on the justification and effectiveness of this plan, and its ability to deliver the range of housing indicated in this policy. For example, the viability of older persons housing, build to rent, student accommoda-tion, first time buyer housing or family housing will be different. Similarly different forms of afforda-ble housing have a different impact on viability. 82. The whole plan viability assessment is an essential part of the evidence base that tests whether the range of the policies in the plan as a whole make development unviable.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To be most useful HBF suggest viability appraisals should be used in an iterative manner to test different policy combinations. HBF suggest that the whole plan viability assessment should be produced in tandem with the different stages of plan-making and not relegated to something prepared after the Reg 19 version of the plan has already been consulted on.

83. In relation to the effectiveness and soundness of this particular policy HBF would observe that some of our members are finding it difficult to find a housing association partner for their affordable hous-ing. This is national problem, that the Government has attempted to address through the establish-ment of a 'clearing house' to help match affordable housing units with affordable housing providers. To date this is having a very minimal impact with only about 800 affordable homes listed nationally. It is therefore very important for the Plan to recognise the challenges facing the affordable housing sector and the impact this may have on delivering affordable housing of different types and tenures.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Most of this policy is fairly standard, but there should be a sub-division of A. to require the provision, within the 'affordable housing' requirement of a certain number of 'social' housing because the 80% rental level is still too high for those on low incomes. It is easy to forget that the servicing of the many businesses around the area will require low-paid staff as well as those on high pay. The result is often that those with low wages cannot afford to live near new developments and therefore have to travel from somewhere else.

Full name: Craig Hatton

Organisation (where relevant): Network Rail

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN01

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: The intent of the Policy to meet the Council's housing need is supported.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

HN02

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: More affordable housing should be required, not less than previous Local Plan policy. It seems to have been reduced from 50% in Budleigh Salterton to only 35%. Of the requirement for 20,909 homes, only 4,477 are required to be affordable, which is less than 25%.

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We have some overall viability concerns regarding the cumulative burdens being put on developments (BNG, Future Homes Standard, Building Safety Levy, CIL, section 106 requirements etc). It is likely that viability assessments will become more routine rather than an exception. At the very least, the policy should allow for discount market housing where a Registered Provider is not available. The discount can be set appropriately but, to support delivery, discount market should be routinely available as part of the mix and there should be a swift reversion to discount market if an RP is not available. Otherwise developments will not proceed or will stall because there is not enough certainty.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Ensure that discount market housing is available as an option particularly where there is a Registered Provider availability failure

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please see attached representations.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To be able to address queries regarding the deliverability of this policy.

Full name: Iestyn John

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Darts Farm Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: See attached representation.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See attached representation.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Amy Roberts

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Waddeton Park Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please refer to the attached sheet.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please refer to the attached sheet.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To emphasise viability concerns relating to the levels of affordable housing proposed.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr B Penny

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: MR B PENNY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 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 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 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.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Acorn Property Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 INTRODUCTION Acorn Property Group is a very well-established, locally based housing developer and land promoter with interests across the district. Acorn Property Group has helped to facilitate new homes, affordable housing and other uses in the area. They are an independent development and regeneration specialist that has, successfully created a range of residential-led refurbishment and new build schemes. Specifically, Acorn Property Group has interests in land at Hillhead, Colyton, which is an allocated site in the Emerging Local Plan which is suitable for residential development. We attach a plan that shows this land (please refer to the Appendix A document) submitted. Given the nature of their long-standing delivery of housing in the district, Acorn Property Group is an important local stakeholder within interests 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 in designated rural areas and 10 or more in non-designated rural areas. The amount of affordable housing to be sought is to vary according to location. For most allocated sites, including the land which is of interest to our client at Hillhead, Colyton, the policy seeks 30% affordable housing. Subject to further testing, Acorn Property Group could support the approach in Policy HN02 which would require this level of provision. However, 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% affordable requirement for allocations outside the West End and ACORN PROPERTY GROUP REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 Budleigh Salterton-Sidmouth/Sidford (such as Colyton) provides 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. However, in order to achieve the level of affordable housing 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.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Mr J Persey

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: MR J PERSEY REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 1 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 2 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.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Combe Estates

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: On behalf of Combe Estate

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 COMBE ESTATE REPRESENTATIONS ON THE EAST DEVON LOCAL PLAN (2020 – 2042) REGULATION 19 CONSULTATION DRAFT (MARCH 2025) BY BELL CORNWELL LLP 2 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.

Full name: Daniel Rogers

Organisation (where relevant): Bell Cornwell LLP

Other party name (if relevant): Various - see pdf attachments

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: See attachment

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: See attachment - we would suggest that that viability needs to be looked at carefully, and AH should be at the lower end of thresholds - the viability work is incomplete, and does not test this issue sufficiently.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: further viability testing needs to be undertaken with more detailed infrastructure plan.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Alistair Macdonald

Organisation (where relevant): Blue Fox Planning Ltd

Other party name (if relevant): Persimmon Homes South West

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Whilst Persimmon fully supports the provision of an appropriate level of affordable housing as an important and integral part of new development, any such requirement must be supported and justified by a robust evidence base.

As currently drafted, policy HN02 sets the affordable housing requirement at different levels for different parts of the District. For example, 35% affordable housing is required at the West End, Sidmouth and Budleigh Salterton whilst 30% is required on all other local plan allocated sites. Further, 25% is required at Axminster whilst the level of provision at the second new community has yet to be defined.

Whilst the references to viability are welcomed, neither the Policy nor its justification explain why the level of affordable housing requires varies so greatly across the District.

Paragraph 8.4 of the Regulation 19 Plan does, however, state that "The policy is supported by local evidence from the East Devon Local Housing Needs Assessment...", however, any such explanation should be clearly set out in the Plan itself rather than abdicated to a separate document.

In any event, we do not consider that the Local Housing Needs Assessment (LHNA) does provide such a justification. Further the LHNA was published in September 2022 and therefore pre-dates the current National Planning Policy Framework.

Likewise, the "key supporting document" East Devon Housing Need, Supply and Requirement Interim Topic Paper (KSD-017), dated November 2022, appears to rely on the LHNA and does not explain how the affordable housing requirements were arrived at. Instead, paragraph 8.44 of KSD-017 states:

"...the current delivery forecast of 3,551 is based on a working assumption of 35% affordable housing being delivered on future qualifying sites that meet the policy criteria, with a lower 15% rate at the second new town. The overall plan viability assessment will test those assumptions, and a range of other percentages of housing to be delivered as affordable housing. The Council will review this policy requirement when relevant evidence is available, and update this section in the next version of the topic paper."

Persimmon would make the following comments on this statement:

1. The Local Plan Viability Assessment (CSD-004) tests the viability of the various affordable housing requirements across the district but does not explain or justify how the requirements were set;

2. The Viability Assessment does not attempt to investigate any site specific matters which may impact on the viability of the affordable housing requirement being met;

3. The Statement that the Council will update the position relating to affordable housing "when relevant evidence is available" appears to be a tacit acceptance that the policy is not currently supported by a robust evidence base; and

4. The Topic Paper does not appear to have been updated to support the Regulation 19 Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Consistent with the comments set out above, the Plan should include a detailed analysis of the affordable housing requirement and justification of the approach taken including taking into account site specific factors that may affect whether he requirement can be viably met.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Persimmon is a national house builder and has vast experience in delivering new homes across the country.

Persimmon also owns the Land south west of Woolbrook (Sidm_01) allocation which is intended to deliver the majority of new homes identified for the Town and it is therefore considered that Persimmon's participation at the Hearing Sessions would be useful for the appointed Inspector(s).

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Vistry support Strategic Policy HN02 and the approach made to affordable housing with regards to allocated sites and windfall development. It is acknowledged that this requirement will assist the Council in meeting and addressing housing need and worsening affordability gap.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: In accordance with Strategic Policy Addlepool Village is proposed to deliver 35% affordable housing which will assist the Council in meeting their affordable housing need (which is understood to be one of the highest detailed within the proposed affordable housing requirements within Policy HN02).

The policy provides a breakdown of affordable housing tenures and mix, which provides no flexibility for the development industry and fails to recognise market variance. At present, the policy therefore does not accord with paragraph 86(d) of the NPPF (2023) which requires planning policies to be "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.". We therefore raise concerns in respect of the proposed affordable housing mix within Policy HN02, and request that additional flexibility be provided as it should be recognised that local market information should be used to inform the appropriate tenure breakdown, beyond that set out within the District wide housing needs assessment. The proposed affordable housing mix should therefore be considered on a case-by-case basis and allow alternative mixes where necessary.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have

identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To be considered effective and sound, Strategic Policy HN02 should provide greater flexibility and allow developers to depart from the affordable mix set out within the tables where this is robustly evidenced. Departure from the proposed affordable housing mix should be considered acceptable when sufficient market evidence is provided, particularly if the overall percentage of proposed affordable housing meets the requirements as set out within Policy HN02. Vistry suggest that the prescribed tenure mix should therefore be used as a guidance and starting point only.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

2.83 This policy prescribes the affordable housing requirements required on all developments across East Devon. For site allocations within Honiton, affordable housing is set at 30%. We agree with this approach.

2.84 The policy also prescribes the breakdown of affordable housing mix, delivering 65% Social Rent and 35% Intermediate or other forms of affordable housing, we object to this inclusion, which is inflexible and does not allow for market variance. An affordable housing mix should be prepared on a site-by-site basis and allow for changes in affordable housing need which may warrant an alternative tenure mix.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

2.85 The policy text indicates that a departure from the affordable housing tenure mix prescribed in the policy can be proposed, but that this would need to be supported by viability evidence. We object to this approach. Market evidence should be considered sufficient to allow for a departure from the tenure mix, particularly when the overall quantum of affordable housing provision meets the requirements of this policy. This must be recognised within the policy text and additional flexibility should be provided to ensure this policy is effective and meets the test of soundness.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: The proposed targets for affordable housing with Policy HN02 are supported by PHSW. For sites falling within the settlement boundary within Axminster, affordable housing is set for 25%. We agree with this approach and can confirm that land at east Axminster is policy compliant with the ability to provide 25% affordable housing.

It is noted the policy provides a proposed tenure mix of 65% social rent and 35% intermediate or other forms of affordable housing. Whilst the principle of the tenure mix is supported, PHSW suggest that sufficient flexibility should be included for all forms of development to ensure that affordable housing accords with the definition within Annex 2 of the NPPF. It is acknowledged that flexibility has been provided with regards to tenure mix for sites in Axminster, which is welcomed.

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is noted that the Three Dragons Viability Assessment that supports those assumptions does not take into account costs associated with the Building Safety Levy. Those additional costs, which for East Devon are £34.06/sqm, equating to an average of £3406 per 100sqm market dwelling are likely to have significant implications for scheme viability, which must be factored into the evidence base of the local plan for it to be sound.

Regarding the identified tenure split, social rent as opposed to affordable rent does have significant viability implications. While it is noted that explicit reference is made to the tenure split for Axminster being flexible through the consideration of viability, this flexibility needs to apply to all sites.

Viability supporting a lower percentage or different tenure mix is referred to further down in the policy but this explicit reference to Axminster in the main part of the policy risks causing confusion.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please

be as precise as possible.: Update Viability Assessment work to take into account implications of costs associated with Building Safety Levy and revise affordable housing requirements as required accordingly.

Affordable table – tenure mix column – final paragraph (amended text underlined):

At all sites, and in particular at Axminster there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to vary tenure percentages.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

The identified affordable percentages are supported.

Regarding the identified tenure split, social rent as opposed to affordable rent does have significant viability implications. While explicit reference is made to the tenure split for Axminster being flexible through the consideration of viability, this flexibility needs to apply to all sites.

Viability supporting a lower percentage or different tenure mix is referred to further down in the policy but this explicit reference to Axminster in the main part of the policy risks causing confusion.

There is also an inconsistency regarding the policy and C2 housing. In the introductory paragraph it states the policy specifically applies to C2 uses but lower down it states that C2 uses are exempt – this needs to be clarified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put

forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Text to be clarified regarding C2

Affordable table – tenure mix column – final paragraph (amended text underlined):

AT ALL SITES there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to vary tenure percentages.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The identified affordable percentages are generally considered reasonable (subject to a full update to the Viability Assessment to take account of the Building Levy) .

Regarding the identified tenure split, social rent as opposed to affordable rent does have significant viability implications. While explicit reference is made to the tenure split for Axminster being flexible through the consideration of viability, this flexibility needs to apply to all sites.

Viability supporting a lower percentage or different tenure mix is referred to further down in the policy but this explicit reference to Axminster in the main part of the policy risks causing confusion.

There is also an inconsistency regarding the policy and C2 housing. In the introductory paragraph it states the policy specifically applies to C2 uses but lower down it states that C2 uses are exempt – this needs to be clarified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Text to be clarified regarding C2

Affordable table – tenure mix column – final paragraph:

At all sites, and in particular at Axminster there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to vary tenure percentages.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Elsewhere in the Draft Local Plan, notably in Strategic Policy HN02 (Affordable Housing), it is referenced that 35% affordable housing would be a target for windfall development outside settlement boundaries. This appears at odds with Policy SP06 which restricts development outside settlement boundaries, presenting concerns about the level of contribution that windfall sites will provide to meeting housing need. Paragraph 75 of the Framework is clear that there should be "compelling evidence" that windfall sites will provide a reliable source of supply. The current wording of Policy SP06 does not provide confidence that development on windfall sites will be a reliable source of supply.

In combination, the restrictive nature of Policy SP06, and the reliance of larger sites to deliver the required housing need later in the plan-period cemented by Policy SP02, presents the prospect of a deteriorating housing supply position from the point of adoption within the first half of the plan period. The Framework is clear that planning policies "should identify opportunities for villages to grow and thrive, especially where this will support local services". The restrictive nature of Policies SP02 and SP06 is at odds with the clear intention of what the Framework is aspiring to achieve. Furthermore, the Framework is clear that strategic policies should provide for objectively assessed needs "as a minimum".

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The identified affordable percentages are supported. Regarding the identified tenure split, social rent as opposed to affordable rent does have significant viability implications. While explicit reference is made to the tenure split for Axminster being flexible through the consideration of viability, this flexibility needs to apply to all sites. Viability supporting a lower percentage or different tenure mix is referred to further down in the policy but this explicit reference to Axminster in the main part of the policy risks causing confusion. There is also an inconsistency regarding the policy and C2 housing. In the introductory paragraph it states the policy specifically applies to C2 uses but lower down it states that C2 uses are exempt – this needs to be clarified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Text to be clarified regarding C2 Affordable table – tenure mix column – final paragraph (amended text underlined):

At all sites there will be flexibility, through consideration of viability assessments and where schemes are non-viable, to vary tenure percentages.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): DAAB Partnership

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Elsewhere in the Draft Local Plan, notably in Strategic Policy HN02 (Affordable Housing), it is referenced that 35% affordable housing would be a target for windfall development outside settlement boundaries. This appears at odds with Policy SP06 which restricts development outside settlement boundaries, presenting concerns about the level of contribution that windfall sites will provide to meeting housing need. Paragraph 75 of the Framework is clear that there should be “compelling evidence” that windfall sites will provide a reliable source of supply.

Full name: Ollie Thorogood

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Jackson-Stops

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Elsewhere in the Draft Local Plan, notably in Strategic Policy HN02 (Affordable Housing), it is referenced that 35% affordable housing would be a target for windfall development outside settlement boundaries. This appears at odds with Policy SP06 which restricts development outside settlement boundaries, presenting concerns about the level of contribution that windfall sites will provide to meeting housing need. Paragraph 72 of the Framework is clear that there should be "compelling evidence" that windfall sites will provide a reliable source of supply. The current wording of Policy SP06 does not provide confidence that development on windfall sites will be a reliable source of supply.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Revisit wording of Strategic Policy HN02 in regards to windfall development outside settlement boundaries relating to SP06

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. 30% affordable housing is sought from this policy on allocated sites outside of the West End and Axminster. The evidence for this appears to be the Three Dragons Viability Assessment of January 2025. However, we note that the Three Dragons report advises, "The Council has indicated that it plans to undertake a review of the CIL rates after the Local Plan process, and this will provide the opportunity for lower CIL rates to be set for the strategic site in this plan if required". We consider that this should be specified in the Plan. The NPPF's requirement for development viability to now be addressed at the plan-making stage means that it is vital that the Council's evidence under-pinning the Plan is comprehensive and robust. The Council well need to be satisfied that its evidence has considered and assessed a comprehensive range of development and site types and sizes and in different locations in order that the policy measures that arise from it take into account the full suite of different scenarios that might apply. It is unclear at this stage to what extent the preparation of the Three Dragons report involved engagement with a broad range of interests from within the development industry. It is important that an appropriate balance is struck between seeking to meet the delivery of affordable housing, infrastructure requirements and sustainability/design objectives. Development has to be deliverable and policy requirements therefore need to be realistic in terms of what can be achieved. We are not yet convinced that the evidence underpinning this policy is sufficiently robust.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. 30% affordable housing is sought from this policy on allocated sites outside of the West End and Axminster. The evidence for this appears to be the Three Dragons Viability Assessment of January 2025. However, we note that the Three Dragons report advises, “The Council has indicated that it plans to undertake a review of the CIL rates after the Local Plan process, and this will provide the opportunity for lower CIL rates to be set for the strategic site in this plan if required”. We consider that this should be specified in the Plan. The NPPF’s requirement for development viability to now be addressed at the plan-making stage means that it is vital that the Council’s evidence under-pinning the Plan is comprehensive and robust. The Council well need to be satisfied that its evidence has considered and assessed a comprehensive range of development and site types and sizes and in different locations in order that the policy measures that arise from it take into account the full suite of different scenarios that might apply. It is unclear at this stage to what extent the preparation of the Three Dragons report involved engagement with a broad range of interests from within the development industry. It is important that an appropriate balance is struck between seeking to meet the delivery of affordable housing, infrastructure requirements and sustainability/design objectives. Development has to be deliverable and policy requirements therefore need to be realistic in terms of what can be achieved. We are not yet convinced that the evidence underpinning this policy is sufficiently robust.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. 30% affordable housing is sought from this policy on allocated sites outside of the West End and Axminster. The evidence for this appears to be the Three Dragons Viability Assessment of January 2025. However, we note that the Three Dragons report advises, "The Council has indicated that it plans to undertake a review of the CIL rates after the Local Plan process, and this will provide the opportunity for lower CIL rates to be set for the strategic site in this plan if required". We consider that this should be specified in the Plan. The NPPF's requirement for development viability to now be addressed at the plan-making stage means that it is vital that the Council's evidence under-pinning the Plan is comprehensive and robust. The Council well need to be satisfied that its evidence has considered and assessed a comprehensive range of development and site types and sizes and in different locations in order that the policy measures that arise from it take into account the full suite of different scenarios that might apply. It is unclear at this stage to what extent the preparation of the Three Dragons report involved engagement with a broad range of interests from within the development industry. It is important that an appropriate balance is struck between seeking to meet the delivery of affordable housing, infrastructure requirements and sustainability/design objectives. Development has to be deliverable and policy requirements therefore need to be realistic in terms of what can be achieved. We are not yet convinced that the evidence underpinning this policy is sufficiently robust.

Full name: CORAL CURTIS

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): BROADCLYST LVA LLP (LVA)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Strategic Policy HN02 sets out the requirements for affordable housing. This has a requirement of 30% affordable housing for this site – Land west of Whimple Road, Broadclyst (ref. Brcl_12). We support this provision, in order to assist in delivering the much-needed affordable housing across the district, and achieve balanced and mixed communities. We can also confirm that this level of affordable housing has been planned for within the proposed masterplan and can be met or exceeded on site. As part of meeting housing needs, securing greater housing diversity and encouraging high quality design, the Council welcomes proposals for custom and self-build housing to be occupied by those persons commissioning or undertaking the construction. Policy HN05 requires at least 5% of dwellings on sites planned to accommodate 20 or more homes to be delivered as serviced custom and self-build plots. Furthermore, on sites over 100 dwellings or more, design codes should be used flexibly to encourage high quality housing design, and the agreed design code should be used to provide 'plot passports' that give a simple, succinct summary of each plot as a reference point for the purchaser. Again, we recognise that the provision of custom and self-build plots can assist in meeting the housing needs of an area. We have, therefore, identified 5% of the proposed dwellings for the site as custom and self-build plots, and we do not have an issue with the general principle of a design code. Notwithstanding, it is considered that the policy wording needs further clarity as it is currently not clear whether the 5% requirement relates to the overall housing numbers on site or just the market housing element of the scheme. We suggest that the policy is worded to make clear that this reflects 5% of market housing only. We also have concerns with the requirement for self or custom builders to

have completed their development plot within 3 years. We do not see how this can be enforced or conditioned, and in light of unforeseen market circumstances, we do not consider this to be reasonable. Given that selfbuilders are unlikely to be experienced in housebuilding, a 3-year limit is a short timeframe for completion and greater consideration should be given to the wording of this policy.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: TO RESPOND, AS REQUIRED, TO ANY QUESTIONS IN RELATION TO POLICY SD07 AND IN PARTICULAR SITE BRCL_12.

Full name: Alan Williams

Organisation (where relevant): Grass Roots Planning

Other party name (if relevant): South West Strategic Developments Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Strategic Policy HN02 sets out the requirements for affordable housing. This has a requirement of 30% affordable housing for this site – Land adjacent to Beechwood, Feniton (ref. Feni_08). We support this provision, in order to assist in delivering the much-needed affordable housing across the district, and achieve balanced and mixed communities. We can also confirm that this level of affordable housing has been planned for within the proposed Illustrative Site Plan and can be met on site.

Full name: Alex Munday

Organisation (where relevant): Kitchener Land and Planning

Other party name (if relevant): Mr Lillie and Ms Blundell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Alexander Munday of Kitchener Land and Planning (KLP) on behalf of Mr Lillie and Mrs Blundell

We are generally in support of the proposed 30% affordable housing requirement for "all other local plan allocated sites".

We consider this proportion of affordable housing more reflective of both local housing needs as well as the need to ensure new developments are viable. In this respect, we consider the emerging policy position on affordable housing as more realistic than that of the adopted Local Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We do however encourage the Council to ensure that the supporting evidence base is robust and supports the proposed affordable tenure splits.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

5.3 Draft Policy HN02 outlines affordable housing requirements against the settlement hierarchy for developments of 6 dwellings or more in designated rural areas and 10 or more in non-designated rural areas. Allocated development is subject to a 30% affordable housing provision, whereas unallocated development is to be subject to 35% affordable housing provision.

5.4 The Viability Assessment demonstrates a considered approach to viability, assessing both 30% affordable housing and 35% affordable housing with respect to allocations and typologies represented in value area 3 (VA3).

5.5 The Landowner considers that the requirement for provision of 30% affordable housing on allocated sites is justified and viable. This Policy is supported.

Full name: James McMurdo

Organisation (where relevant): McMurdo Land Planning and Development Ltd

Other party name (if relevant): Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: [McMurdo Land Planning & Development Ltd on Behalf of Stuart Partners Ltd relating to Strategic Land at the "West End" of East Devon District made in the context of significant land holdings in this area. Representation to be read in conjunction with representations made by Turley on behalf of Stuart Partners Ltd and Bloor Homes Exeter on the proposed new and an expanded Hill Barton Business Park, and by Carney Sweeney on behalf of Stuart Partners Ltd and Down, relating to land being promoted for a village for up to 2,000 houses between Clyst St George and Clyst St Mary]

Object

Reasons: There is a housing delivery crisis within East Devon, Exeter City and across the subregion. The western part of East Devon (along with Exeter City) is the area considered to be the economic driver for the sub region, and its growth should not be constrained for social and economic reasons.

The drastic shortfall in affordable housing should be addressed within the emerging Local Plans (added to the numbers required) for the two authorities.

The East Devon Local Plan must prioritise securing appropriate, viable levels of affordable housing within the Plan period.

Para 3.10 of the Plan cites that the affordable housing target for it is C4,000 houses; about 50% of the need of the evidenced need of C8,000 (not including the shortfall in delivery in current Exeter and East Devon Local Plan periods).

The Local Plan must maximise the delivery of affordable housing across East Devon by allocating more land for market housing in the “West End.”

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The Local Plan should state how it is going to deliver the affordable housing need of more than 8,000 houses (it has to address the current shortfall). Allocate more housing land in the “West End” of the district to enable affordable housing delivery and reflect in other strategic policies.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I support the percentages which are included in the Plan which are reasonable in my opinion. I would, however, suggest that these percentages are subject to financial viability and this flexibility should be applied to all sites and not just sites Axminster.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant.

Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach will depend on the circumstances of the scheme.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant.

Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach which will depend on the circumstances of the scheme.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy introduces a requirement for all general housing proposals over 50 dwellings to deliver 10% of units as specialist housing for older people (SHFOP) (subject to commercial viability). This aspect of the policy is challenged for a number of reasons.

Firstly, this policy conflicts with itself. Requirement B states that all older person housing will be located within 400m walking distance of local facilities and shops. However, the Manual for Streets (2007) identifies that walkable neighbourhoods are typically characterised by having a range of facilities up to about 800m walking distance (and acknowledges that walking can replace car trips of distances under 2km) (paragraph 4.4.1). Clearly, by requiring SHFOP on all sites over 50 dwellings, there will be circumstances where SHFOP will be delivered beyond the 400m distance to facilities required by the same policy. Secondly, the Council do not appear to have considered the financial impacts of this policy (and attempted to address this with the subject to commercial viability caveat). SHFOP typically has a depressed market value, which could have a material impact on the viability of site delivery when compounded with other policy requirements (like affordable housing and self-build plots), and other CIL 122 compliant contributions. Without further evidence to support the viability of this requirement, the 10% requirement should be removed as it is not justified.

Thirdly the SHFOP requirements seem excessive and unnecessary given Policy HNO4 requires 100% of dwellings to meet M4(2) standards, making them accessible and adaptable, as well as the 5% M4(3) requirements for affordable housing. We note that

M4(2) provides viability challenges in and of itself, and combining these with the SHFOP must create real concerns regarding the deliverability of housing under this Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on these and previous representations made on the Plan

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: [Submitted on behalf of Waddeton Park Limited (Honiton)]

This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant. Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach will depend on the circumstances of the scheme.

Policy HN03: Housing to meet the needs of older people

This policy introduces a requirement for all general housing proposals over 50 dwellings to deliver 10% of units as specialist housing for older people (SHFOP) (subject to commercial viability). This aspect of the policy is challenged for a number of reasons.

Firstly, this policy conflicts with itself. Requirement B states that all older person housing will be located within 400m walking distance of local facilities and shops. However, the Manual for Streets (2007) identifies that walkable neighbourhoods are typically characterised by having a range of facilities up to about 800m walking distance (and acknowledges that walking can replace car trips of distances under 2km) (paragraph 4.4.1). Clearly, by requiring SHFOP on all sites over 50 dwellings, there will be circumstances where SHFOP will be delivered beyond the 400m distance to facilities required by the same policy. Secondly, the Council do not appear to have considered the financial impacts of this policy (and attempted to address this with the subject to commercial viability caveat). SHFOP typically has a depressed market value, which could have a material impact on the viability of site delivery when compounded with other policy requirements (like affordable housing and self-build plots), and other CIL 122 compliant contributions. Without further evidence to support the viability of this requirement, the 10% requirement should be removed as it is not justified.

Thirdly the SHFOP requirements seem excessive and unnecessary given Policy HNO4 requires 100% of dwellings to meet M4(2) standards, making them accessible and adaptable, as well as the 5% M4(3) requirements for affordable housing. We note that M4(2) provides viability challenges in and of itself, and combining these with the SHFOP must create real concerns regarding the deliverability of housing under this Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Modifications to the above policies are required. For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on these and previous representations made on the Plan

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: (PCL Planning on behalf of Waddeton Park Limited (Honiton)): This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant. Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach will depend on the circumstances of the scheme.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: in order to provide greater elaboration of the detail of these representations

Full name: Will Ridalls

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Simon Stokes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy identifies the affordable housing requirements and the proposed tenure mix. The policy specifically identifies that at Axminster there will be flexibility in respect of tenure splits taking into account viability. This then implies similar flexibility will not be applied to other areas of the District, when of course the same considerations in respect of viability may be relevant. Furthermore, it is noted that the requirement is 65% social rent with no indication of further flexibility between this and affordable rent (unlike the adopted Plan). Whilst the new NPPF does strengthen requirements for social rent, it is important to note that if the Plan does benefit from the transitional arrangements it will 11 Also at: 9 Western Road, Launceston, Cornwall, PL15 7AR t: +44 (0)1566 977000 The Keep, Creech Castle, Taunton, TA1 2DX t: +44 (0)1823 577998 Registered Office: 1A Parliament Square, Parliament Street, Crediton, Devon, EX17 2AW Registered in England and Wales No. 8300933 VAT No. 923955793 come forward under the 2023 Framework which included more flexibility between social rent and affordable rent. The policy wording would benefit from outlining the general flexibilities around the approach will depend on the circumstances of the scheme.

Full name: Damien Lynch

Organisation (where relevant): Planning Issues

Other party name (if relevant): Churchill Living and McCarthy Stone

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A generic one size fits all approach has not been justified in this case. Yet the introduction to the policy states: Specifically included under policy are schemes for specialist housing for older people, which must provide affordable housing, where the site is delivering self-contained units (C3 and C2) Provision must accord with the levels set out below. The above requirements include the percentage target of affordable housing together with the tenure mix of affordable housing including social rented and intermediate forms of affordable housing. This is quite confusing given the council's own evidence base states this is not required in terms of housing need and unviable in all of the locations where land is considered to be available to deliver overall housing needs. The policy goes on to state that: Where the requirements set out in this policy are not proposed to be met, applicants must submit development viability evidence to justify departure. Where a lower percentage level or differing tenure mix of provision is agreed on viability grounds developers will be required to enter into an agreement that allows affordable housing contributions to be made in the future should higher levels become viable (e.g. through an 'overage' clause). The Council will also reappraise viability on subsequent phases of large schemes.

This policy is not considered to be sound and is unjustified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We recommend that officers reconsider this policy to introduce specific reference as to how specialist housing proposals will be processed in line with affordable housing need and viability. As per our detailed previous submissions, we will happily engage with officers in order to arrive at a policy which works in practice It is clearly based upon previous engagement in the area, local registered providers do not wish to manage on site affordable housing on these schemes for management and affordability reasons. To continue to expect this within the emerging policy is unreasonable and unrealistic in our view and a bespoke and workable affordable housing policy for older persons housing is entirely warranted. This is especially the case given that the housing needs for this typology represents broadly 10% of housing requirements over the plan period.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

4.52. Strategic Policy HN02 considers affordable housing provision. The supporting text to the policy notes that there is a high level of affordable housing need in the district, with high house prices and rents. The policy specifies affordable housing requirements for different areas and types of development, ensuring affordability in perpetuity and integration with market housing.

4.53. It states that to foster balanced and mixed communities, affordable housing will be required on all developments above a certain size. It also notes that the policy includes schemes for specialist housing for older people, which must provide affordable housing, where the site is delivering self-contained units (C3 and C2).

4.54. In terms of the Land to the South of Littleham, the policy states that 30% affordable housing is to be provided at all Local Plan allocated sites with the exception of the second new community, sites at Sidmouth and Budleigh Salterton as well as Axminster, and any windfall site across East Devon.

4.55. This need is to be met through a mix of social rent (65%) and intermediate or other forms of affordable housing (35%), which it is assumed would be shared ownership and discounted market sales. This approach aligns with national planning policy, which requires local authorities to make sufficient provision for affordable housing in local plans, explaining that plans should set out how developers should contribute to providing such housing, including the amount and types of affordable housing required. These affordable housing contributions should be based on evidenced need and not undermine the deliverability of development. In regard to the last point, it is noted, at Paragraph 8.4, the policy is supported by local evidence from

the East Devon Local Housing Needs Assessment (whilst Bloor Homes has also had regard to the Exmouth Housing Needs Assessment that was prepared for Exmouth Town Council in March 2024).

4.56. Strategic Policy HN02 also notes that the affordable housing units are to be provided on-site and dispersed in small clusters in a way that is indistinguishable in terms of design and materials from any market housing and be in a mix of property sizes and types across the site, demonstrating how the site responds to robust, up to date evidence about housing need. In addition, the policy states that applicants can submit development viability evidence to justify a departure from the policy position and that residential institutions such as C2 care homes are exempt from the policy.

4.57. In order to achieve the level of affordable housing requirement set out in the policy, it is critical that it can be demonstrated that this level of provision is viable when considered alongside all other contributions sought through the Local Plan.

4.58. It is essential for the overall soundness of the plan that the proposed affordable housing quantum, which is higher than the % level in the extant Development Plan is subject to robust viability assessment. It should have regard to all other policy requirements for development and ensure that the total policy 'ask' is clearly assessed as part of a robust viability model to inform the plan. It is essential that affordable housing requirement figure is robustly tested prior to Examination in order for the policy to be found sound.

4.59. At present, there is limited certainty that this level of affordable housing is deliverable, noting that the infrastructure requirements associated with some of the proposed allocations (which are in some instances very extensive) do not appear to have been costed. Evidently, there is a requirement for further assessment, as it would seem likely that the percentage of affordable housing identified is unlikely to be viable at least in association with those proposed allocations where infrastructure is a requisite need.

4.60. Strategic Policy HN02 as drafted is unsound as this will likely undermine the deliverability of the Local Plan, which, in turn, could compromise the ability to deliver the overall housing requirement. This is not consistent with national guidance, as not only could it jeopardise the delivery of homes more generally but it will reduce the number of affordable homes actually delivered. This does not represent positive planning.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put

forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4.61. The policy should be modified to seek a level of affordable housing which is viable. This in turn is likely to require the delivery of a greater number of homes than identified above to meet affordable housing needs.

4.62. Bloor Homes objects to this policy.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy HN02 and others

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please see Supporting Statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Please see Supporting Statement

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): Sidbury LVA LLP

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: We are generally in support of the proposed 30% affordable housing requirement for "all other local plan allocated sites".

We consider this proportion of affordable housing more reflective of both local housing needs as well as the need to ensure new developments are viable. In this respect, we consider the emerging policy position on affordable housing as more realistic than that of the adopted Local Plan.

We do however encourage the Council to ensure that the supporting evidence base is robust and supports the proposed affordable tenure splits.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that Sidbury LVA LLP is present to participate in the hearing session for Policy HN02 owing to their interest in Land South

of Furzehill (Sidm_34). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): 3West Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: We are generally in support of the proposed 30% affordable housing requirement for "all other local plan allocated sites".

We consider this proportion of affordable housing more reflective of both local housing needs as well as the need to ensure new developments are viable. In this respect, we consider the emerging policy position on affordable housing as more realistic than that of the adopted Local Plan.

We do however encourage the Council to ensure that the supporting evidence base is robust and supports the proposed affordable tenure splits.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that 3West Group is present to participate in the hearing session for Policy HN02 owing to their interest in the Land

north and east of Exton Farm (Wood_28). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: Nathan Price

Organisation (where relevant): Tetlow King Planning

Other party name (if relevant): South West Housing Association Planning Consortium

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement. The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District. Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no mention of First Homes at all within the consultation document, it is assumed that the

Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent? Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024): "Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added) A blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of site this applies to, and how 'small' these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

Full name: Frances Lennon

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Strategic Policy HN02: Affordable housing [Comments]

2.24 It is agreed that relevant affordable housing provisions should be made within the plan as part of supporting communities across East Devon and to meet needs arising during the plan period.

2.25 To complement the approach being taken by Policy HN02 it would be useful if the policy or the supporting text (associated with this policy) clarified the level of affordable housing provision which is being targeted via the plan (and its associated policies) and how this is meeting the evidenced levels of need arising via the Council's Local Housing Needs Assessment (HOU-002).

2.26 Elsewhere in the plan (at Paragraph 3.10) it is stated that the affordable housing target for the plan is some 4,400 new affordable homes; however, this is significantly short of the stated need (from HOU-002) at around 8,000 affordable homes or around 400 new affordable homes per year.

2.27 The plan as drafted is unlikely to be making provision to meet all of the identified affordable housing needs via Policy HN02 and accounting for other mechanisms for affordable housing delivery. This points to the plan needing to provide for higher levels of housing growth overall, consistent with the objective stated elsewhere to "maximise the delivery of affordable housing across East Devon" and this should be reviewed further by the Council.

Full name: Andrew Ross

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Strategic Policy HN02: Affordable housing [Comments]

2.22 It is agreed that relevant affordable housing provisions should be made within the plan as part of supporting communities across East Devon and to meet needs arising during the plan period.

2.23 To complement the approach being taken by Policy HN02 it would be useful if the policy or the supporting text (associated with this policy) clarified the level of affordable housing provision which is being targeted via the plan (and its associated policies) and how this is meeting the evidenced levels of need arising via the Council's Local Housing Needs Assessment (HOU-002).

2.24 Elsewhere in the plan (at Paragraph 3.10) it is stated that the affordable housing target for the plan is some 4,400 new affordable homes; however, this is significantly short of the stated need (from HOU-002) at around 8,000 affordable homes or around 400 new affordable homes per year. It is also likely that at some locations in particular, such as Sidmouth, the level of affordable housing to be delivered via polices in the plan will be significantly short of evidenced levels of need, where the recently completed Local Housing Needs Assessment (undertaken for Sidmouth Town Council) which found that "There is significant need for additional affordable housing, both for general needs and special need for older people in Sidmouth on an annual basis". This need was quantified to be around 65 new affordable homes per annum (current policies would provide for only this amount over the plan period as a whole, rathe than each year).

2.25 The plan as drafted is unlikely to be making provision to meet all of the identified affordable housing needs via Policy HN02 and accounting for other mechanisms for affordable housing delivery. This points to the plan needing to provide for higher levels of housing growth overall, consistent with the objective stated elsewhere to “maximise the delivery of affordable housing across East Devon” and this should be reviewed further by the Council. This is specifically relevant for Sidmouth where housing delivery is below the levels that would be expected for this main centre and where there are specific and acute needs for local affordable housing provision.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on issues raised and respond as appropriate during hearings.

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: To ensure the Local Plan is sound the text 'Any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development' should relate only to windfall sites inside settlement boundaries. Otherwise this will create confusion with Exception Housing Policy HN10 and Strategic Policy SP06. The latter policy aim is to direct development to sites within settlement boundaries and the former policy seeks to permit community led affordable housing schemes on sites adjacent to settlement boundaries. Exception schemes would be difficult to achieve as when an exception site is an exception site and when is it a windfall site subject to Policy HN02. This aspect of the policy is thus inconsistent with the aims of the Local Plan to maximise affordable housing provision. To take out the reference to outside the village boundaries provides greater clarity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Any windfall site across any part of East Devon, inside settlement boundaries, that is not allocated for housing development.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Why is the percentage 30% and not 35% on all sites? It creates confusion in that allocated sites are 30% but windfall sites are 35% in most villages.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Percentage should be 35% on windfall sites to avoid confusion and to achieve the aim of the Local Plan to maximise affordable housing provision

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is unclear why the threshold is 6 or more dwellings in designated rural areas and not a lower threshold as permissible NPPF para 65. A lower threshold would be more likely to achieve more affordable housing consistent with the aims of the Local Plan. This is particularly the case in smaller tier 4 villages where a threshold of this size is rarely achieved on non-allocated sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Threshold of 5 or more dwellings in designated rural area.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: will halwyn

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: I feel the percentages of affordable housing seem low. If we are to justify the loss of farmland and natural environment it should be for necessity.

Full name: David Morgan

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Strategic Policy HN02: Affordable housing (pages 129-130).

Comment: The strategy for this policy does not provide a robust enough commitment to delivering affordable housing provision in Tier 2 towns. Historically, this flexible approach has resulted in many Tier 2 towns missing out on affordable housing provision because there has either not been sufficient commitment by the Local Planning Authority to enforce it, or there has been acceptance of alternative of funding being provided by a house building developer for off-site provision of new affordable housing. Unfortunately, this latter approach does not adequately answer the obvious question of 'where will this affordable housing be accommodated', or whether it will continue to be provided in that same settlement. Many large schemes, such as in Seaton, have not seen affordable housing materialising, or there has been a reduction in the percentage of affordable housing delivered. Neither approach is acceptable, with greater commitment needed by the Local Planning Authority to actively ensure it is delivered in communities were new build developments are taking place.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: [Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West.]

Draft Strategic Policy HN02: Affordable housing Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF. The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement. The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District. 3 Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no mention of First Homes at all within the consultation document, it is assumed that the

Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent? Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024): "Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added) This principle with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported. However, a blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As such, affordable housing should only be secured in perpetuity on rural exception sites. The SWHAPC recommends that, in line with national planning policy, the policy wording is changed to only relate to rural exception sites. Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of site this applies to, and how 'small' these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Tetlow Planning as an agent on behalf of the South West Housing Association Planning Consortium (SWHAPC)

Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF.

Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024): "Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added) This principle with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: However, a blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As such, affordable housing should only be secured in perpetuity on rural exception sites. The SWHAPC recommends that, in line with national planning policy, the policy wording is changed to only relate to rural exception sites.

Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of site this applies to, and how 'small' these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement. The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District.

Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no mention of First Homes at all within the consultation document, it is assumed that the Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent?

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Strategic Policy HN02 outlines that affordable housing will be required on all developments, unless exempted under this policy, with a capacity of 6 or more dwellings in designated rural areas and 10 or more in non-designated rural areas. The SWHAPC considers this to be an appropriate policy requirement and in accordance with the NPPF.

Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024):

"Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added)

This principle with regard to rural exception sites is appropriate and supported by the SWHAPC as it helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The draft policy also outlines that 25% affordable housing will be required on qualifying developments in Axminster, and 30% affordable at all other local plan allocated sites (except Axminster). A 35% affordable housing requirement is placed at any site allocated for development at the West End, any allocated site in Sidmouth and Budleigh Salterton, as falling within the settlement boundaries, and any windfall site across any part of East Devon, inside or outside settlement boundaries, that is not allocated for housing development. The SWHAPC note that this is a reduction in the current Local Plan policy, outlined at Strategy 34, which states that areas outside of those listed (Axminster, Exmouth,

Honiton, Ottery St Mary, Seaton and major strategic 'West End' development sites) will be subject to a 50% affordable housing requirement.

3 Draft Strategic Policy HN02 states the tenure split to be flexible in Axminster, and in all other areas the draft policy seeks 65% social rent and 35% intermediate or other forms of affordable housing. Further clarification is sought on the 65% social rent aspect and how this applies to both affordable rented and social rented housing. Additional clarification is also required on the 35% 'intermediate or other forms of affordable housing', i.e. is this referring to shared ownership affordable housing, or First Homes2. Given there is no mention of First Homes at all within the consultation document, it is assumed that the Council is not seeking this tenure of affordable home and will not object in principle to applications that do not propose First Homes. Furthermore, in stating 'other forms of affordable housing', does the Council mean part (d) of the national definition of affordable homes in Annex 2 of the NPPF, or does it simply mean other forms of affordable housing, such as affordable rent?

Draft Policy HN02 part (a) adds that affordable housing secured through policy must "Remain affordable in perpetuity". National policy only makes one reference to securing affordable housing in perpetuity, which is in reference to rural exception sites in Annex 2 of the NPPF (December 2024):

"Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing…." (Emphasis added)

However, a blanket approach to securing affordable housing in perpetuity can cause issues for several reasons. Firstly, it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As such, affordable housing should only be secured in perpetuity on rural exception sites. The SWHAPC recommends that, in line with national planning policy, the policy wording is changed to only relate to rural exception sites.

Draft Policy HN02 part (b) adds that affordable housing "Be provided on-site and dispersed in small clusters across the site in a way that is indistinguishable in terms of design and materials from any market housing". There is no guidance as to what size of

site this applies to, and how ‘small’ these clusters should be. It should be noted that this pepper potting approach has practical implications for housing associations when it comes to the management of their housing stock. It is also worth considering that there may be developments that are proposed as 100% affordable, which could be hindered by the wording used in the policy text.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SWHAPC request that this 50% affordable housing requirement for qualifying sites remains within the Local Plan to ensure that affordable housing is maximised within the District.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation (HBF)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or con-sistent with national policy

84. As mentioned in response to Policy HN01: Housing to address needs, without the whole plan viability appraisal the Plan has not justified its policies or shown them to be effective, and the Plan is therefore unsound.

85. It will be important for the delivery of the Plan that where necessary the policies in the Plan to allow for flexibility on viability issues. HBF question would question the robustness of any Local Plan Viabil-ity Assessment which failed to fully consider the wide range of challenges and additional costs and increasing regulations facing developers at this time.

86. For example, HBF information suggests that complying with the current new part L is costing £3500 per plot. The Future Homes Standard Part L in 2025 is anticipated to cost up to £7500+ per plot. There will also be the addition of the Building Safety Levy that is coming in pay for cladding. This will be a per plot basis around the UK, and the figures were published only this week. For East Devon they are £ 17.03 per square metre for brownfield land and £ 34.06 psm for greenfield.

87. Other factors that need to be taken into account include increasing costs of materials and labour due to inflation and the costs of mandatory BNG, which are still emerging as the off-site market is yet to be established. HBF members are reporting costs of £20-30k per off-site BNG unit. Although the initial price of statutory credits is

now known this national fallback option has been deliberately highly priced to discourage their use. Whilst this intention is understandable, at present the lack of functioning local markets for off-site credits causes viability problems because HBF members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable.

88. As the development of older persons housing is different for a number of reasons, including in partic-ular the need for communal space, there to consider the viability of older person's housing differently. The Council's own viability appraisal should acknowledge this factor and model older persons (age restricted) housing separately from the consideration of market and affordable homes.

89. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of eve-ry site or assurance that individual sites are viable, and therefore flexibility in the amount of affordable housing sought may be needed to deal with site specific issues.

90. At a very basic level viability can be improved by reducing costs or increasing values. Sometimes, therefore changing the type of affordable housing provided can help to improve viability of a specific site, and the plan should recognise this. In this example a change of the percentages of different types of affordable housing provided, such as allowing more discounted sale affordable housing, but the headline figure of how much affordable housing is provided would remain the same. This is an-other reason why flexibility within the Affordable Housing policy is needed.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Genuinely Affordable and Social Housing (Strategic Policy HN02 & Broadclyst H4)

• At least 40% affordable housing is required on major developments (HN02).

• Broadclyst's Policy H4 reinforces this, requiring affordable housing to be genuinely accessible to local people, ensuring viability for first-time buyers.

• Specific support for Community Land Trusts (CLTs) to deliver housing tailored to local needs.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Affordable housing is a cornerstone of Broadclyst Parish's long-term vision for a thriving and inclusive community. With rising house prices and increasing demand, many local residents—particularly young families, key workers, and those on lower incomes—struggle to find suitable and secure housing within the parish. Ensuring access to affordable homes is therefore essential to maintaining Broadclyst's strong community identity, supporting local businesses, and preventing the displacement of long-standing residents. The Broadclyst Neighbourhood Plan (NP) recognises the urgent need for affordable housing and sets out locally specific policies to ensure that new developments meet this demand. These policies go beyond the district-wide approach, requiring a higher proportion of affordable homes, prioritising local occupancy, and promoting a mix of tenures, including social rent, shared ownership, and self-build opportunities. The Broadclyst NP also advocates for well-designed, sustainable homes that are integrated within the wider community, ensuring that new developments enhance the parish's character rather than compromise it. By setting clear expectations for affordability, quality, and sustainability, this chapter of the Local Plan, in alignment with the Broadclyst NP, aims to deliver housing that supports Broadclyst Parish's social and economic resilience. Through a combination of strategic site allocations, rural exception sites, and innovative housing solutions, Broadclyst Parish Council is committed to shaping a future where everyone, regardless of income, can find a place to call home.

2.1. Affordable Housing Targets

2.1.1. Strategic Policy HN02 (Affordable Housing) – Requires a minimum of 35% affordable housing on most major developments, with 25% in Axminster. Exceptions apply where viability evidence demonstrates this is unachievable.

2.1.2. Broadclyst NP Policy H4 (Social and Affordable Housing) – States that at least 50% of homes on allocated sites in Broadclyst Parish should be affordable, split equally between social rent and affordable ownership.

2.2. Affordable Housing Design & Integration

2.2.1. Policy HN02 – Requires that affordable housing should be indistinguishable from market housing and integrated within developments.

2.2.2. Broadclyst NP Policy H4 – Emphasizes that affordable homes must be high quality, well-designed, and mixed throughout developments, avoiding clustering.

2.4. Viability Considerations

2.4.1. Policy HN02 – Allows developers to submit viability assessments if they cannot meet the full affordable housing requirement. 5

2.4.2. Broadclyst NP Policy H4 – Acknowledges viability challenges and allows for some market housing where necessary to facilitate affordable housing delivery. Ensuring the delivery of genuinely affordable housing is central to Broadclyst Parish's vision for a sustainable and inclusive community. The Broadclyst Neighbourhood Plan (NP) sets ambitious yet locally focused targets to address affordability challenges, prioritising housing that meets the needs of local residents, key workers, and young families. By requiring a higher proportion of affordable homes in new developments and ensuring these homes remain available to those with local connections, Broadclyst Parish aims to maintain its strong sense of community and prevent displacement due to rising housing costs. The integration of affordable homes within well-designed, mixed-tenure developments will support social cohesion and enhance the quality of life for all residents. Additionally, the Broadclyst NP's commitment to rural exception sites, self-build opportunities, and adaptable housing ensures that the diverse needs of the parish, including those of older people and those requiring accessible accommodation, are met. By aligning with the broader East Devon Local Plan while reinforcing local priorities, these policies provide a framework for delivering high-quality, affordable housing that supports Broadclyst Parish's long-term sustainability. Through proactive planning and ongoing engagement, the parish seeks to create a future where housing remains accessible to those who contribute to and enrich the local community.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We support the requirement for a minimum affordable housing provision. However, this should be strengthened to ensure:

1.3.1. A mix of tenures, including social rent, shared ownership, and low-cost homeownership, in line with NPPF paragraph 65

1.3.2. Affordability criteria linked to local income levels rather than national averages, ensuring genuine accessibility for local residents.

1.3.3. A requirement that affordable homes remain available for local people in perpetuity, supported by NPPF paragraph 78, which encourages rural housing policies to meet local needs.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN02

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: There is a concern, brought on by the experience of other local plans, that despite all the good words in the policy there will not be enough affordable housing provided because developers will get out of their commitments by claiming that they are not viable. This is the hole down which the provision of affordables has never been delivered by any district council anywhere, as the viability argument is a game of smoke and mirrors.

The worry is that the new community requirement should be at least that of normal developments, on the basis that the economies of scale brought about by the larger allocation should mitigate the cost of cost of not selling for the market price.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The provision of a required number of affordable and social housing on a site should be an absolute requirement not something that is seen by developers as something they can avoid. If the scheme is not viable with affordables, the land is not worth what the developers paid for it. A simple fact.

HN03

Full name: Dee Woods

Organisation (where relevant): Otter Valley Association

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: In addition, with an above average older population, more smaller and adapted homes are required for the elderly. Many more small homes are also required for first time buyers, who are priced out of the market.

Full name: Jeremy Woodward

Organisation (where relevant): Vision Group for Sidmouth

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: We wish to challenge this Policy's justifications: see Point 3 below

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: THE ED LOCAL PLAN WILL NOT SATISFY HOUSING NEED IN SIDMOUTH; RATHER, IT WILL ENSURE THAT SIDMOUTH WILL BECOME EVEN MORE OF AN 'UNBALANCED COMMUNITY'. The 2017 Housing Needs Assessment for Sidmouth commissioned by Sidmouth Town Council]https://sidmouth.gov.uk/wp-content/uploads/2020/12/Housing-Needs-Assessment.pdf] formed the basis of the Housing Policies of the 2019 Sid Valley Neighbourhood Plan – which sought to satisfy housing need in Sidmouth. [https://visionforsidmouth.org/the-sid-valley-needs-more-of-the-right-sort-of-housing/] It made clear that the planning authorities should focus on providing for the needs of its local population, especially its younger residents: "One key part of the plan is making sure affordable homes in the valley go to local people, particularly the area's young people. Affordable homes will only be allocated to people who have a connection to the Sid Valley." [See Policy 13 of the SVNP: Connection] A newly-commissioned Housing Needs Assessment for Sidmouth [https://sidmouth.gov.uk/wp-content/uploads/2024/01/PL.-MINS.-290125-1.pdf] has been presented to Sidmouth Town Council – and reiterates the failure of the planning authorities to provide for the needs of its residents: "The survey concluded that Sidmouth was not a balanced community and provided pertinent data which should be relevant for the new Local Plan, any planning applications within Sidmouth." [Housing Needs Survey undertaken by CNB Housing Insight: 2025] The survey was attached to the agenda of the Town Council's planning committee [https://sidmouth.gov.uk/wp-

content/uploads/2024/01/290125-Planning-Agenda-_.pdf] meeting in January – and has been passed on with permission. The following extracts are specific for Sidmouth – the details of which seriously undermine the justifications as laid out in Policy HN03 of Meeting Housing Needs of the ED Local Plan, as this Policy fails to address the imbalance of housing provision. Rather, the focus of the Housing Needs Assessment for Sidmouth is on the 'need' to provide social and affordable housing – and not to consider market housing at all as part of any mix of provision: “Overall conclusions: There is significant need for additional affordable housing, both for general needs and special need for older people in Sidmouth on an annual basis according to our analysis of numbers on the East Devon housing register and analysis of projections for older people. “Overall, Sidmouth will continue to attract incomers and concern is highlighted that local people may not be able to find suitable accommodation that they can afford in Sidmouth. This will worsen an already unbalanced community and affect social cohesion and the long term sustainability of the parish to sustain the support and services needed to sustain the aging population. [Final Housing Needs Assessment for Sidmouth Town Council: October 2024] “An additional 65 to 67 units of general needs affordable housing are needed per-annum if the flow of those in affordable need arising from local people is to be met. If the needs of incomers are taken into account, unmet affordable need rises considerably to between 155 and 157 dwellings per-annum. “Sidmouth is not a balanced community. Factors driving the above growth are older people being attracted to Sidmouth which leads to an imbalance of age groups in the parish skewed toward older people, high house prices and rents compared to East Devon, and an aging population. East Devon projects a district wide growth of 24,274 people aged over 65 by 2043.” [Housing Needs Assessment for Sidmouth Town Council SYNOPSIS January 2025] This analysis simply confirmed what was already understood. In terms of a ‘balanced community’, in 2019, Sidmouth was singled out as one of the towns facing the biggest increase in the elderly in the country [https://visionforsidmouth.org/sidmouth-is-singled-out-as-one-of-the-towns-facing-the-biggest-increase-in-the-elderly/] THE ED LOCAL PLAN DOES NOT RECOGNISE THE DIFFERENCE BETWEEN HOUSING 'NEED' AND HOUSING 'DEMAND'. In his granting last month of the Knowle planning appeal for the provision of ‘housing with care’ and a care home, [https://visionforsidmouth.org/breaking-planning-inspector-allows-knowle-planning-appeal/] the housing inspector made the point that “There is no doubt that there is a clear and pressing need for this type of development in East Devon”. This view was strongly contested by all the parties in Sidmouth – and should be addressed by the ED Local Plan to ensure that any similar planning decisions cannot be justified in future. In particular what must be addressed is the assumption made by the inspector that 'demand' for market housing is the same as 'need' for social and affordable housing. This has already been challenged and should be taken into account by the planning authorities. In 2017, the CPRE looked at the phenomenon of ‘Needless Demand’, where they asked: What’s the difference between ‘need for housing’ and ‘demand for

housing'? This study should be included in any analysis of planning for housing provision in East Devon. [https://futuresforumvgs.blogspot.com/2017/09/needless-demand-or-whats-difference.html] This question had also been asked at Devon County Council, in 2013, when Cllr Julian Brazil noted that "it would be impossible to build to meet demand because there is a never-ending queue of people who want to move to Devon." [https://futuresforumvgs.blogspot.com/2013/11/housing-it-would-be-impossible-to-build.html] This is directly referred to in point 6.5 of the 2024/25 Housing Needs Assessment for Sidmouth, which states: "Overall, Sidmouth will continue to attract incomers and concern is highlighted that local people may not be able to find suitable accommodation that they can afford in Sidmouth. This will worsen an already unbalanced community and affect social cohesion and the long term sustainability of the parish to sustain the support and services needed to sustain the ageing population." As pointed out by observers [https://futuresforumvgs.blogspot.com/2013/12/migration-sidmouth-and-east-devon.html] the fact is that Sidmouth is largely made up of 'migrants' from elsewhere in the UK, that the town has long been a retirement haven for the well-heeled, and that it has always attracted people from outside the area – the 2011 Census detailing that the migration of population into East Devon from other parts of the UK show that there were 1130 more people moving into the area than out. [www.eastdevon.gov.uk/knowing_east_devon_version_1.0-2.pdf and https://visionforsidmouth.org/housing-need-and-net-migration-incomers/] This trend should be taken into consideration by the planning authorities: "the migration of population into East Devon from other parts of the UK show that in 2017 there were 2,620 more people moving into the area than out". [https://eastdevon.gov.uk/council-and-democracy/knowing-east-devon/knowing-east-devon-summary/people/] THE ED LOCAL PLAN SHOULD SUPPORT DEVELOPMENT BY SECURING A MORE DIVERSE SUPPLY OF AFFORDABLE HOUSING FOR OLDER AND YOUNGER PEOPLE IN SIDMOUTH In conclusion: Policy HN03: Housing to meet the needs of older people in the ED Local Plan fails to address the central issue of creating balanced communities and therefore cannot be justified. Instead, the Policy should read: "the Council should not support development which encourages a still larger supply of market housing for older people in Sidmouth". The market already caters for the 'demands' of incomers; the council should intervene to ensure that it meets the 'needs' of the already-resident older and younger people of Sidmouth by enabling the better provision of social and affordable housing. The Strategic Policy HN01 does indeed "Seek to maximise the delivery of affordable housing across East Devon in order to meet identified needs of people who are not able to access the general housing market" [which includes "market housing for rent as well as for home ownership"]; and to realise this, Policy HN02 states that "To foster balanced and mixed communities affordable housing will be required on all developments" [35% affordable housing – with 65% of that as Social Rent]. However, this is undermined by Policy HNo3: by stating that "the Council will support development that widens choice by securing a more diverse supply of market and

affordable housing for older people in East Devon", the Council will simply encourage more of the Knowle-type development, namely further ghettoised accommodation for the elderly from outside East Devon who can afford such 'market housing'. There it not a "growing need for diverse housing options for East Devon's ageing population" as stated in the Justifications; rather, there is a growing market 'demand' for such which must be countered by more robust determination to ensure a more truly balanced community, whereby younger and less affluent elderly populations can be properly catered for. The other HN Policies do indeed demonstrate such a determination and should be praised for doing so; however, these are undermined by the overenthusiastic embrace of 'a more diverse supply of market housing' in Policy HN03 which cannot be justified. Finally, East Devon requires accommodation which can work just as well as starter homes as they do as end-of-life homes; rather than thinking in terms of age range, planners and indeed developers should be thinking in terms of function. Homes which are easy to maintain and use should appeal to both elderly and those starting out – as dealt with in Policies NH04, 06 and 08 – all of which would be negated by encouraging the development of age-restricted gated communities for 'the market', as at Knowle. Sidmouth is a vibrant community, "where over-90s are having the time of their lives": as reported recently, "the Devon town has only 842 residents under 30 — and 1,100 over 80 — and yet somehow it works, thanks to a strong sense of community and plenty of willing volunteers." Sidmouth can adapt and can develop, based on this community spirit – and yet too much specialist market housing for the incoming elderly will threaten this vibrancy, as evidenced in the Housing Needs Assessment. [https://www.thetimes.com/uk/society/article/welcome-to-sidmouth-where-over-90s-are-having-the-time-of-their-lives-pkl07sch6]

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Generally, the Policies of the Meeting Housing Needs chapter are sound. Nevertheless, the October 2024 Housing Needs Assessment, commissioned by Sidmouth Town Council – specifically the recommendations under 6.11 – should be referenced in the Meeting Housing Needs chapter 8 of the ED Local Plan in order to make it more sound: "Many housing and accommodation issues are identified in the HNA report and the town council may also wish to consider how better use can be made of the housing stock to address its aims. The following could be considered:

• engaging with land owners and housebuilders and asking them to deliver a mix of housing and accommodation that would more closely meet local need;

• enabling a small annual programme of newbuild affordable homes prioritised to meet local need. In this way the most urgent need will be met;

• recognising that suitable exception sites will both help deliver an annual supply of affordable housing and ensure that local people benefit from this supply;

• enabling a supply of additional affordable specialised housing for older people which will indirectly assist in housing younger households due to vacancies in the system;

• forming partnerships with housing associations so that small scale development opportunities can address local need; consideration of innovations such as encouraging local people to form and deliver community led housing schemes, possibly by means of a Community Land Trust;

• working with the district Council to agree a Sidmouth Parish local lettings policy and reviewing local connection criteria that would apply to Sidmouth that would ensure that local needs are prioritised and enable younger people to return to the parish; and

• working with the district council to develop policies that minimise vacant homes and discourage second homes.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: We wish to challenge this Policy's justifications: see Point 3 above

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The need to support provision for older people is definitely supported. This promotion does not need to be necessarily by age restricted housing and can be provided in part by housing mix on sites. For example, a proportion of bungalows supports potential downsizers in a way that is not possible if this type of stock is not available. This type of housing could be added as something that the council could support.

This policy also states that extra care schemes are a C3 use class. This is not necessarily the case and the use class will depend on the particular circumstances and level of care being provided. Extra care can be C2 as demonstrated in many applications and appeal decisions. This restriction should be removed from the local plan as it will stifle the sort of developments that are needed and the local plan is seeking to encourage.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Supporting bungalows and omitting reference to Extra care being a C3 use class.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Vistry support the principle of Policy HN03 and recognise the importance of housing to meet the needs of older people, given that evidence suggests that there is a need for a greater number of units for older persons due to an aging demographic across the District. However, we are concerned that greater emphasis must be placed on the viability of this provision as some sites may not be suitable for older persons specialist housing.

It is noted that the requirement for housing proposals, subject to commercial viability, "schemes for 200 or more dwellings should include at least 10% as on-site as specialist older persons dwellings as either C3 dwellings and/or C2 equivalents".

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The reduction from 20% to 10% for schemes over 200 dwellings is welcomed, however Vistry consider that the current policy wording is not effective, nor justified, as it fails to consider the specific locational needs of specialist housing (such as proximity to town centres or well established public transport routes), which may render such dwellings typologies unsuitable for major development sites. At present therefore, the policy is not considered sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The proposed policy text should be reworded to recognise that older persons units will only be required where there is up to date evidence and an evidenced market demand, subject to viability.

Addlepool Farm would create a new sustainable village and destination. Should there be a demand for specialised homes, in accordance with this Policy, these could be delivered as part of the future scheme.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

3.1 Policy HN03 requires that residential schemes for 50-199 homes are required to meet the requirements relating to older person homes.

3.2 The policy stipulates that for residential developments of 50-199 homes, a minimum of 10% of the homes should be designated for specialist older person housing (Class Use C3). While it is acknowledged that the provision of specialist housing for older persons is important, it is recommended that consideration be given to the viability of such provision, considering the specific location of the development. Site constraints may impact the feasible proportion of specialist older person homes that can be delivered. Additionally, it is important to recognise that residents of specialist housing may have particular locational needs, such as proximity to town centres or well-established public transport routes. They may also require closer access to community facilities and services. Therefore, it should be recognised that not all sites may be suitable for specialist housing delivery. In such cases, the Council should adopt a flexible approach when applying the requirements of this policy.

3.3 Market demand for housing to meet the needs of older people should also be considered as part of this policy. Should there be no demand for housing to meet the needs of older people, such homes should be reverted to market housing.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Whilst addressing the growing need for diverse housing options within East Devon is supported by PHSW, the policy should include sufficient flexibility to consider sites on a case-by-case basis to ensure that local needs are considered. Whilst the reduction from a 20% requirement of specialist older persons dwellings to 10% is welcomed, as worded there is currently no mechanism for off-site contributions if necessary.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy text should therefore be updated to include sufficient flexibility for sites to be considered on a case-by-case basis.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

Extra care housing is stated to be a C3 use but whether such a use falls into C2 or C3 depends on the accommodation and facilities provided, the level of care and services offered as part of the accommodation, and the specific care needs of the occupants. Whether a property is C2 or C3 has implications for Section 106 obligations so this needs to be assessed on a case-by-case basis.

While the aim of increasing the amount of specialist accommodation is admirable the blanket requirement for all general housing schemes of 50 to 199 homes to provide 10% of dwellings as 'specialist older person dwellings (C3)' and for schemes of 200+ to provide 10% dwellings as 'specialist older person dwellings (C3) and/or C2 equivalents' is not supported.

Firstly, it is not clear what is meant by 'specialist older persons dwellings' (and how this relates to the requirements of Policy HN04 discussed further below) or how the two threshold requirements differ. It is noted the Three Dragons Viability Assessment refers to 10% bungalows, but this is not what is set out in the policy.

Secondly it is not reasonable to impose a blanket percentage requirement as the provision and composition of such accommodation should be based on evidenced

need. Further for the C2 accommodation this would need interest from a care operator/provider which may not be available.

While the reference to commercial viability is welcomed (noting the apparent conflict between the Viability Assessment and the policy as to what is meant by the policy) , mandating the provision of a percentage of older person housing where the earlier criteria listed at A – F in the policy may not be achievable (for example H - having flat topography) and/or place additional burdens on developers (for example F - the need for a Care Needs Assessment) is not reasonable.

Further in regard to viability the Viability Assessment confirms that older persons housing is not viable in Axminster as tested so a blanker requirement is not justified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are will generally be considered as falling within Use Class C3 (dwellings) subject to information being provided regarding the level of care and facilities provided and the needs of the residents.

The blanket requirement for a percentage of older persons housing should be deleted.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Extra care housing is stated to be a C3 use but whether such a use falls into C2 or C3 depends on the accommodation and facilities provided, the level of care and services offered as part of the accommodation, and the specific care needs of the occupants. Whether a property is C2 or C3 has implications for Section 106 obligations so this needs to be assessed on a case-by-case basis.

While the aim of increasing the amount of specialist accommodation is admirable the blanket requirement for all general housing schemes of 50 to 199 homes to provide 10% of dwellings as 'specialist older person dwellings (C3)' and for schemes of 200+ to provide 10% dwellings as 'specialist older person dwellings (C3) and/or C2 equivalents' is not supported.

Firstly, it is not clear what is meant by 'specialist older persons dwellings' (and how this relates to the requirements of Policy HN04 discussed further below) or how the two threshold requirements differ. It is noted the Three Dragons Viability Assessment refers to 10% bungalows, but this is not what is set out in the policy.

Secondly it is not reasonable or practical to impose a blanket percentage requirement as the provision and composition of such accommodation should be based on evidenced need. Further for the C2 accommodation this would need interest from a care operator/provider which may not be available.

While the reference to commercial viability is welcomed (noting the apparent conflict between the Viability Assessment and the policy as to what is meant by the policy) , mandating the provision of a percentage of older person housing where the earlier criteria listed at A – F in the policy may not be achievable (for example H - having flat topography) and/or place additional burdens on developers (for example F - the need for a Care Needs Assessment) is not reasonable.

Further in regard to viability the Viability Assessment confirms that older persons housing is not viable in Axminster as tested so a blanket requirement is not justified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy should be amended as follows:

Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care will generally be considered as falling within Use Class C3 (dwellings) subject to information being provided regarding the level of care and facilities provided and the needs of the residents.

- The blanket requirement for a percentage of older persons housing should be deleted.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Extra care housing is stated to be a C3 use but whether such a use falls into C2 or C3 depends on the accommodation and facilities provided, the level of care and services offered as part of the accommodation, and the specific care needs of the occupants. Whether a property is C2 or C3 has implications for Section 106 obligations so this needs to be assessed on a case-by-case basis. While the aim of increasing the amount of specialist accommodation is admirable the blanket requirement for all general housing schemes of 50 to 199 homes to provide 10% of dwellings as 'specialist older person dwellings (C3)' and for schemes of 200+ to provide 10% dwellings as 'specialist older person dwellings (C3) and/or C2 equivalents' is not supported. Firstly, it is not clear what is meant by 'specialist older persons dwellings' (and how this relates to the requirements of Policy HN04 discussed further below) or how the two threshold requirements differ. It is noted the Three Dragons Viability Assessment refers to 10% bungalows, but this is not what is set out in the policy. Secondly it is not reasonable to impose a blanket percentage requirement as the provision and composition of such accommodation should be based on evidenced need. Further for the C2 accommodation this would need interest from a care operator/provider which may not be available. While the reference to commercial viability is welcomed (noting the apparent conflict between the Viability Assessment and the policy as to what is meant by the policy) , mandating the provision of a percentage of older person housing where the earlier criteria listed at A – F in the policy may not be achievable (for example H - having flat topography) and/or place additional burdens on developers (for example F - the need for a Care Needs Assessment) is not reasonable. Further in regard to viability the Viability Assessment confirms that older persons housing is not viable in Axminster as tested so a blanker requirement is not justified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are will generally be considered as falling within Use Class C3 (dwellings) subject to information being provided regarding the level of care and facilities provided and the needs of the residents. The blanket requirement for a percentage of older persons housing should be deleted.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Obsidian Strategic Asset Management

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: While the aim of increasing the amount of specialist accommodation is admirable the blanket requirement for all general housing schemes of 50 to 199 homes to provide 10% of dwellings as 'specialist older person dwellings (C3)' and for schemes of 200+ to provide 10% dwellings as 'specialist older person dwellings (C3) and/or C2 equivalents' is not supported.

Firstly, it is not clear what is meant by 'specialist older persons dwellings' (and how this relates to the requirements of Policy HN04 discussed further below) or how the two threshold requirements differ. It is noted the Three Dragons Viability Assessment refers to 10% bungalows, but this is not what is set out in the policy.

Secondly it is not reasonable to impose a blanket percentage requirement as the provision and composition of such accommodation should be based on evidenced need. Further for the C2 accommodation this would need interest from a care operator/provider which may not be available. While the reference to commercial viability is welcomed (noting the apparent conflict between the Viability Assessment and the policy as to what is meant by the policy) , mandating the provision of a percentage of older person housing where the earlier criteria listed at A – F in the policy may not be achievable (for example H - having flat topography) and/or place additional burdens on developers (for example F - the need for a Care Needs Assessment) is not reasonable.

The cumulative costs of the provision of different housing tenures – older peoples housing, affordable housing, self build etc – must be properly assessed in terms of impacts on deliverability.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy should be amended as follows:

Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are will generally be considered as falling within Use Class C3 (dwellings) subject to information being provided regarding the level of care and facilities provided and the needs of the residents.

The blanket requirement for a percentage of older persons housing should be deleted.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Cavanna Homes (Cavanna)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Extra care housing is stated to be a C3 use but whether such a use falls into C2 or C3 depends on the accommodation and facilities provided, the level of care and services offered as part of the accommodation, and the specific care needs of the occupants. Whether a property is C2 or C3 has implications for Section 106 obligations so this needs to be assessed on a case-by-case basis. While the aim of increasing the amount of specialist accommodation is admirable the blanket requirement for all general housing schemes of 50 to 199 homes to provide 10% of dwellings as 'specialist older person dwellings (C3)' and for schemes of 200+ to provide 10% dwellings as 'specialist older person dwellings (C3) and/or C2 equivalents' is not supported. Firstly, it is not clear what is meant by 'specialist older persons dwellings' (and how this relates to the requirements of Policy HN04 discussed further below) or how the two threshold requirements differ. It is noted the Three Dragons Viability Assessment refers to 10% bungalows, but this is not what is set out in the policy. If bungalows are envisaged this has land capacity implications on allocated sites needs to allow for the additional space requirements to provide this type of housing - bungalows take twice the land so additional land will need to be allocated to reach the housing numbers. Secondly it is not reasonable to impose a blanket percentage requirement as the provision and composition of such accommodation should be based on evidenced need. Further for the C2 accommodation this would need interest from a care operator/provider which may not be available. www.carneysweeney.co.uk While the reference to commercial viability is welcomed (noting the apparent conflict between the Viability Assessment and the policy as to what is meant by the policy) , mandating the provision of a percentage of older person housing where the earlier criteria listed at A – F in the policy may not be achievable (for example H - having flat topography) and/or place additional burdens on

developers (for example F - the need for a Care Needs Assessment) is not reasonable. Further in regard to viability the Viability Assessment confirms that older persons housing is not viable in Axminster as tested so a blanket requirement is not justified.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The policy should be amended as follows (new text underlined): Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are will generally be considered as falling within Use Class C3 (dwellings) subject to information being provided regarding the level of care and facilities provided and the needs of the residents. The blanket requirement for a percentage of older persons housing should be deleted.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Laura Grimason

Organisation (where relevant): Gillings Planning

Other party name (if relevant): Frontier Estates Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Whilst my client is broadly supportive of HN03 due to its promotion of a range of specialist accommodation types for the elderly in response to an ageing population, it is respectfully requested that the following comments on the detail of this policy are reflected in the plan as it progresses towards adoption. Suggested changes are explained below.

• Deletion of the word 'affordable' in the second sentence of the first paragraph. As this paragraph refers to both market and affordable housing for older people, it is understood that this word has been included in error and that the list is intended to refer to both market and affordable housing for older people.

• Suggested amendment to the first point B of the policy to ensure it is not overly restrictive regarding the location of sites in proximity to local facilities and shops and recognising that in some cases, sites may be more than 400m from these but could still be considered accessible to them due to availability of bus routes etc. The suggested amendment still requires sites to be accessible to these but is less prescriptive on a specific distance.

• Suggested amendment to the first point D of the policy to ensure that it is not overly restrictive in relation to topography and highways works. Regarding topography, this will vary on a site by site basis and a site is not automatically inaccessible if it is not flat. Regarding highways works, these will not be required in all cases and so the amended wording requests these only where deemed necessary and feasible.

• Inclusion of a sentence to note that on sites allocated for residential development, Use Class C2 will also be acceptable with an overarching aim to create mixed and balanced communities. This is included in the adopted local plan and we consider it appropriate to take this forward in the emerging local plan in a proactive approach. The suggested alternative wording for HN03 is as follows: 'The Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. Specialist affordable housing for older people, falling under this policy, will specifically include:

• Residential care homes and nursing homes;

• Extra care housing or housing-with-care;

• Retirement living or sheltered housing;

• Age-restricted general market housing. Any development proposals with housing to accommodate older people will need to: A. Demonstrate how the design and layout addresses the health and well-being needs of older people including, where appropriate to the proposal, those with dementia and other long-term conditions; B. Demonstrate that the site is accessible to Locate all older person housing within 400 meters walking distance of local facilities and shops; C. Be well-served by public transport; D. Have high levels of accessibility flat or relatively flat neighbouring topography, incorporating provision of dropped kerbs and pedestrian road crossings where necessary and feasible to promote access by ambulant older people, wheelchair users and mobility scooters; E. Provide adequate communal facilities, including on-site accommodation where required, for essential staff; F. Be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type. Planning applications for different types of specialist housing for older people, will be determined on the basis that: Use Class C3 (dwellings) - Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care are in Use Class C3 (dwellings); Use Class C2 - Residential care home and nursing home accommodation (including end of life/hospice care and dementia care home accommodation) are in Use Class C2; The Use Class of other specialist housing products will be determined taking into consideration the level of care and scale of communal facilities. Use Class C2 proposals will be acceptable on sites allocated for residential development. All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as

follows: A. Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3); B. Schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents. Planning permission that would result in the loss of specialist elderly person housing will be refused unless: A. Evidence demonstrates that there is no longer a need in East Devon for that type of housing; and B. The housing cannot be converted to meet other types of older person need, or that conversion, remodelling, or redevelopment to specialist housing to meet other social care and health needs is not viable. This policy applies across the whole of the local plan area but in the Cranbrook Plan area noting that there may be viability impacts at Cranbrook that will need to be taken into account at planning application stage'.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To discuss requested changes

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Draft Policy HN03 requires: "All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as follows: A: Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3); B: Schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents." The NPPF explains that within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes housing for older people. In this case, no justification has been provided as to how the threshold or requirement has determined. Moreover, some sites may not be suitable for housing for older people and on other sites this type of housing will not be viable. The policy is also unclear as to how "specialist older person dwellings" is defined (beyond Use Class). On this basis, the policy is not considered to be sound as it is not effective or justified or consistent with national policy.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

5.6 Draft Policy HN03 requires: "All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as follows: A: Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3); B: Schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents."

5.7 The NPPF explains that within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes housing for older people.

5.8 In this case, no justification has been provided as to how the threshold or requirement has determined. Moreover, some sites may not be suitable for housing for older people and on other sites this type of housing will not be viable. The policy is also unclear as to how "specialist older person dwellings" is defined (beyond Use Class). On this basis, the policy is not considered to be sound as it is not effective or justified or consistent with national policy.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: For developments of 200 dwellings or more, emerging Policy HN03 requires at least 10% of the dwellings provided within the development to be specialist older person dwellings. Over the longer term, this could equate to 1,000 homes within the second new community.

Whilst potentially having a significant impact on its delivery and viability, the Cherwell Group is also concerned that the application of Policy WS01 and emerging Policy HN03 could create 'mutually irreconcilable' policy tensions. For instance, at present, the Council's masterplan does not propose a local or neighbourhood centre within the Axehayes Farm element of the new community. Should that distribution of land uses be taken forward into the site wide masterplan to be agreed during the development management process, then any proposal that included such services and facilities within Axehayes Farm would conflict with Policy WS01. However, equally, there will remain a requirement for the development proposals to provide housing for the elderly, which, as stated within limb B of the Policy, will need to be within 400m walking distance of local facilities and shops.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have

identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To remedy the effectiveness of the Policy, a greater flexibility should be included within the Policy or its supporting text, or the Local Planning Authority should consider specifically allocating specialist accommodation in the right locations, rather than relying on all housing allocations to make a contribution to meeting needs.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: I support this policy. No further comments on this policy.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy introduces a requirement for all general housing proposals over 50 dwellings to deliver 10% of units as specialist housing for older people (SHFOP) (subject to commercial viability). This aspect of the policy is challenged for a number of reasons.

Firstly, this policy conflicts with itself. Requirement B states that all older person housing will be located within 400m walking distance of local facilities and shops. However, the Manual for Streets (2007) identifies that walkable neighbourhoods are typically characterised by having a range of facilities up to about 800m walking distance (and acknowledges that walking can replace car trips of distances under 2km) (paragraph 4.4.1). Clearly, by requiring SHFOP on all sites over 50 dwellings, there will be circumstances where SHFOP will be delivered beyond the 400m distance to facilities required by the same policy.

Secondly, the Council do not appear to have considered the financial impacts of this policy (and attempted to address this with the subject to commercial viability caveat). SHFOP typically has a depressed market value, which could have a material impact on the viability of site delivery when compounded with other policy requirements (like affordable housing and self-build plots), and other CIL 122 compliant contributions. Without further evidence to support the viability of this requirement, the 10% requirement should be removed as it is not justified.

Thirdly the SHFOP requirements seem excessive and unnecessary given Policy HNO4 requires 100% of dwellings to meet M4(2) standards, making them accessible and adaptable, as well as the 5% M4(3) requirements for affordable housing. We note that M4(2) provides viability challenges in and of itself, and combining these with the SHFOP must create real concerns regarding the deliverability of housing under this Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy introduces a requirement for all general housing proposals over 50 dwellings to deliver 10% of units as specialist housing for older people (SHFOP) (subject to commercial viability). This aspect of the policy is challenged for a number of reasons.

Firstly, this policy conflicts with itself. Requirement B states that all older person housing will be located within 400m walking distance of local facilities and shops. However, the Manual for Streets (2007) identifies that walkable neighbourhoods are typically characterised by having a range of facilities up to about 800m walking distance (and acknowledges that walking can replace car trips of distances under 2km) (paragraph 4.4.1). Clearly, by requiring SHFOP on all sites over 50 dwellings, there will be circumstances where SHFOP will be delivered beyond the 400m distance to facilities required by the same policy.

Secondly, the Council do not appear to have considered the financial impacts of this policy (and attempted to address this with the subject to commercial viability caveat). SHFOP typically has a depressed market value, which could have a material impact on the viability of site delivery when compounded with other policy requirements (like affordable housing and self-build plots), and other CIL 122 compliant contributions. Without further evidence to support the viability of this requirement, the 10% requirement should be removed as it is not justified.

Thirdly the SHFOP requirements seem excessive and unnecessary given Policy HNO4 requires 100% of dwellings to meet M4(2) standards, making them accessible and adaptable, as well as the 5% M4(3) requirements for affordable housing. We note that M4(2) provides viability challenges in and of itself, and combining these with the SHFOP must create real concerns regarding the deliverability of housing under this Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: (PCL Planning on behalf of Waddeton Park Limited (Honiton)): This policy introduces a requirement for all general housing proposals over 50 dwellings to deliver 10% of units as specialist housing for older people (SHFOP) (subject to commercial viability). This aspect of the policy is challenged for a number of reasons. Firstly, this policy conflicts with itself. Requirement B states that all older person housing will be located within 400m walking distance of local facilities and shops. However, the Manual for Streets (2007) identifies that walkable neighbourhoods are typically characterised by having a range of facilities up to about 800m walking distance (and acknowledges that walking can replace car trips of distances under 2km) (paragraph 4.4.1). Clearly, by requiring SHFOP on all sites over 50 dwellings, there will be circumstances where SHFOP will be delivered beyond the 400m distance to facilities required by the same policy. Secondly, the Council do not appear to have considered the financial impacts of this policy (and attempted to address this with the subject to commercial viability caveat). SHFOP typically has a depressed market value, which could have a material impact on the viability of site delivery when compounded with other policy requirements (like affordable housing and self-build plots), and other CIL 122 compliant contributions. Without further evidence to support the viability of this requirement, the 10% requirement should be removed as it is not justified. Thirdly the SHFOP requirements seem excessive and unnecessary given Policy HNO4 requires 100% of dwellings to meet M4(2) standards, making them accessible and adaptable, as well as the 5% M4(3) requirements for affordable housing. We note that M4(2) provides viability challenges in and of itself, and combining these with the SHFOP must create real concerns regarding the deliverability of housing under this Plan.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: in order to provide greater elaboration of the detail of these representations

Full name: Damien Lynch

Organisation (where relevant): Planning Issues

Other party name (if relevant): Churchill Living and McCarthy Stone

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:
CHURCHILL LIVING & MCCARTY STONE RESPONSE TO THE EAST DEVON LOCAL PLAN 2020-2040 (REGULATION 19) CONSULTATION

Please find below our comment on the draft policies within this consultation insofar as they impact the delivery of specialist accommodation for older persons. Comments are submitted on behalf of Churchill Living and McCarthy Stone who together, deliver circa 90% of dedicated older persons housing for sale in the UK each year. The comments reflect the two company's significant experience in delivering specialist housing for older people.

Churchill Living previously made comments on the emerging plan as part of the Regulation 18 consultation exercise.

Viability

Representatives from both Churchill Living and McCarthy Stone attended the Joint Exeter and East Devon viability workshop in 2024 and provided feedback for the consultants to consider after the event. The evidence presented by the respondents included detail of recent planning applications within East Devon and the difficulty encountered in addressing affordable housing policy and viability in respect of

specialist housing for older people. The respondents requested that following the completion of the plan wide viability work that the council consider the introduction of a bespoke affordable housing policy for specialist older person housing development which would allow the developers of such housing to confidently invest in and bring forward planning applications for such housing. The council's plan wide viability study was completed in January 2025 and is included as evidence supporting the draft plan and the policies within. The study examines the viability of specialist housing for older people including sheltered and extra care typologies and arrives at the following conclusions:

Older persons sheltered housing is viable in VA1 with the standard affordable housing requirement for this area. It is not viable elsewhere in East Devon. Extra care housing and care homes are not viable in VA1 or elsewhere in East Devon. And Older persons sheltered housing in VA 7 is viable as tested with 35% affordable housing. Extra care housing is not viable in VA 1 although the extent is limited and suggest that it could be deliverable. Neither sheltered or extra care housing is viable in the VA2-VA5 blended area, even with 0% affordable housing. Separately, an additional sensitivity test was undertaken to explore the viability impact of higher value brownfield sites on sheltered accommodation in VA 1. Testing was undertaken with a nominal £75m/ ha BL V, and the typology remained viable with the headroom reduced from £ 75436/unit to £3,507/unit.

For context, VA1 or value area 1 consists of small pockets of the market within Budleigh and Sidmouth. Table 4.6 of the study reports that in these areas:

And

Activity is the lowest of the five value areas. There are currently no new build properties currently advertised in VA1 area - opportunities to develop in these area, given their coastal setting and flood risk have been limited and therefore it is not surprising that there are no current listings. Rightmove suggests that the majority of properties sold are detached or flats, with all average prices above those used in the testing

VA3 East Devon towns and rural is t he area reported to have the highest activity.

Outside of the proposed new settlement and Cranbrook, this is the area with most future growth. There are both coastal and rural towns and villages and whilst there are some outliers, and particular locations will attract different mixes, prices are generally similar for new builds.

It may be taken from the above key summary points within t he viability study t hat opportunity to bring forward viable older person housing development in East Devon will be constrained by market dynamics and viability but also availability of land The 35% affordable housing target is clearly unviable in the areas where t he study suggests that land will be readily available. This position contrasts with the wider delivery expectations for housing across East Devon. The viability study sets out that the majority of the site allocations are located. on greenfield sites on the edge of towns and villages across East Devon which in turn, the study finds to be viable with 35% affordable housing included. The council's Housing Needs Assessment was published in September 2022 and looks at current and future need for sheltered and extra care housing within East Devon. Figure 7 of the needs assessment sets out modelled demand for older persons housing over the 2020-40 period based on the Housing LIN Toolkit. In summary, the idealised need outcome applying the Housing LIN Toolkit is for 1,631 units of private sheltered housing for sale and 0 units for affordable sheltered housing due to the existing supply. There is a demand for affordable extra care units. Taking the viability study and housing needs assessment together, it is clear that the affordable housing requirements for older persons housing are quite unique and will not reflect general needs developments on greenfield sites which will make up the majority of the housing delivery across the plan period Within the context of the above considerations, the following policies are considered to be unsound given the evidence base underpinning each of these has not justified the requirements.

Policy HN03: Housing to meet the needs of older people Paragraph 1 of the PPG Housing for Older and Disabled people states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. ..... Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking"

Paragraph: 001 Reference ID: 63-001-20190626

The delivery of a suitable level of specialist older persons' housing will be a substantial undertaking over the Local Plan period and unless action is urgently taken the Council will struggle to address this need. This draft policy states that the Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. The policy then goes on to prescribe that Any development proposals with housing

to accommodate older people will need to:

A. Demonstrate how the design and layout addresses the health and well-being needs of older people including, where appropriate to the proposal, those with dementia and other long-term conditions; B. Locate all older person housing within 400 meters walking distance of local facilities and shops; C. Be we/l-served by public transport; D. Have high levels of accessibility with flat or relatively flat neighbouring topography, dropped kerbs and pedestrian road crossings to promote access by ambulant older people, wheelchair users and mobility scooters; E. Provide adequate communal facilities, including on-site accommodation where required, for essential staff, F. Be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type. Unfortunately, some of these requirements are overly prescriptive and unnecessary and confuse the differences between types of housing for older people.

We recommend that the above list is condensed to simply say:

Housing designed to accommodate older people should be carefully considered in terms of location and design so that the end user will benefit from a form of high-quality accommodation which will address their specific needs. It is also worth highlighting that the requirement to provide 10% of dwellings for older people on sites of 50 + dwellings is unlikely to result in older persons housing of a viable scale. Allocating specific sites within the local plan in sustainable town centre or edge of town centre locations for older persons housing is likely to be more successful in delivering this typology.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

4.63. In this policy, the Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon. This will include residential care homes. The policy is in two parts.

4.64. The first suggests that development proposals of this nature will have to meet a range of criteria such as how the design addresses the health and wellbeing of older people, be within 400 metres of local facilities and shops, and be supported by a Care Needs Assessment to justify the development proposal's scale, tenure and accommodation type.

4.65. The second part of the policy states that all general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people while schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents.

4.66. Whilst the principle of providing housing for older people is supported, the policy, as currently drafted, raises a number of concerns. First, in terms of the site requirements, it applies a one-size fits all approach to proposals. It does not account for the specific characteristics and constraints of a site that may prevent it delivering homes appropriate for older and disabled people. Whilst new housing allocations will be within sustainable locations, they will not necessarily meet the specific accessibility requirements.

4.67. Accordingly, it is considered that this part of the policy should be amended to allow for greater flexibility to ensure deliverability is not impacted or, alternatively, the Council should consider specifically allocating specialist accommodation in the right

locations, rather than relying on all housing allocations to deliver specialist older person accommodation.

4.68. Secondly, it is not clear whether the policy requires the 10% of specialist older person housing to be in addition or instead of the required level of affordable housing. Given that affordable housing is not mentioned, it is presumed that this is in addition to affordable housing. On this basis, for a site such as Land to the South of Littleham, this would mean a requirement to provide 40% of the housing as specialist or non-market. This, of course, raises concerns regarding site viability, particularly, on larger sites such as the Land to the South of Littleham that will have to provide strategic infrastructure such as SANGs.

4.69. On this basis, the requirement to provide for at least 10% as on-site as specialist older person dwellings is subject to commercial viability is welcomed. However, the policy, in terms of its second part, would, in addition to this, benefit from significant re-drafting to clarify and confirm the Local Planning Authority's approach.

4.70. The requirement to provide 10% specialist housing in addition to 30% affordable housing on schemes such as Land to the South of Littleham is prohibitive and will only result in additional costs to both the Local Planning Authority and the applicant as both parties will have to consider the viability matters. This is because there is a significant extra cost with specialist housing given their additional requirements relating to access, need for communal facilities and additional parking requirements for essential staff.

4.71. Furthermore, the Council's approach does not reflect the requirement of large sites to provide for a mix of house types across a range of houses sizes. It is felt that due to the scale and opportunities to introduce a variety of styles that large residential styles will provide for housing that meets the needs of older people, particularly, when considering the requirement for M4 (2) and M4 (3) housing as part of the Building Regulations. The additional requirement, as set out by this policy, is unnecessary and will leave to additional costs during the planning process.

4.72. Bloor Homes object to this policy.

4.73. As currently worded the policy is not effective or justified and therefore not sound as it will lead to a lack of clarity for the decision maker and applicants. It is considered that the policy is too specific in its requirements to meet older persons housing whilst the requirement to provide such housing in addition to affordable housing purposes raises significant viability issues than will only increase costs to the Local Planning Authority and applicants as they are sought to be addressed through the application process.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4.74. Further clarification is required within the drafting of the policy or, alternatively, the Council should consider specifically allocating specialist accommodation in the right locations, rather than relying on all housing allocations to deliver specialist older person accommodation.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy HN03 and others

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please see Supporting Statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Please see Supporting Statement

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

Full name: Mike Allen

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Policies HN03 and HON4 require careful review in the LP regarding market housing, rentals, and affordable homes for all ages and abilities, while adhering to NPPF guidelines. While young people are not the only victims of the housing shortage in Britain, they are some of the most severely affected. Reduced home ownership rates, increased rent prices and living with parents all impact a young person's employment opportunities and chances of starting a family. A key policy challenge is therefore to improve the suitability and availability of housing for young people, with studies pointing towards two specific areas of improvement. First, a healthier housing-for-rent policy must be developed that provides for both young people's housing needs and meets the demands of landlords. Second, policy makers, landlords and house-builders need to offer housing which is better suited to the growing phenomenon of shared accommodation among younger adults These planned 3-bedroom larger homes are beyond the reach of first-time buyers, In contrast, the well-being of older adults and those with disabilities has been neglected by our local planning policy. Policy HN03 is too restrictive since it limits such housing to within 400 meters walking distance of local facilities and shops. This policy really only applies to sheltered housing for the frail. HN03 policy as it stands is ageist. Older people use cars and internet just as much as younger adults. Programmatic, and clinical interventions prove the need for good housing is an important social determinant of older adult function and quality-of-life. There is a key health issue here: extending life expectancy means housing wealth increasingly funds longer periods in retirement and ill-health. Any lack of such assets produces disadvantage within our current social welfare system. Poor housing and inadequate resources for home-care are associated with more hospitalisations, nursing home admissions, and earlier mortality. The National Health and Aging Trends Study shows half of community-living older adults with low- and moderate-incomes have a self-care, household, or mobility disability. Housing characteristics for the old and young and disabled, is a domain that has previously been neglected in discussions at Strategic Planning Committee level and consequently in our Local Plan. A change of required housing and specifications would help address this deficit. There is an aspect of the LP influence on our EDDC housing

market which we can use to advantage to meet the real needs of our residents: Where people over 55 are looking to release equity and move to smaller homes, there has been little progress in improving housing options for older people. For such house-movers, health, and family issues become more important with age, and financial reasons are least important. So we should avoid framing the housing shortage as just an issue of affordability or an intergenerational war where the young can prosper only by triumphing over the old. (see Housing needs of young people 2024 report House of Lords Library). By providing more smaller homes would help “downsizers” move into a nearby and smaller home in their own neighbourhood. This would mean that people will retain their social and health community support networks, yet houses will be released for the families which need them. When it comes to facilities, both young and old now need internet connections as much as they need electricity and water. Telehealth services are becoming a key way of developing home welfare, access to work and welfare electronically. Systems now allow health and care professionals to monitor and communicate with people in their own homes and for people to manage their own health conditions using remote technology. Smart technology and meters that allow individuals to review or control energy consumption, heating and security; and home sensors to monitor and provide information about the condition of homes, such as damp or carbon monoxide, will improve health issues. Since 1990 Rates of building specialised housing have declined, leading to fewer opportunities for older people to choose. Building smaller, smarter and energy efficient market, affordable and social homes for older people would reduce demand on health and care services, but will require homes that support new technologies and are safe, accessible and adaptable. All homes will need to adapt to accommodate new technologies and have sufficient space for care provision. For example, telecare applications will need sufficiently high speed Internet to work. (DCLG analysis) In regard of Social housing needs: poverty rates in England are typically higher amongst households containing disabled people. Half the households in poverty have a disabled family member, yet only 5% of homes have the required features needed for disabled access. This LP intends that deficit to continue. Yet of the remaining 95% of homes, more than half would require internal structural or major alterations to make them suitable for frail or disabled people. Nationally 26% of people have a disability, and in Devon it is 29.5% (JSNA 2018) yet it’s estimated that less than 6% of the national housing supply is designed to be accessible. ESA claimants in the EDDC area numbered 3490 at December 2021 of 149100 in the population. Levels of dementia diagnosis in Devon highlight a potential gap of unmet need where 2 in 5 people aged 65 and over are estimated to have dementia but are undiagnosed (JSNA 2021) It seems that our plans that only 5% of new homes have M4(3) standards is sadly inadequate. The desire to age in place reflects the importance of maintaining social connections that are linked to the home’s location. Moving had a small but significant negative effect on health status among older adults, even when they were relocating to a location that offered more support. There is a need to combine

a traditional spatial focus on home, housing, and neighbourhood with an intersectional one that is focused in age and disability(see McKee et.al. 2024) This needs-based policy area affects many aspects of EDDC Housing provision. It seemed right and very important, to have housing/ welfare/ public health and Planning Policy views integrated with experiences from Planning officer views to see how more granular specifications can be introduced into either policy HN03 and Policy HN04, to specify our approach to meeting the real needs of all ages and abilities in East Devon. We have historically encountered weaknesses in the standards of housing design policy especially in regard to minimum sizes of house rooms and accessibility The NPPF has specified a need to look closely at the density and efficient use of Land, and these suggestions will improve our compliance with this policy. Therefore a review of our Local Plan policies on types of housing is essential to ensure new housing is suitable for each population segment. At present HN03 is just focused on residential care and nursing homes or sheltered accommodation rather than spelling out clear standards for young, old or disabled in general market housing (which is only a passing mention in HN03) While the acute needs of housing accommodation seekers are put as low as 200+ in East Devon, this figure does not necessarily reflect the needs of single people and young families living in parent's homes. In addition, the increasing need for more frail older people to move to sheltered or similar accommodation needs to be firmly anchored in clear policy interpretation. The NPPG chapter on Health and Wellbeing seeks neighbourhoods where healthy and active lifestyles can be enjoyed by both young and old. It specifically states that the Government supports: "the creation of healthy living environments for people of all ages which supports social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments." The Government has encouraged an integrated policy to public healthcare. Joint Strategic Needs Assessments, Health and Wellbeing Board, and other local health and adult social care commissioning reports and documents have provided useful background data. But these have not been reviewed by the Strategic Planning Committee. The local need and future areas for investment with regard to older people and the young is clear. Unfortunately the East Devon District Council approach is not compliant with this Integration policy if it does not take account of the housing design and neighbourhood facilities needed for frail older people and disabled. A focus on sheltered and institutional accommodation is there, but it does not specify sufficient housing with wheelchair accessibility, nor local leisure facilities such as benches for people who cannot walk far. Consequently there is less opportunity to encourage healthy walking. During the development of the previous and current Local Plan, studies were done and made public about different needs at different ages in our population. These do not appear in the evidence base. Yet the Council has extensive information from the poverty working group. Should we now bring in more radical policies for creating affordable small homes? Should we promote single-story homes even though

the NPPF emphasises density? Is it necessary to strengthen age diversity within housing standards policies? I am hopeful that the results of a review of the Regulation 19 Plan by Officers and Members will resolve these issues.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Strategic Planning Committee should change HN04 to require 30% of new homes to meet M4(3) requirements for wheelchair accessible dwellings not 5% because this lower target does not improve on the present inadequate national and local level.

Full name: Devon Wildlife Trust (planning)

Organisation (where relevant): Devon Wildlife Trust

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Access to nature is important for people at all stages of their life.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reference is needed to the requirement for provision of areas where older people are able to access the natural environment.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation (HBF)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 91. HBF suggest this policy needs to be updated to reflect the range of innovations in this sector, and as mentioned above we have concerned about the lack of evidence of viability, and the additional costs and additional regulation which are impacting on the viability and deliverability of new hosing, includ-ing that for older people.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: There is a conflict with this well-meaning policy for the provision of care homes (C2) or older people dwellings (C3) in that there is no requirement for these to be affordable. The majority of new care homes are for the top end price bracket where local people cannot afford to go. The difference in care home prices range from £800 to £2,000 per week with the state offer only being accommodated in those at the lower end of the scale. There is a genuine need for some of the affordable provision to be provided in the care home (C2) category. Conversely, there is also a need for open-market housing for older people wanting to down-size from a 4-bed property to (say) a 2-bed one, meaning that the need is for more small properties than just those for first-time buyers.

Full name: Kerry Kennell

Organisation (where relevant): Ottery St Mary Town Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN03

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: P131 8.5 Not applicable to Ottery. New estates will be accessible but what about the existing town centre, particularly those in the conservation area?

HN04

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The “subject to site suitability and viability” is noted but this policy will often not be able to be complied with and so it will routinely delay or even stop developments. It is accepted that provision needs to be made as part of developments for people with specific needs but the extent of this requirement will regularly become something that is not able to be delivered.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Needs further consideration

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Vistry support the principle of Strategic Policy HN04 and acknowledges that new homes should provide quality living environments for residents both now and in the future.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: However, we believe that there should be more emphasis on flexibility and viability which should be factored into the proposed policy text.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To be considered justified, the policy text should provide more detail with regards to the Site suitability and viability considerations.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

3.4 Policy HN04 requires that all new homes meet specific accessibility standards from Building Regulations Approved Document M. The requirements set out as part of the policy are as follows:

- 100% of new homes meeting M42(2) standards for accessibility and adaptability;

- 100% of new specialist accommodation for older people meeting M4(3) wheelchair user standards; and

- At least 5% of affordable housing for rent and homeownership to meet wheelchair adaptable or user standards.

3.5 We support that the policy gives recognition to site requirements/typology and viability, however, further consideration to viability of the requirements should be given.

3.6 The criterion requires for 100% of new homes to meet the requirements for accessible and adaptable homes under Part M42(2) of Building Regulations. It is noted that the Council's evidence base allows for an additional £1,400 per dwelling in build costs to meet the M4(2) requirements. Taylor Wimpey considers that that this cost should be increased to at least £2,000 per dwelling. As drafted the policy is unjustified and unsound. It is recommended that the Council's evidence base is amended to reflect a more robust figure to ensure the effectiveness of the policy in the adoption of this higher accessibility standard.

3.7 The second criterion requires that 100% of new specialist accommodation for older people must meet the requirements of M4(3) wheelchair user standards of Building Regulations. The Council's evidence base suggests that an additional £138/sq.m is sufficient to meet the costs of the M4(3) requirements. It is considered that the cost is insufficient to allow for these additional requirements and therefore that the evidence base be amended to reflect a more robust cost base.

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns.

As a starting point any higher standards must be evidenced, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility.

100% delivery of M4 (2) This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

- Many sites in the district do not have suitable topography to fully meet the M4(2) standards.
- M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing space for street trees/landscaping The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS, significantly increase the built footprint of each unit thereby reducing development numbers and density.

- For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens.

Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.

5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b) The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced.

If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or(b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.

Viability: It is not clear whether or not the cost allowances for M4(2) and M4(3) set out within the Three Dragons Viability Assessment allow only for the internal costs associated with the homes or also take account of the additional levelling / retaining wall works that would be involved in providing the required level access on uneven sites, which can be significant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement (e.g. 30%) for M4 (2) dwellings would be more acceptable and reasonable. Flats, 1 bed units, and self and custom build plots should be excluded entirely. M4 (3) only where up to date evidence of need.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns.

As a starting point any higher standards needs to be evidence, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility.

100% DELIVERY OF M4 (2)

This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

• Many sites in the district do not have suitable topography to fully meet the M4(2) standards.

• M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing space for street trees/landscaping The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density.

• For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens.

Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.

5% AFFORDABLE RENT M4 (3) (A) OR HOMEOWNERSHIP M4 (3) (A) or (B)

The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced.

If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or(b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.

VIABILITY

Regarding the Three Dragons Viability Assessment do the additional costings allowed for M4(2) and M4(3) just address internal costs or do these costs take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable.

Flats, 1 bed units, and self and custom build plots should be excluded entirely.

M4 (3) only where up to date evidence of need.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns.

As a starting point any higher standards needs to be evidence, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility.

100% delivery of M4 (2)

This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

• Many sites in the district do not have suitable topography to fully meet the M4(2) standards.

• M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing

space for street trees/landscaping The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density.

• For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens.

Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.

5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b)

The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced.

If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or(b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.

Viability

Regarding the Three Dragons Viability Assessment it is not clear as to whether the additional costings allowed for M4(2) and M4(3) just address internal costs or also take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites, which can be significant.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement (e.g. 30%) for M4 (2) dwellings would be more acceptable and reasonable.

Flats, 1 bed units, and self and custom build plots should be excluded entirely.

M4 (3) only where up to date evidence of need.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns. As a starting point any higher standards needs to be evidence, the implications in terms of scheme

deliverability and viability need to be properly tested and understood, and there needs to be flexibility. 100% delivery of M4 (2) This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

- Many sites in the district do not have suitable topography to fully meet the M4(2) standards.

- M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing space for street trees/landscaping The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density.

- For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens. Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.

5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b)

The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced.

If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or(b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed. Viability Regarding the Three Dragons Viability Assessment do the additional costings allowed for M4(2) and M4(3) just address internal costs or do these costs take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable. Flats, 1 bed units, and self and custom build plots should be excluded entirely. M4 (3) only where up to date evidence of need.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): DAAB Partnership

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns.

As a starting point any higher standards needs to be evidence, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility.

100% DELIVERY OF M4 (2)

This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

• Many sites in the district do not have suitable topography to fully meet the M4(2) standards.

• M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing

space for street trees/landscaping The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density.

• For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens.

Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.

5% AFFORDABLE RENT M4 (3) (A) OR HOMEOWNERSHIP M4 (A) OR (B)

The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced. If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or (b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.

VIABILITY

Regarding the Three Dragons Viability Assessment is it not clear if the additional costings allowed for M4(2) and M4(3) just address internal costs or if these costs take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put

forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable.

Flats, 1 bed units, and self and custom build plots should be excluded entirely.

M4 (3) only where up to date evidence of need.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Obsidian Strategic Asset Management

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns.

As a starting point any higher standards needs to be evidenced, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility.

100% delivery of M4 (2)

This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

• Many sites in the district including Honi_18, do not have suitable topography to fully meet the M4(2) standards.

• M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing

space for street trees/landscaping. The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density.

• For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens.

Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home.

5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b)

The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced.

If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or(b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.

VIABILITY

Regarding the Three Dragons Viability Assessment do the additional costings allowed for M4(2) _and M4(3) just address internal costs or do these costs take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable.

Flats, 1 bed units, and self and custom build plots should be excluded entirely.

M4 (3) only where up to date evidence of need.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Cavanna Homes (Cavanna)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns. As a starting point any higher standards needs to be evidence, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility. 100% delivery of M4 (2) This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

•Many sites in the district do not have suitable topography to fully meet the M4(2) standards.

•M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide),has a potentially significant cumulative effect on developable areas affecting site yield and/orstreet scene quality by increasing hard surfacing and reducing space for street trees/landscaping.

•The additional circulation space required for M4(2) units will, together with the internal roomrequirements of NDSS (discussed under Strategic Policy DS01), significantly increase the builtfootprint of each unit thereby reducing development numbers and density.

•M4 (2) also causes significant difficulties on 1 bed maisonettes where the principal entrance is ona different level from the main living accommodation.
www.carneysweeney.co.uk

• For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens. Further mandating M4 (2) standards on

self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home. 5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b) The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced. If such accommodation is to be provided there is strong preference for M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or (b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable. Flats, 1 bed units, and self and custom build plots should be excluded entirely. M4 (3) only where up to date evidence of need/demand.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The aim of increasing accessible and adaptable housing is supported and the reference to site suitability and site viability is welcomed but the mandated standards set out in the policy raise serious concerns. www.carneysweeney.co.uk As a starting point any higher standards needs to be evidence, the implications in terms of scheme deliverability and viability need to be properly tested and understood, and there needs to be flexibility. 100% delivery of M4 (2) This proposal is of significant concern in terms of the implications for site yield, viability, and site suitability:

• Many sites in the district do not have suitable topography to fully meet the M4(2) standards.

• M4 (2) external parking standards, due to the additional space requirements (up to 3.3m wide), has a potentially significant cumulative effect on developable areas affecting site yield and/or street scene quality by increasing hard surfacing and reducing space for street trees/landscaping The additional circulation space required for M4(2) units will, together with the internal room requirements of NDSS (discussed under Strategic Policy DS01), significantly increase the built footprint of each unit thereby reducing development numbers and density.

• For flat blocks this will require lifts which for occupiers and in particular RP's would cause additional maintenance costs burdens. Further mandating M4 (2) standards on self and custom build plots (discussed further below) would go against the essence of allowing people to design and build their own bespoke home. 5% affordable rent M4 (3) (a) or homeownership M4 (3) (a) or (b) The provision of a smaller percentage to M4(3) is not as much of a concern, although it is considered any such accommodation should be evidenced. If such accommodation is to be provided there is strong preference for

M4 (3) (a) wheelchair adaptable which can be suitable for all occupiers giving maximum flexibility whereas the specific internal requirements of M4 (3) (b) wheelchair dwellings (for example internal cabinet and worktop heights) is not really suitable for a non-wheelchair user. Provision of affordable M4 (3) (a) or (b) units should be informed by the needs evidence noting that for some wheelchair users often a more bespoke design can be needed. Viability With regard to the Three Dragons Viability Assessment while the estimated additional costs for M4(3) appear accurate, the additional costs for M4(2) are disputed – the Viability Assessment gives an additional cost of £1,400 per unit but Taylor Wimpey assert this should be £2,0000 per unit. It is also unclear if these additional costings are just based on the internal costs for the plot or do these www.carneysweeney.co.uk costs take account of additional levelling/retaining wall works that would be involved in providing level access on uneven sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A reduced percentage requirement for M4 (2) dwellings would be more acceptable and reasonable and the Viability Assessment needs to be updated for M(2) costs. Flats, 1 bed units, and self and custom build plots should be excluded entirely. M4(3) only where up to date evidence of need.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Jozie Bannister

Organisation (where relevant): Devonshire Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: The requirement for all new housing to meet M4(2) is completely unjustified, not necessary and will remove access to housing for a whole portion of the market. In increasing dwelling size requirements, purchase prices for these will have to go up and make them inaccessible to those purchasing with a smaller budget. There is a huge market for smaller homes and to expect m4(2) on 100% of dwellings will make them cost prohibitive which will have a profound, negative impact on the housing market as well as removing peoples' ability to purchase their own home.

Full name: Owen Jones

Organisation (where relevant): LRM Planning

Other party name (if relevant): David Wilson Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: PO LIC Y HN0 4 – A CC ES SIB LE A ND AD AP TA BLE HOU SI NG

9.39 The PPG states29 that local planning authorities should set out how they intend to approach demonstrating the need for M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings). It suggests a range of factors which should be taken into account, and which include: ? the likely future need for housing for older and disabled people (including wheelchair user dwellings); ? the size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); ? the accessibility and adaptability of existing housing stock; ? how needs vary across different housing tenures; and ? the overall impact on viability.

9.40 The evidence base supporting the Plan30 suggests that the minimum combined need for both Category M4(2) and M4(3) housing, having regard to the accessibility and adaptability of the existing housing stock, would be: ? affordable housing – 1,047 dwellings; and ? market housing – 4,072 dwellings. ? Total = 5,119 dwellings.

9.41 The maximum need was identified as being 12,959 dwellings. 28 MHCLG, Planning Practice Guidance, Housing: optional technical standards , Paragraph: 015 Reference ID: 56-015-20150327 29 MHCLG, Planning Practice Guidance, Housing: optional technical standards , Paragraph: 007 Reference ID: 56-007-20150327 30 ORS , Local Housing Needs Assessment (2022), para. 8.5. EAST DEVON LOCAL PLAN PUBLICATION DRAFT CONSULTATION 52

9.42 On the basis of these conclusions, the Local Housing Needs Assessment confirms that “East Devon should plan for a minimum of 30% of the LHN to be both M4(2) Category 2 or M4(3) Category 3 housing31.”

9.43 However, as drafted, the emerging Local Plan seeks all new dwellings to meet Category M4(2) Building Regulation standards, with additional M4(3) (a) and/or (b) requirements for specialist accommodation for older people, affordable housing for rent and affordable housing for homeownership.

9.44 Assuming that the housing requirement was met in full, then over the plan period, a total of 20,909 homes would be delivered as either M4(2) or (3) dwellings. This is a significantly higher quantum of accessible and adaptable dwellings and wheelchair user dwellings than the evidence suggests is necessary.

9.45 Consequently, the Plan is seeking the provision of a significantly greater proportion of accessible and adaptable homes and wheelchair adaptable and wheelchair user dwellings than the evidence suggests is necessary. This is not a justified proposition.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: PO LIC Y HN0 4 – A CC ES SIB LE A ND AD AP TA BLE HOU SI NG

9.39 The PPG states29 that local planning authorities should set out how they intend to approach demonstrating the need for M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings). It suggests a range of factors which should be taken into account, and which include: ? the likely future need for housing for older and disabled people (including wheelchair user dwellings); ? the size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes); ? the accessibility and adaptability of existing housing stock; ? how needs vary across different housing tenures; and ? the overall impact on viability.

9.40 The evidence base supporting the Plan30 suggests that the minimum combined need for both Category M4(2) and M4(3) housing, having regard to the accessibility and adaptability of the existing housing stock, would be: ? affordable housing – 1,047 dwellings; and ? market housing – 4,072 dwellings. ? Total = 5,119 dwellings.

9.41 The maximum need was identified as being 12,959 dwellings. 28 MHCLG, Planning Practice Guidance, Housing: optional technical standards , Paragraph: 015 Reference ID: 56-015-20150327 29 MHCLG, Planning Practice Guidance, Housing: optional

technical standards , Paragraph: 007 Reference ID: 56-007-20150327 30 ORS , Local Housing Needs Assessment (2022), para. 8.5. EAST DEVON LOCAL PLAN PUBLICATION DRAFT CONSULTATION 52

9.42 On the basis of these conclusions, the Local Housing Needs Assessment confirms that "East Devon should plan for a minimum of 30% of the LHN to be both M4(2) Category 2 or M4(3) Category 3 housing31."

9.43 However, as drafted, the emerging Local Plan seeks all new dwellings to meet Category M4(2) Building Regulation standards, with additional M4(3) (a) and/or (b) requirements for specialist accommodation for older people, affordable housing for rent and affordable housing for homeownership.

9.44 Assuming that the housing requirement was met in full, then over the plan period, a total of 20,909 homes would be delivered as either M4(2) or (3) dwellings. This is a significantly higher quantum of accessible and adaptable dwellings and wheelchair user dwellings than the evidence suggests is necessary.

9.45 Consequently, the Plan is seeking the provision of a significantly greater proportion of accessible and adaptable homes and wheelchair adaptable and wheelchair user dwellings than the evidence suggests is necessary. This is not a justified proposition.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The PPG states [MHCLG, Planning Practice Guidance, Housing: optional technical standards , Paragraph: 007 Reference ID: 56-007-20150327] that local planning authorities should set out how they intend to approach demonstrating the need for M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings). It suggests a range of factors which should be taken into account, and which include:

the likely future need for housing for older and disabled people (including wheelchair user dwellings);

size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);

the accessibility and adaptability of existing housing stock;

how needs vary across different housing tenures; and

the overall impact on viability.

The evidence base supporting the Plan [ORS, Local Housing Needs Assessment (2022), para. 8.5.] suggests that the minimum combined need for both Category M4(2) and M4(3) housing, having regard to the accessibility and adaptability of the existing housing stock, would be:

affordable housing – 1,047 dwellings; and

market housing – 4,072 dwellings.

total = 5,119 dwellings.

The maximum need was identified as being 12,959 dwellings.

On the basis of these conclusions, the Local Housing Needs Assessment confirms that "East Devon should plan for a minimum of 30% of the LHN to be both M4(2) Category 2 or M4(3) Category 3 housing [Para. 7.43]."

However, as drafted, the emerging Local Plan seeks all new dwellings to meet Category M4(2) Building Regulation standards, with additional M4(3) (a) and/or (b) requirements for specialist accommodation for older people, affordable housing for rent and affordable housing for homeownership.

Assuming that the housing requirement was met in full, then over the plan period, a total of 20,909 homes would be delivered as either M4(2) or (3) dwellings. This is a significantly higher quantum of accessible and adaptable dwellings and wheelchair user dwellings than the evidence suggests is necessary.

Consequently, the Plan is seeking the provision of a significantly greater proportion of accessible and adaptable homes and wheelchair adaptable and wheelchair user dwellings than the evidence suggests is necessary. This is not a justified proposition.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The PPG states [MHCLG, Planning Practice Guidance, Housing: optional technical standards , Paragraph: 007 Reference ID: 56-007-20150327] that local planning authorities should set out how they intend to approach demonstrating the need for M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings). It suggests a range of factors which should be taken into account, and which include:

the likely future need for housing for older and disabled people (including wheelchair user dwellings);

size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);

the accessibility and adaptability of existing housing stock;

how needs vary across different housing tenures; and

the overall impact on viability.

The evidence base supporting the Plan [ORS, Local Housing Needs Assessment (2022), para. 8.5.] suggests that the minimum combined need for both Category M4(2) and M4(3) housing, having regard to the accessibility and adaptability of the existing housing stock, would be:

affordable housing – 1,047 dwellings; and

market housing – 4,072 dwellings.

total = 5,119 dwellings.

The maximum need was identified as being 12,959 dwellings.

On the basis of these conclusions, the Local Housing Needs Assessment confirms that "East Devon should plan for a minimum of 30% of the LHN to be both M4(2) Category 2 or M4(3) Category 3 housing [Para. 7.43]."

However, as drafted, the emerging Local Plan seeks all new dwellings to meet Category M4(2) Building Regulation standards, with additional M4(3) (a) and/or (b) requirements for specialist accommodation for older people, affordable housing for rent and affordable housing for homeownership.

Assuming that the housing requirement was met in full, then over the plan period, a total of 20,909 homes would be delivered as either M4(2) or (3) dwellings. This is a significantly higher quantum of accessible and adaptable dwellings and wheelchair user dwellings than the evidence suggests is necessary.

Consequently, the Plan is seeking the provision of a significantly greater proportion of accessible and adaptable homes and wheelchair adaptable and wheelchair user dwellings than the evidence suggests is necessary. This is not a justified proposition.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: I support this policy with one exception – the requirement that 100% of all new dwellings will meet building regulation M4(2) requirements which is optional under the building regulations. This requirement is subject to "site sustainability and site viability". However, this should be an aim and stated goal rather than a requirement which is subject to viability. New development should comply with the current building regulations and other similar requirements. This requirement is, however, far too onerous and unrealistic on 100% of all new dwellings., considering too that developments must meet many other requirements such as BNG which can compromise the financial viability of schemes.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Damien Lynch

Organisation (where relevant): Planning Issues

Other party name (if relevant): Churchill Living and McCarthy Stone

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The draft policy states that

B. 700% of all new specialist accommodation for older people will meet regulation M4 (3) requirements (a) or (b) (wheelchair user dwellings); C 700% of new specialist accommodation for older people will meet regulation M4 (3) (2) (b) requirements (wheelchair accessible dwellings) for those dwellings where the local authority is responsible for allocating or nominating a person to live in a dwelling; We suggest that the council clarify this position in respect of point B above which presumably should be M4 (2) Although the plan wide viability study states that it has tested to M4(3) for older persons housing, no adjustments are made for the larger units required to meet this fully wheelchair accessible standard. To provide all units to full M4(3) standard would in our experience, reduce the number of units deliverable by 10-15 units. The testing undertaken by the council's viability consultant is not in our view robust on this point and must be updated to reflect this consideration. As set out at Regulation 18 stage Footnote 49 of the Framework clearly sets out that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.

Paragraph 002 (Reference ID 56-002-20160519) of the Planning Practice Guidance (PPG) reiterates that local planning authorities have the option to set additional technical requirements for accessibility and adaptability, however, they will need to gather evidence to determine whether there is a need for additional standards in their

area, and justify setting appropriate policies in their Local Plans. The supporting text for this policy advises that

8.43 M4(3) Category 3 Category 3 wheelchair users housing Based on gross modelled need, the ORS study forecasts a net additional 7,070 households over the plan period in East Devon will need wheelchair adapted housing. This equates to about 6% of the local housing need The 5,779 net adapted need housing already encompasses households counted as having a health problems or disability that affects their housing need That figure already includes households with wheelchair users so the latter should not be double counted. There's also a very significant overlap between wheelchair users housing need and the forecast additional 6,224 specialist older persons housing need The study concludes that it may be appropriate to adopt a target of 700% wheelchair accessible housing This could reduce the proportion of general needs housing that would need to meet the M4(3) Category 3 requirements

The East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment by OBR (Sept 2022) provides the following justification for 100% of specialist older persons' housing to be built to M4(3).

7.56 Whilst not all over 75 households needing wheelchair adapted housing will live in specialist older person housing, it is likely that at least a tenth of those moving to specialist older housing will need wheelchair adapted homes. It is also likely that some older households will progress to using a wheelchair whilst living in specialist housing due to a deterioration in their health. Considering that a given older persons residence may house multiple residents in its lifetime, it becomes even more likely that at some stage a resident requires a wheelchair. Furthermore, it may be noted that where it is possible to retrospectively adapt residences, this may be costly or difficult.

7.57 On this basis it may be appropriate to adopt a target of 100% wheelchair accessibility (where viable) for specialist accommodation for older people to avoid potential inequality of provision. This could also reduce the proportion of general needs housing that would need to meet the M4(3) Category 3 requirements. The respondents consider the justification for a 100% M4(3) requirement for wheelchair adaptions is predicated on several flawed assumptions. In the first instance, the rationale that 9.3% of households where the representative was 85 years and older require a wheelchair does not mean that a tenth of those moving into specialist older persons' housing,

particularly specialist housing for the active elderly, will require wheelchair accessible housing.

Churchill Retirement Living have been building retirement living apartments since 1994 and have accrued significant expertise in building specialist housing that enables older people to live independently Recent research into existing Churchill Retirement Living developments has resoundingly demonstrated that there is no need for our apartments to meet M4(3) requirements with less than 1% of our occupiers using a wheelchair full time.

Factors that contribute to the low-level of wheelchair need for retirement living housing are that long-term or lifetime wheelchair users will have moved into suitably adapted homes earlier in their lives and are more likely to remain in these homes. Individuals who move into a retirement living apartment but then require a wheelchair in the short-term due to a bout of illness or a physical injury, can do so in a home built to M4(2) as rooms and circulation space can accommodate a wheelchair. Individuals who progress to needing a wheelchair permanently, do so as a result of serious illness or Injury in which case specialist accommodation with a greater degree of care, such as a residential care or nursing home is more likely to be appropriate. People with long term mobility disabilities would be in a different setting and as such would not occupy an independent living retirement development. Given the lack of demand for the requirement for M4(3) in this form of accommodation it would simply be a cost to development and ultimately an increased purchase cost whilst serving no identified need.

Building to M4(2) provides sufficient accessibility and adaptability for all our current users and future users and is very much in keeping with the product of providing an independent retirement living lifestyle for those aged 60 and over. Additionally, Paragraph 009 (Reference ID: 56-009-20750327) of the PPG sets out that local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

There is no policy requirement or control that the LPA can impose over open market private apartments that could mandate that they must be sold to a wheelchair user. To that end, I refer the Council to Paragraph 67-69 of the attached appeal decision at Stanford Hill, Lymington (APP/ B1740/W/20/3265937). This sets out a view on Optional

Technical Standards and in particular a Local Plan policy requirement for 100% of specialist older persons' accommodation to be built to M4(3) dwellings, with the Appeal Inspector concluding:

I am mindful also that the design of the appeal scheme seeks to achieve the M4(2) Optional Building Regulations standard for accessible and adaptable dwellings - albeit that without a condition specifying this, I accept that the Council could not enforce this standard In any event, the proposed development would cater for a range of occupants, and not only those with impaired mobility Consequently, I am not persuaded that a requirement for the higher optional standards to be deployed in all of the proposed dwellings would be either reasonable or necessary in this case. It is clear from this decision that, despite having an adopted policy, the Inspector considered the provision of M4(2) sufficient to cater for a range of occupants and that this technical breach of the policy was not so significant to outweigh the very significant benefits of the scheme. We are aware that a small number of emerging and adopted Local Plans have introduced policies requiring 100% of specialist older persons' accommodation to be built to M4(3) There may, accordingly, be the mistaken assumption that such policies constitute best practice however for the reasons set out in this representation, we strongly advise the Council that this is not the case. The specialist older persons' housing sector is increasingly challenging such policies at Examination in Public and, in the rare instances they have been adopted, at Appeal. Finally, we would respect fully remind the Council that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002- 20190509). Considering the above I would respectfully advise that imposing a 100% M4(3) requirement for all specialist older persons' housing would not meet the tests of soundness in the NPPF accordingly

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: We therefore recommend that officers engage with us on this very important point. If such a policy was adopted in the plan, no older persons housing schemes will come forward in East Devon over the plan period. We have

recently engaged in a Local Plan EiP in Sheffield where officers reduced their 100% requirement to 5% on the basis of the evidence Notwithstanding the requirements to retest viability and without making the adjustments as required above, the viability evidence does not demonstrate this requirement is viable. We recommend that the policy is amended as follows: B. 5% of all new specialist accommodation for older people will meet regulation /114 (3) requirements (a) or (b) (wheelchair user dwellings); We would like to engage with officers on this very important issue to ensure a workable policy is brought forward.

Full name: Neal Jillings

Organisation (where relevant): Summerfield Homes Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The requirement for 100% of new housing to be at least Part M(2) compliant is justified in supporting text in that it 'aligns' with the Government's approach. We support and understand the need for some new housing to be as accessible and adaptable as possible. It is disingenuous for the supporting text to state that this policy requirement aligns with the Government's aspirations. The Building Regulations refer to Part M(2) as optional. Footnote 51 of the NPPF refers to the optional standards, 'where this would address an identified need for such properties'. We are not aware of evidence suggesting that all new dwellings necessarily need to be Part M(2) compliant. The sole evidence appears to be the assumption that the requirement for all new dwellings to be Part M(2) compliant 'aligns' with the Government's approach. We query this and highlight that Part M(2) is 'optional' which policy HN04 ignores.

Having said the above, which relates to the principle of this policy requirement, we consider that the draft policy wording is flawed in that its one size fits all is inappropriate. There is a greater ability for larger dwellings (3 bed and above) to incorporate the requirements of Part M(2). The effect on 1 and 2 bed units is disproportionate where standard sizes for certain elements are more difficult to easily incorporate. Anecdotally, Building Regulations may look to reflect this fact. An absolute requirement for all units, including those smaller sizes, may have the unintended consequence of reducing the supply of smaller dwellings.

If there is no evidence to justify the imposition of the draft target for Part M(2) across all dwellings, then it should not be imposed. There is a potential consequential impact on

delivery of housing. The increase in build costs is unlikely to be offset by a increased sales values.

The 2021 document 'Research into Access to and Use of Buildings' (January 2021 Ministry of Housing, Communities and Local Government) concludes that 'there is a significant body of qualitative evidence of benefits to individuals from living in accessible housing, but robust quantitative evidence establishing how frequently these benefits are derived from building to higher standards of accessibility are lacking to enable accurate assessment of overall social benefits at a national level'.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The requirement relating to Part M(2) compliance should be reviewed to take into account whether there is an identified local need for all new dwellings to be compliant and also review the impact on delivery.

Full name: Nathan Price

Organisation (where relevant): Tetlow King Planning

Other party name (if relevant): South West Housing Association Planning Consortium

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN04 identifies the Council's requirements for new residential development, subject to site suitability and viability, with respect to accessible and adaptable accommodation. It outlines that 100% of all new dwellings are to meet building regulation M4(2) requirements; at least 5% of new dwellings for affordable rent are to meet building regulation M4(3)(2)(a) requirements (wheelchair adaptable); and at least 5% of all new dwellings for affordable homeownership are to meet M4(3)(2)(a or b). We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we reiterate to the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon. Draft Policy HN04 goes on to state that with respect to M4(3) (wheelchair user housing) discussion with the Council should occur at an early stage to establish the most up-to-date information with respect to the level of local need. The SWHAPC agrees with this approach and that such requirements should be based on actual need rather than a blanket percentage requirement, considering viability and feasibility considerations.

Full name: Nathan Price

Organisation (where relevant): Tetlow King Planning

Other party name (if relevant): South West Housing Association Planning Consortium

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Tetlow King Planning as an agent on behalf of the South West Housing Association Planning Consortium (SWHAPC)

Draft Policy HN04 identifies the Council's requirements for new residential development, subject to site suitability and viability, with respect to accessible and adaptable accommodation. It outlines that 100% of all new dwellings are to meet building regulation M4(2) requirements; at least 5% of new dwellings for affordable rent are to meet building regulation M4(3)(2)(a) requirements (wheelchair adaptable); and at least 5% of all new dwellings for affordable homeownership are to meet M4(3)(2)(a or b). We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we reiterate to the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon.

Draft Policy HN04 goes on to state that with respect to M4(3) (wheelchair user housing) discussion with the Council should occur at an early stage to establish the most up-to-date information with respect to the level of local need. The SWHAPC agrees with this approach and that such requirements should be based on actual need rather than a blanket percentage requirement, considering viability and feasibility considerations.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Further Comments We would like the Local Plan to acknowledge further the role of Housing Associations in providing affordable housing in East Devon. It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals. Early engagement enables Housing Associations to have an 5 active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of SWHAPC members. It is recommended that the Council adds 'Collaboration with Registered Providers' to the delivery mechanisms for Policy H4 in the monitoring section of the draft Local Plan. We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people. The Council may find it insightful to know that a number of the SWHAPC Housing Associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the Local Plan to support CLTs in their choice of sites.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN04: Accessible and adaptable Housing Draft Policy HN04 identifies the Council's requirements for new residential development, subject to site suitability and viability, with respect to accessible and adaptable accommodation. It outlines that 100% of all new dwellings are to meet building regulation M4(2) requirements; at least 5% of new dwellings for affordable rent are to meet building regulation M4(3)(2)(a) requirements (wheelchair adaptable); and at least 5% of all new dwellings for affordable homeownership are to meet M4(3)(2)(a or b). We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we reiterate to the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon. Draft Policy HN04 goes on to state that with respect to M4(3) (wheelchair user housing) discussion with the Council should occur at an early stage to establish the most up-to-date information with respect to the level of local need. The SWHAPC agrees with this approach and that such requirements should be based on actual need rather than a blanket percentage requirement, considering viability and feasibility considerations

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN04 identifies the Council's requirements for new residential development, subject to site suitability and viability, with respect to accessible and adaptable accommodation. It outlines that 100% of all new dwellings are to meet building regulation M4(2) requirements; at least 5% of new dwellings for affordable rent are to meet building regulation M4(3)(2)(a) requirements (wheelchair adaptable); and at least 5% of all new dwellings for affordable homeownership are to meet M4(3)(2)(a or b). We accept that there is a growing need for properties which comply with current Building Regulations and so we support this policy direction, although we reiterate to the Council that the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon.

Draft Policy HN04 goes on to state that with respect to M4(3) (wheelchair user housing) discussion with the Council should occur at an early stage to establish the most up-to-date information with respect to the level of local need. The SWHAPC agrees with this approach and that such requirements should be based on actual need rather than a blanket percentage requirement, considering viability and feasibility considerations.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation (HBF)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN04

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or con-sistent with national policy

92. HBF do not support the need for any policies in Local Plan that repeat Building Regulations. The Building Regulation regime is separate from the planning process, and considerable changes to Build-ing Reg are underway. This is the appropriate forum for Building Regs to be reviewed.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 93. However, we do note that the requirements to meet Part M4(2) will be superseded by changes to res-idential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There therefore no need for a Local Plan policy on this issue as this issue is already adequately addressed through Building Regulations.

94. There is also a need to consider the costs of delivering the policy requiring housing to M4(2) and the requirements for accessible and adaptable dwellings policy which references M4(3). A clearly distinction needs to be made in the policy between M4(3)a wheelchair adaptable housing and M4(3)b wheelchair accessible housing. The whole plan viability assessment should be explicit on what costs it has been applying when considering M4(3)a or M4(3)b as the latter can only be sought on affordable housing where the Council has nominations and is considerably more expensive than the former. Evidence from HBF members and supported at several EIPs by housing staff from different Councils suggest M4(3)b is ten times more expensive than M(4)3a.

HN05

Full name: richard ayre

Organisation (where relevant): baker estates

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: t is noted that this is another policy requirement that cumulatively adds to the diffilculties of delivering and managing sites.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Vistry support the principle of Strategic Policy HN05 however we have concerns regarding the requirement for at least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We question whether this requirement for provision of self-build and custom build housing to be delivered on all new developments above 20 dwellings is justified. In such instances where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To ensure that the policy is justified and therefore sound, the policy text should be clarified to state that such specialised housing will be sought on new developments where there is an evidenced market demand. If there is no market demand, it should be acknowledged that units should revert back to market housing too meet local demand.

Full name: Bethan Haigh

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd. C/O Boyer

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

3.8 This policy sets out the requirements for the provision of self-build plots within new residential schemes. The policy states that on sites of 20 or more homes, 5% of those homes are required to be serviced custom or self-build plots while on larger sites (250 homes or more), a portion of plots must be designated for affordable housing with all self- build plots being completed within 3 years of purchase.

3.9 The Plan's evidence base (document 'HOU-017') which is based on 'Self-Build Demand and Supply' is out of date. This report covers the data provided for self-build need up until October 2021. This data is out of date and the policy is not robust and, therefore, unsound.

3.10 Whilst we support the aim of the policy in principle, the market demand for self-build plots needs to be reconsidered within the policy. The policy stipulates that self-build plots must be marketed for a period of 24-months before being able to revert to a 'normal' market housing. This is not considered to be reasonable. A development site may have been fully constructed and occupied within a 24-month period, and therefore the construction workers would have departed the site. It would not be reasonable for the developer to have to subsequently return to the development site to help construct a small number of self-build plots that had no demand during the 24-month marketing exercise. As a result, it will be commonplace that development sites are left with unsightly undeveloped plots of land, which often delay the provision of cycle and pedestrian connections or play facilities within the site. The marketing period within this policy should be reduced to 12-months.

3.11 It should also be noted that the developer cannot influence market demand for the self-build plots, and once the plot is sold, it is for the purchaser to obtain their own detailed planning consent. It should therefore be considered that no obligation can be placed on the developer to ensure that self-build plots are completed within 3 years of purchase, it is the role of the developer to deliver serviced plots.

Full name: Jemma Shorrock

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Persimmon Homes South West Limited

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: PHSW support Policy HN05 and welcome that it is acknowledged if plots have not been sold after 2 years of being marketed, they shall be made available for development on the open market.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Whilst point b of the proposed policy requires suitable road access to be delivered at an early stage in development, we consider that the proposed policy wording should include sufficient flexibility to ensure that appropriate triggers can be negotiated on a case-by-case basis.

Policy HN02 Also requires sites of over 250 dwellings or more to make available a proportion of plots for affordable housing, to be secured through legal agreement, subject to viability. PHSW consider this requirement should be removed from the policy text for the following reasons:

• The requirement for affordable housing will create viability and delivery constraints for developers;

• Joint working would be required with Housing Associations and third sector groups, creating a complexity and time constraint to the delivery of development;

• It must be acknowledged that Housing Associations and third sector groups may not be in a position to purchase self-build and custom build plots, and there may not be a local need for this addition;

• This requirement creates an unnecessary barrier to the delivery of homes.

Full name: Nick Guildford

Organisation (where relevant): C G Fry & Son

Other party name (if relevant): Mr & Mrs Cowling

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential scheme (defined as sites accommodating 20 or more homes) is not considered the right approach:

- Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

- If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

- If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

- Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity

impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

- Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is no requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A justified and proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is

evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C R Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

•Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

•If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

•If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

•Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished forcompletion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

•Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered.

The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required.

Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not a reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is no requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Simon Coles

Organisation (where relevant): CarneySweeney

Other party name (if relevant): C G Fry & Son Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

• Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

• Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered.

The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those

in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required.

Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not a reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is no requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): CR Down Farming Ltd and Stuart Partners Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

- Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

- If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

- If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

- Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

- Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements: B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes. C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with. Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered. The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required. Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not a reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is no requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have

identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Jess Perminter

Organisation (where relevant): CarneySweeney

Other party name (if relevant): DAAB Partnership

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

• Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

• Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered.

The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those

in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required.

Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is not requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Obsidian Strategic Asset Management

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

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• This also notes that the most popular locations for SCB demand are Exmouth, Sidmouth, Budleigh, and Ottery St Mary. As such the evidence of need does not support this generic policy approach.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

• Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered.

The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required.

Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is not requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): WainHomes (South West) Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

• Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

• Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification.

There are also concerns with the following policy requirements:

B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes.

C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with.

Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered.

The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those

in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required.

Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is not requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Cavanna Homes (Cavanna)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

• Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.
www.carneysweeney.co.uk

• Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and health and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts where a finished part of the site is then subject to further construction works. Leaving plots unfinished for completion for potentially up to 2 years

risks considerable disturbance to new residents and ongoing management for developers/management companies.

• Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification. This has been experienced in Teignbridge who have a similar policy, but most successful self builds in Teignbridge have been delivered in more rural locations rather than plots being taken up on larger scale housing estates. There are also concerns with the following policy requirements: B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes and could adversely affect sales/delivery of adjacent plots. C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with. Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered. The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 (discussed further below) which requires design codes on all major schemes or those in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required. Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not a reasonable requirement as time limits for development commencing are set in the relevant permission www.carneysweeney.co.uk and once implemented there is no requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: A better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Samantha Thomas

Organisation (where relevant): CarneySweeney

Other party name (if relevant): Taylor Wimpey Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: A set out in respect of Strategic Policy HN01: Housing to address need, imposing a mandatory percentage requirement for self and custom build (SCB) plots on larger residential schemes is not considered the right approach:

• Provision of SCB plots should be based on up to date evidenced need both in terms of numbers and location, rather than imposing a blanket requirement on all sites. The latest Self Build Demand and Supply Monitoring Report from 31/10/23 to 30/10/24 (reported to SPC on 4 February) at para 3.4 identifies that even with a noted decrease in the number of consented plots "the supply meets both the 'residual' demand from the 31/10/21-30/10/2022 (3 plots) and covers all the demand from the 31/10/2022-30/10/2023 base period (9 plots), with a surplus of 3 plots." As the identified need is being met currently without a bespoke SCB policy this does not justify the policy approach now proposed.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• If there is local demand the required plot sizes may not be in keeping with rest of the development accounting for local characteristics and density requirements.

• Delayed build out of SCB plots by private individuals / separate companies creates considerable logistic and safety issues for developers in terms of construction phasing, safety for plot occupants and established residents, and residential amenity impacts. Leaving plots unfinished for completion for potentially up to 2 years risks considerable disturbance to new residents and ongoing management for developers/management companies.

• Providing SCB plots in this way also means more creative solutions for SCB provision do not need to be pursued. It is envisaged that the majority of people wanting to build their own home will not want to be on a modern housing estate limited by plot passports or design codes (noting the requirement of this and Policy DS02). If the need is met by serviced plots on larger schemes this could stifle community led or individual schemes in other locations and stifle design and creativity which are specifically noted as benefits of SCB housing in the policy justification. www.carneysweeney.co.uk Taylor Wimpey's view is that larger sites should concentrate on delivering affordable housing, open space, community facilities, etc. which smaller schemes do not provide rather than also being asked to provide SCB plots. There are also concerns with the following policy requirements: B – This may lead SCB plots to need be delivered in early phases where road access is provided which in turn will be more visually prominent. As above visually prominent serviced plots left undeveloped for up to 2 years will have a detrimental visual impact on schemes. C – Specifically requires plot sizes to meet local demand but if there is no local demand this cannot be complied with. Regarding the provision of affordable SCB plots for schemes over 250 dwellings it is not clear how this would be delivered. This also has the potential to reduce the amount of affordable social rent units on a site which currently are the most in need and house the more vulnerable in society. The policy states that schemes over 100 dwellings should use a design code but this conflicts with Policy DS02 which requires design codes on all major schemes or those in environmentally or heritage sensitive locations. There needs to be consistency where Design Codes are required. Finally, the policy states that all plots must be completed within 3 years of the plot purchase. This is not a reasonable requirement as time limits for development commencing are set in the relevant permission and once implemented there is no requirement to complete a scheme. Further the policy does not set out what would happen if it not completed within 3 years from the plot being purchased.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: While the monitoring evidence suggests the current approach is providing enough SCB plots to meet the identified need if the Council do want to respond more positively. a better and more proactive approach would be for the Council to allocate sites specifically for SCB housing in locations where need and demand is evidenced with reasonable contributions from certain scale developments to be collected towards the delivery of these plots.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth. The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as was adopted in the Sedgemoor Local Plan (adopted 2019), for example.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo_20. The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as was adopted in the Sedgemoor Local Plan (adopted 2019), for example.

Full name: Simon Collier

Organisation (where relevant): Collier Planning

Other party name (if relevant): Eagle One MMIII Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth. The identification of specific land for self-build plots would be more appropriate than including a requirement for housing developments to include such plots. A policy allowing such housing as an exception to normal policies should also be considered, as was adopted in the Sedgemoor Local Plan, for example.

Full name: Jozie Bannister

Organisation (where relevant): Devonshire Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: This policy will not increase the provision of self-build plots, it will simply delay the delivery of housing. The market in recent history does not support self-build dwellings like it used to as fewer people are wanting to build their own home and modern lending requirements are making this prohibitive, unlike in years gone by. It is no longer the accessible and affordable way of owning your own home.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Draft Policy HN05 states that on sites of 20 or more dwellings, 5% should be made available as serviced plots for self and custom build. Whilst the NPPF sets out that Council's should make provision for self- build and custom build housing (para. 73), the 20-dwelling threshold and 5% requirement is not justified and there is no evidence to explain what this is based on. Whilst the proportion of self-build and custom housing is considered by the Council to be viable within the Viability Appraisal, no justification is provided within the Viability Appraisal or Sustainability Appraisal as to why these thresholds have been set. Moreover, the policy applies district-wide (with the exception of the Built-up Area Boundaries defined in the Cranbrook Plan), and does not allow for any flexibility to respond to local circumstances. The Landowner, therefore, objects to this policy.

Full name: Zoe Mason

Organisation (where relevant): Lichfields

Other party name (if relevant): Mr M.J. Nancekivell and Mr R.P. Nancekivell

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

5.9 Draft Policy HN05 states that on sites of 20 or more dwellings, 5% should be made available as serviced plots for self and custom build. Whilst the NPPF sets out that Council's should make provision for self-build and custom build housing (para. 73), the 20-dwelling threshold and 5% requirement is not justified and there is no evidence to explain what this is based on. Whilst the proportion of self-build and custom housing is considered by the Council to be viable within the Viability Appraisal, no justification is provided within the Viability Appraisal or Sustainability Appraisal as to why these thresholds have been set.

5.10 Moreover, the policy applies district-wide (with the exception of the Built-up Area Boundaries defined in the Cranbrook Plan), and does not allow for any flexibility to respond to local circumstances. The Landowner objects to this policy.

Full name: Owen Jones

Organisation (where relevant): LRM Planning

Other party name (if relevant): David Wilson Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

9.46 DWH are supportive of Policy HN05 which will be a key component of how the needs of those wishing to build or commission their own home will be met over the plan period.

9.47 Notwithstanding their general support for the emerging Policy, DWH are concerned with the proposed requirement for self-build plots to have a suitable road access delivered at an early stage of the development. For strategic sites, which are often subject of phasing, it could be impractical to provide a suitable road access at an early stage of the development. A more practical approach would be to require a developer to provide a suitable road access for the self-build plots at an early stage of the phase of the development that they are located within. This modest amendment would help to improve the effectiveness of emerging Policy HN05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggested changes “B. Have suitable road access delivered at an early stage of the phase of development that they are located within in the development;”

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Neil Mantell

Organisation (where relevant): LRM Planning

Other party name (if relevant): The Cherwell Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The Cherwell Group are supportive of Policy HN05 which will be a key component of how the needs of those wishing to build or commission their own home will be met over the plan period.

Notwithstanding their general support for the emerging Policy, the Cherwell Group is concerned with the proposed requirement for self-build plots to have a suitable road access delivered at an early stage of the development. For strategic sites, which are often subject of phasing, it could be impractical to provide a suitable road access at an early stage of the development. A more practical approach would be to require a developer to provide a suitable road access for the self-build plots at an early stage of the phase of the development that they are located within. This modest amendment would help to improve the effectiveness of emerging Policy HN05.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: SUGGESTED CHANGES

“B. Have suitable road access delivered at an early stage of the phase of development that they are located within"

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Due to the significant policy issues concerned.

Full name: Oliver Keates

Organisation (where relevant): OBK Land and Planning Ltd

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: I object to a mandatory percentage on self-build/ custom build housing, instead this should be based on evidenced need.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy sets a 5% self-build requirement on all sites of 20 or more dwellings, yet provides no evidence of the needs or demands to support this requirement or ultimately the likelihood of the policy being effective. There is no evidence to support the idea that self-builders will want to build within the context of a general housing estate and it may reduce the ability to be innovative and creative. It also is likely to create logistical issues during the construction process

Requirement A of the policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise, plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable.

Requirement C of the Policy requires the size of the self build dwellings to be demand led, even though the provision is not driven by demand, it is driven by a unevidenced proportional approach. Matching local demands will therefore be difficult in many circumstances.

Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. There is no indication of the consequences of such a

policy on a project that is underway which may have been delayed because of a change of circumstance or issues as part of the build process. This is unreasonable and not justified and should therefore be removed from the policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN05 should be significantly modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified. The basis for requiring a proportion of self-build on all schemes of 20 or more dwellings needs to be re-considered and evidenced by needs and demands, otherwise the policy will be ineffective and unjustified. We would suggest that the policy should be modified to be supportive in general of self-build development and set out the circumstances where applications would be positively received rather than set out specific site specific requirement that reduce the flexibility and innovation intended to be a key part of self-build. As an alternative specific allocation of self-build sites that is evidenced by local need and demand is likely to be far more effective.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy sets a 5% self-build requirement on all sites of 20 or more dwellings, yet provides no evidence of the needs or demands to support this requirement or ultimately the likelihood of the policy being effective. There is no evidence to support the idea that self-builders will want to build within the context of a general housing estate and it may reduce the ability to be innovative and creative. It also is likely to create logistical issues during the construction process.

Requirement A of the policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise, plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable.

Requirement C of the Policy requires the size of the self build dwellings to be demand led, even though the provision is not driven by demand, it is driven by a unevidenced proportional approach. Matching local demands will therefore be difficult in many circumstances.

Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. There is no indication of the consequences of such a

policy on a project that is underway which may have been delayed because of a change of circumstance or issues as part of the build process. This is unreasonable and not justified and should therefore be removed from the policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN05 should be significantly modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified. The basis for requiring a proportion of self-build on all schemes of 20 or more dwellings needs to be re-considered and evidenced by needs and demands, otherwise the policy will be ineffective and unjustified. We would suggest that the policy should be modified to be supportive in general of self-build development and set out the circumstances where applications would be positively received rather than set out specific site specific requirement that reduce the flexibility and innovation intended to be a key part of self-build. As an alternative specific allocation of self-build sites that is evidenced by local need and demand is likely to be far more effective.

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable.

Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. This is unreasonable and not justified and should therefore be removed from the policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN05 should be modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on these and previous representations made on the Plan

Full name: Stuart Houlet

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Waddeton Park Limited (Honiton)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: (PCL Planning on behalf of Waddeton Park Limited (Honiton): The policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable. Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. This is unreasonable and not justified and should therefore be removed from the policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN05 should be modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: in order to provide greater elaboration of the detail of these representations

Full name: Will Ridalls

Organisation (where relevant): PCL Planning Ltd

Other party name (if relevant): Simon Stokes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy requires self build plots to be marketed for at least 24 months from the point of being serviced and developable, and only after the lapse of this period can they be made available for development on the open market. We consider this period is too long and should be reduced to one year consistent with other local planning authorities. Otherwise plots will remain vacant for extended periods of time and housing delivery will be delayed. Marketing for a year is more reasonable. Additionally, this policy requires self-build houses to be completed within 3 years of purchasing a developable plot. This is unreasonable and not justified and should therefore be removed from the policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Modifications to the above policies are required. For Policy HN02 there should be greater recognition of the flexibility of approach and the circumstances such as viability that will be important considerations. Furthermore, the tenure mix should include a degree of flexibility between social and affordable rent. Policy HN03 is unnecessary and overly onerous and should be deleted from the Plan. Policy HN05 should be modified to reduce the length of marketing period and to remove the 3-year completion period as these are both unreasonable and unjustified.

Full name: Jeremy Gardiner

Organisation (where relevant): Pegasus Group

Other party name (if relevant): Taylor Wimpey Strategic Land

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Objection is raised to the requirement for "At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots." Firstly, including "at least" introduces uncertainty around what the requirement will actually be in any individual case – it is vague and imprecise. Secondly, the evidence base for the local plan contains document "'HOU-017" which provides some data on self-build need but only up to October 2021 – the evidence base supporting this policy should be updated. Thirdly, 5% of dwellings on all sites over 20 dwellings appears to provide more than the required number of plots as evidenced in the self-build register data. Fourthly, some people on the self-build register will not want a plot within a larger housing scheme, as shown from the evidence base. The Council has already delivered self-build opportunities without requiring larger developments to put aside land for this type of use, predominantly on small individual sites. It would be preferable for this policy to encourage this type of provision so that larger sites can concentrate on delivering affordable housing, open space, community facilities, and other infrastructure which smaller schemes cannot provide.

Full name: Damien Lynch

Organisation (where relevant): Planning Issues

Other party name (if relevant): Churchill Living and McCarthy Stone

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is recommended that specialist older persons housing schemes are exempted from the requirement to provide self-build plots.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It is recommended that specialist older persons housing schemes are exempted from the requirement to provide self-build plots.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

4.75. Bloor Homes objects to this policy and its requirements to provide for:

- At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self- build plots.
- Be subject to a prescribed and restrictive approach to marketing and pricing.
- Have road access at an early stage; and
- Be of a size to meet local demand

4.76. Furthermore, for sites over 250 dwellings such as Land to the South of Littleham, a proportion of self/custom build plots must be made available for affordable housing whilst there also needs to be a design code, which should be used to provide 'plot

passports' that create a simple, succinct summary of each plot as a reference point for the purchaser.

4.77. The need for a variety (mix) of new housing is supported, but Policy HN05 should take a flexible rather than prescriptive approach. Some of the requirements for the self-build element in terms of quantum, availability, infrastructure provision, and house types will have significant viability considerations for housebuilders. Notwithstanding this, there is no evidence presented to support the levels suggested or the thresholds set for self and custom build housing to come forward.

4.78. On a practical level, the inclusion of self/custom build raises potential conflicts in terms of the organisation and management of large residential sites. This because there is a need to provide access (through sites) to the self/custom build plots, to ensure all different self/ custom builders are meeting all of the site guidelines and to make certain there is health and safety compliance. The requirement to manage a (potentially) high number of builders together with the main developer will often cause problems. This is exasperated if the level of custom/self-build is raised to the quantum suggested in this policy as well as if it includes both market and affordable housing.

4.79. Moreover, there is no legislative or national policy basis for imposing an obligation on landowners or developers of sites to set aside plots for self/custom build housing.

4.80. Under the Self Build and Custom Housebuilding Act 2015 and 2021, and as referenced in NPPF Paragraph 63, it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self/custom build housing. Further, PPG sets out ways in which the Council should consider supporting self/custom build by 'engaging' with developers and landowners and 'encouraging' them to consider self/ custom build where there is interest.

4.81. Bloor Homes object to this policy.

4.82. There is a requirement to include more flexibility within the policy. The Council should seek to adopt an approach that accords more with national guidance that seeks the local authority to take the lead and work with developers to encourage more self-build plots.

4.83. In addition, further consideration should be given to the viability of sites and the competing requirements relating to affordable housing, housing for older people, and self-build (amongst others). There is a need to deliver much needed new housing and the Council should adopt a pragmatic, flexible to secure a mix of housing on each site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4.84. Given this, it is suggested that custom/self-build plots should be the subject of a 12-month marketing period provision. If the plots are not taken forward then the policy should allow them to revert to open market housing.

Full name: Elliot Jones

Organisation (where relevant): Planning Potential

Other party name (if relevant): Bloor Homes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy HN05 and others

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Please see Supporting Statement

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see Supporting Statement

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Please see Supporting Statement

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): Sidbury LVA LLP

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Whilst we support the Council's efforts to deliver a diversified range of housing as part of the plan, at present, we do not consider the draft Policy to be sound for the following reasons:

As an overarching point, there is no justification provided for the requirement of 5% on sites of 20 dwellings or more. Justification should consider absolute need moving forward, but also take into account consented supply as well as realistic levels of demand for self-build plot purchase within larger "host" development sites.

At a practical level, there remains a fundamental conflict between the characteristics that typically attract demand from custom / self-build purchasers and trying to accommodate such plots on a wider "host" development site:

• With the need for at least some design continuity between the "host" site and the self/custom build plots, this takes away the freedom within the self-build plots.

• That being the case, the developer would be able to achieve economies of scale and deliver the same product at a lower price than it would cost a self-builder to achieve a building of the same floorspace.

• Unless a self-build site can have its own separate access (which in most cases is unachievable and unviable), the contracting associated with multiple self-build units, on top of any contractors associated to the "host" site is a significant health and safety challenge.

Our position is that if there is demonstrable and viable demand for self and custom built plots, the delivery of these would be more appropriate on sites specifically allocated for self-build (i.e. not part of larger host developments), or on sites where an element of self/custom build is expressly supported by the land owner.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Given the extensive nature of the comments, we do not propose specific wording changes and urge the Council to consider substantive changes to this draft Policy prior to submission.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that Sidbury LVA LLP is present to participate in the hearing session for Policy HN05 owing to their interest in Land South of Furzehill (Sidm_34). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): 3West Group

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: No

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Whilst we support the Council's efforts to deliver a diversified range of housing as part of the plan, at present, we do not consider the draft Policy to be sound for the following reasons:

As an overarching point, there is no justification provided for the requirement of 5% on sites of 20 dwellings or more. Justification should consider absolute need moving forward, but also take into account consented supply as well as realistic levels of demand for self-build plot purchase within larger "host" development sites.

At a practical level, there remains a fundamental conflict between the characteristics that typically attract demand from custom / self-build purchasers and trying to accommodate such plots on a wider "host" development site:

• With the need for at least some design continuity between the "host" site and the self/custom build plots, this takes away the freedom within the self-build plots.

• That being the case, the developer would be able to achieve economies of scale and deliver the same product at a lower price than it would cost a self-builder to achieve a building of the same floorspace.

• Unless a self-build site can have its own separate access (which in most cases is unachievable and unviable), the contracting associated with multiple self-build units, on top of any contractors associated to the "host" site is a significant health and safety challenge.

Our position is that if there is demonstrable and viable demand for self and custom built plots, the delivery of these would be more appropriate on sites specifically allocated for self-build (i.e. not part of larger host developments), or on sites where an element of self/custom build is expressly supported by the land owner.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Given the extensive nature of the comments, we do not propose specific wording changes and urge the Council to consider substantive changes to this draft Policy prior to submission.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: It is important that 3West Group is present to participate in the hearing session for Policy HN05 owing to their interest in the Land north and east of Exton Farm (Wood_28). It is important that they are given the opportunity to make their case in relation to this policy.

Full name: Cara Chambers

Organisation (where relevant): Stantec

Other party name (if relevant): KCS Development

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

4.4.6 This policy requires that at least 5% of dwellings on sites of 20 dwellings or more are serviced custom and self-build plots.

4.4.7 However, there are inherent challenges with providing self-build plots on smaller sites given resourcing and cost which could undermine deliverability of sites. As is stated in Paragraph 73 of the NPPF, small sites play an important role in contributing to housing supply as they can be built out quickly and so any deliverability issues here could stall housing delivery.

4.4.8 Therefore, self-build and custom build dwellings are better placed on larger sites. Policy HN05 is unsound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

4.4.8 Therefore, self-build and custom build dwellings are better placed on larger sites. Policy HN05 is unsound.

Full name: Nathan Price

Organisation (where relevant): Tetlow King Planning

Other party name (if relevant): South West Housing Association Planning Consortium

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN05 adds that on sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, subject to viability. The SWHAPC supports this policy as Custom and Self-Build housing can represent a further route to affordable housing within the housing market.

2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.: Draft Policy HN05 outlines that Custom and Self-Build homes will be required on development proposals of 20 or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders. The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low. We suggest that this threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings. A policy requirement to deliver a minimum percentage of self-build units on a scheme can create challenges for Affordable Housing Providers with grant allocations. Self-Build plots are of an open market tenure; if an Affordable Housing Provider wishes to deliver a 100% affordable scheme it cannot include any open market units, otherwise it cannot secure grant funding to all plots, including the S106 policy requirement. The SWHAPC therefore ask that draft Policy HN05 includes no Custom and Self-Build requirement on 100% affordable housing proposals given that these sites are meeting much of the acute affordable housing need in East Devon. Furthermore, the SWHAPC suggests an inclusion in the policy wording which would see an order of priority for any viability challenges to ensure that custom and self-building housing is removed from schemes first before any loss in affordable housing provision is considered. The SWHAPC would welcome some clarification on how the Council will ensure that quality is maintained for the Self-Build plots. The SWHAPC advises that the Council refers to

the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy.

Full name: Nathan Price

Organisation (where relevant): Tetlow King Planning

Other party name (if relevant): South West Housing Association Planning Consortium

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Tetlow King Planning as an agent on behalf of the South West Housing Association Planning Consortium (SWHAPC)

Draft Policy HN05 adds that on sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, subject to viability. The SWHAPC supports this policy as Custom and Self-Build housing can represent a further route to affordable housing within the housing market.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Draft Policy HN05 outlines that Custom and Self-Build homes will be required on development proposals of 20 or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders. The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low. We suggest that this threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings.

A policy requirement to deliver a minimum percentage of self-build units on a scheme can create challenges for Affordable Housing Providers with grant allocations. Self-Build plots are of an open market tenure; if an Affordable Housing Provider wishes to deliver a 100% affordable scheme it cannot include any open market units, otherwise it cannot secure grant funding to all plots, including the S106 policy requirement.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of

the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SWHAPC therefore ask that draft Policy HN05 includes no Custom and Self-Build requirement on 100% affordable housing proposals given that these sites are meeting much of the acute affordable housing need in East Devon.

Furthermore, the SWHAPC suggests an inclusion in the policy wording which would see an order of priority for any viability challenges to ensure that custom and self-building housing is removed from schemes first before any loss in affordable housing provision is considered.

The SWHAPC would welcome some clarification on how the Council will ensure that quality is maintained for the Self-Build plots. The SWHAPC advises that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy.

Full name: Frances Lennon

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Policy HN05: Self-build and custom build housing [OBJECT]

2.28 There is not sufficient evidence to support the Council's approach to Policy HN05 and it needs to be deleted of substantially modified. By providing 5% of new dwellings on all developments over 20 homes as self or custom build housing, the policy would be seeking to deliver far more self and custom build homes than evidence suggested is needed. The Council's self-build and custom build monitoring information (lined as footnote 45 within the plan and document HOU-017) is out of date and in any event show only around 200 entries for people interested in self and custom build housing options. This is significantly less than the level of provision that would be secured from the 5% requirement being suggested by Policy HN05.

2.29 Rather than a blanket approach to self and custom build provision as part of all larger residential developments, the plan should be taking a more refined approach to identifying those sites that are most suitable to the types of self and custom build homes that are attractive and valuable for those interested in this provision, including projects that would be attractive to Community Led Housing Groups, Community Land Trusts and Cohousing groups (as identified in the supporting text at 8.21 of the plan).

2.30 There is no evidence to show that the generic approach being proposed by Policy HN05 would meet the needs of those interested in self and custom housebuilding options, either in respect of the total quantum, or the types of sites (plots) that may be made available.

2.31 If there is intended to be provision as part of larger strategic development sites (which often results in limited take up), then this can often only be meaningful achieved via the provision of "shell homes" following a 'custom build' model, where future occupiers have the option to significantly influence the internal layout and fitout of these buildings including the way in which internal works are procured and progressed.

Other options for fully self-build plots often result in significant phasing, completion, infrastructure and health and safety issues, where the timing and rate of construction is not able to be controlled alongside the build out of the other parts of the development.

2.32 In all cases where self or custom homes or plots are secured as part of any planning permission, then there should always be 'cascade' mechanisms included to ensure that these homes/plots can revert to standard models of provision after an appropriate marketing period (not more than 12 months).

2.33 As drafted Policy HN05 is not sound as it is not supported by appropriate robust evidence and is not justified. If the policy is to be retained then it should be substantially modified to better reflect evidenced levels of need in East Devon for self and custom build housing, and how this can be provided in a way that meaningfully contributes to meeting those needs, and not adversely impacting on the capacity and delivery of all major housing sites.

Full name: Andrew Ross

Organisation (where relevant): Turley

Other party name (if relevant): Bloor Homes Exeter

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Policy HN05: Self-build and custom build housing [OBJECT]

2.26 There is not sufficient evidence to support the Council's approach to Policy HN05 and it needs to be deleted of substantially modified. By providing 5% of new dwellings on all developments over 20 homes as self or custom build housing, the policy would be seeking to deliver far more self and custom build homes than evidence suggested is needed. The Council's self-build and custom build monitoring information (lined as footnote 45 within the plan and document HOU-017) is out of date and in any event show only around 200 entries for people interested in self and custom build housing options. This is significantly less than the level of provision that would be secured from the 5% requirement being suggested by Policy HN05.

2.27 Rather than a blanket approach to self and custom build provision as part of all larger residential developments, the plan should be taking a more refined approach to identifying those sites that are most suitable to the types of self and custom build homes that are attractive and valuable for those interested in this provision, including projects that would be attractive to Community Led Housing Groups, Community Land Trusts and Cohousing groups (as identified in the supporting text at 8.21 of the plan).

2.28 There is no evidence to show that the generic approach being proposed by Policy HN05 would meet the needs of those interested in self and custom housebuilding options, either in respect of the total quantum, or the types of sites (plots) that may be made available.

2.29 If there is intended to be provision as part of larger strategic development sites (which often results in limited take up), then this can often only be meaningful achieved

via the provision of “shell homes” following a ‘custom build’ model, where future occupiers have the option to significantly influence the internal layout and fitout of these buildings including the way in which internal works are procured and progressed. Other options for fully self-build plots often result in significant phasing, completion, infrastructure and health and safety issues, where the timing and rate of construction is not able to be controlled alongside the build out of the other parts of the development.

2.30 In all cases where self or custom homes or plots are secured as part of any planning permission, then there should always be ‘cascade’ mechanisms included to ensure that these homes/plots can revert to standard models of provision after an appropriate marketing period (not more than 12 months).

2.31 As drafted Policy HN05 is not sound as it is not supported by appropriate robust evidence and is not justified. If the policy is to be retained then it should be substantially modified to better reflect evidenced levels of need in East Devon for self and custom build housing, and how this can be provided in a way that meaningfully contributes to meeting those needs, and not adversely impacting on the capacity and delivery of all major housing sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: To elaborate on issues raised and respond as appropriate during hearings.

Full name: Adrian Toole

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: All OK

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: All OK

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: All OK

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: [Tetlow King Planning represents the South West Housing Association Planning Consortium (SWHAPC) which includes leading Housing Associations (HAs) across the South West.]

Draft Policy HN05 outlines that Custom and Self-Build homes will be required on development proposals of 20 or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders. The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low. We suggest that this threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings. A policy requirement to deliver a minimum percentage of self-build units on a scheme can create challenges for Affordable Housing Providers with grant allocations. Self-Build plots are of an open market tenure; if an Affordable Housing Provider wishes to deliver a 100% affordable scheme it cannot include any open market units, otherwise it cannot secure grant funding to all plots, including the S106 policy requirement. The SWHAPC therefore ask that draft Policy HN05 includes no Custom and Self-Build requirement on 100% affordable housing proposals given that these sites are meeting much of the acute affordable housing need in East Devon. Furthermore, the SWHAPC suggests an inclusion in the policy wording which would see an order of priority for any viability challenges to ensure that custom and self-building housing is removed from schemes first before any loss in affordable housing provision is considered. The SWHAPC would welcome some clarification on how the Council will ensure that quality is maintained for the Self-Build plots. The SWHAPC advises that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy. Draft Policy HN05 adds that on sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, subject to viability. The SWHAPC supports this policy as Custom and Self-Build housing can represent a further route to affordable housing within the housing market.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low. We suggest that this threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Pegasus Group, on behalf of Taylor Wimpey Strategic Land

Objection is raised to the requirement for "At least 5% of dwellings on sites planned to accommodate 20 or more homes must be delivered as serviced custom and self-build plots." Firstly, including "at least" introduces uncertainty around what the requirement will actually be in any individual case – it is vague and imprecise. Secondly, the evidence base for the local plan contains document "'HOU-017" which provides some data on self-build need but only up to October 2021 – the evidence base supporting this policy should be updated. Thirdly, 5% of dwellings on all sites over 20 dwellings appears to provide more than the required number of plots as evidenced in the self-build register data. Fourthly, some people on the self-build register will not want a plot within a larger housing scheme, as shown from the evidence base. The Council has already delivered self-build opportunities without requiring larger developments to put aside land for this type of use, predominantly on small individual sites.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would be preferable for this policy to encourage this type of provision so that larger sites can concentrate on delivering affordable housing, open space, community facilities, and other infrastructure which smaller schemes cannot provide.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Draft Policy HN05 adds that on sites of over 250 dwellings or more, a proportion of plots must be made available for affordable housing, subject to viability. The SWHAPC supports this policy as Custom and Self-Build housing can represent a further route to affordable housing within the housing market.

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:

1. Draft Policy HN05 outlines that Custom and Self-Build homes will be required on development proposals of 20 or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders. The SWHAPC does not currently support this element of the draft policy as the threshold of 20 homes is considered far too low.

2. A policy requirement to deliver a minimum percentage of self-build units on a scheme can create challenges for Affordable Housing Providers with grant allocations. Self-Build plots are of an open market tenure; if an Affordable Housing Provider wishes to deliver a 100% affordable scheme it cannot include any open market units, otherwise it cannot secure grant funding to all plots, including the S106 policy requirement.

3. Furthermore, the SWHAPC suggests an inclusion in the policy wording which would see an order of priority for any viability challenges to ensure that custom and self-building housing is removed from schemes first before any loss in affordable housing provision is considered.

4. The SWHAPC would welcome some clarification on how the Council will ensure that quality is maintained for the Self-Build plots. The SWHAPC advises that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. We suggest that this (20 homes) threshold should be increased to apply to significantly larger major housing developments, perhaps those over 500 dwellings.

2. The SWHAPC therefore ask that draft Policy HN05 includes no Custom and Self-Build requirement on 100% affordable housing proposals given that these sites are meeting much of the acute affordable housing need in East Devon.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation (HBF)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy

95. HBF does not consider that requiring major developments to provide for self-builders is appropriate.

96. It is considered unlikely that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Instead, the HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and

cus-tom-build home builders- although this would need to be done through discussion and negotiation with landowners.

97. However, if a self-build policy is be pursued, HBF highlight that if demand for plots is not realised, it is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The Plan should set out the timescale for reversion of these plots to the original housebuilder, which should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self and custom builders. HBF would therefore suggest that any unsold plots should revert to the original developer after a maximum six-month marketing period.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Self-Build and Custom-Build Housing (Strategic Policy HN05 & Broadclyst H6)

• The plan encourages self-build housing as a sustainable way to promote local economic growth and low-carbon construction methods.

• Broadclyst's Policy H6 provides specific plots for self-builders, supporting local trades and craftsmanship.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

2.6.2. Policy HN05 (Self-Build and Custom-Build Housing) – Promotes the inclusion of self-build and community-led housing projects.

2.6.3. Broadclyst NP Policy H6 (Self-Build Housing) – Allocates land for self-build plots to support local people wishing to construct their own homes.

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN05

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The need for the plots to be part of the affordable allocation is confusing, the wording of the clauses on larger sites relates to plots without clear guidance that it means Self-build plots particularly. If self-build plots are defined as affordable, what happens when the first owners want to move on? Are they retained as part of the affordable stock?

HN06

Full name: Helen Dimond

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN06

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The policy regarding replacement dwellings should apply across the whole plan area rather than only outside settlements as appears from the heading . It would be helpful to indicate when such a replacement is justified . There are many cases in Lympstone where a perfectly sound building has been replaced simply because the owner wants a bigger, modern dwelling when the existing could be perfectly adapted . This particularly applies to the replacement of bungalows with large houses.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Omit outside settlement boundaries from the heading to make clear that the policy applies everywhere

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

HN07

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN07

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The supporting text to this policy notes the need to maintain the character of existing dwellings, and to respond positively to the 'context and character' of existing areas. These important requirements should be part of the policy itself, consistent with policies in Chapters 12 (design) and 16 (heritage) of the NPPF. For example paragraph 135(c) states that planning policies and decisions should ensure that developments "are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change..".

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Adjust policy to ensure that proposals respond appropriately to the character of the building and area. A cross reference to heritage policies elsewhere in the Plan would also be helpful, as this will deal with proposals that may impact the significance of heritage assets.

HN08

Full name: Roy Russell

Organisation (where relevant): Sidmouth Cycling Campaign

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN08

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: We object to Clause B which states that cycle storage facilities are not required if the site has access to regular public transport or is within 800m walking distance of a town centre. This should be revised as cycling is a particularly attractive mode of transport if the site is within 800m of a town centre. This policy conflicts with Policy TR04 which requires a minimum of 1 secure cycle parking space for each residential bedroom. It also conflicts with National Planning Policy Framework which states that “planning policies should…provide for … facilities such as secure cycle parking” (Para 111.d)

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This clause should be amended to remove the reference to cycle storage facilities

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rob Martin

Organisation (where relevant): Clyst Honiton Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN08

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The provision of new shops etc in Clyst Honiton is not supported as it is excluded from the tier 4 villages. This seems unfair and self-defeating, particularly as it had most of the services until Cranbrook came along. The people of Clyst Honiton, particularly those who are less mobile are in danger of being completely without services, even if there was an opportunity to provide them.

HN09

Full name: Paul Andrew Beard

Organisation (where relevant): Andrew Beard Planning

Other party name (if relevant): Exeter & Honiton Gospel Hall Trust

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN09

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Site allocation of Langaton Lane for gypsy fails to meet policy HN09.

Delete 15 minutes from criterion A

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Dr Simon Ruston

Organisation (where relevant): TravellerSpace

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN09

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Introduction

1. This response has been drafted on behalf of TravellerSpace, a registered charity supporting Gypsies, Irish Travellers and New Travellers in Cornwall and the Devon.

2. TravellerSpace aims to:

• Break down barriers which prevent Gypsies and Travellers having equality of access to health, education and welfare services.

• Support Gypsies and Travellers in ensuring their voices are heard in decision and policy making processes.

• Provide support for Gypsies and Travellers in health, education and welfare matters.

• Provide play and creative opportunities for Gypsy & Traveller children and young people

• Support Gypsy & Traveller young people who have been excluded from school or who are disengaged with the learning process

• Develop and deliver training and workshops for schools, service providers, and other statutory and non-statutory agencies

• Contribute to seminars, conferences, research and training events to highlight the experiences of Gypsies and Travellers

• Enable Gypsies and Travellers to access volunteering and training opportunities.

• Have a voice locally regionally and nationally in forums which highlight the issues facing the Gypsy and Traveller communities, and work to bring about positive change.

• Inform and educate the wider community about issues which affect Gypsies and Travellers, and to

• Raise awareness of Gypsy and Traveller cultures and traditions. The response deals solely with Policy HN09: Gypsy and traveller sites, the Gypsy and Traveller Accommodation Assessment and some comments on the site section methodology. Policy HN09: Gypsy and traveller sites

4. We have a number of concerns over the wording of this policy and its conformity with Planning Policy for Traveller Sties (PPTS) which we will work through line by line using track changes: Proposals for new permanent or transit gypsy, travellers or travelling showpeople sites or extensions of existing sites will need to meet all of the following: We would suggest amending this to the following wording in order be more permissive, nb this includes the capitalising of the different groups: Proposals for new permanent or transit Gypsy, Travellers or Travelling Showpeople sites or extensions of existing sites will be considered against the following criterion: A. To be located inside or adjoining a settlement boundary, or within 15 minutes travel time by safe, walking, cycling or public transport providing access to a range of services including school and health services; There is nothing within PPTS which has these requirements. Sites are as a matter of principle acceptable within the open countryside and services do not need to be accessed by sustainable transport. PPTS has a different approach to sustainability which can be found at paragraph 13. We would suggest the following wording: To be located within a reasonable distance of a range of services including school and health services; B. To have a site size and have a number of pitches that is appropriate, and not overlarge, in relationship to the nearest settlement in the settlement hierarchy and its range of services and infrastructure; The wording here is inappropriate given that a similar criterion would not be applied to conventional housing. The criterion should be deleted. C. To not exceed 15 pitches as a maximum; PPTS does not have this requirement, and as such the criterion should be deleted. D. To be assimilated into the surrounding landscape without significant adverse effect; There is no requirement in PPTS for sites to be assimilated into the surrounding landscape. We would suggest the following wording: To not have a significant adverse effect on the surrounding landscape; E. To have acceptable vehicular access, on site turning, parking and servicing; Agreed F. To be in locations that are not vulnerable to flooding or affected by any other environmental hazards that may affect the residents'health and welfare; and Agreed G. To have access to essential utilities - water supply, sewerage, drainage, waste disposal. Where service connections are needed these need to be readily available on or close to the site. Agreed Preference will be given to the expansion and intensification of existing sites, subject to maximum site threshold of 15 pitches. If expansion or intensification is impractical, then account will be taken of the cumulative impacts of additional sites on the character of the local area and on the local community. There is nothing in PPTS which supports this

approach–suggest deletion. In addition to meeting these requirements, planning applications for gypsy and traveller pitches, or plots for travelling Showpeople, on windfall sites in the countryside outside settlement boundaries must demonstrate: H. The status of the applicant / intended occupant/s meeting the national definition for gypsy, traveller or travelling showpeople and the pitch or plot will be occupied by at least one person with a strong local connection to East Devon district; and Whilst it is an obvious point that sites will be need to be conditioned to the PPTS definition, there is nothing in that requires there to be a local connection. See PPTS at para. 25e. I. There is a proven unmet need for new pitches or plots, having regard to the supply of deliverable pitches or plots and their availability to gypsies and travellers or travelling showpeople who have a strong local connection to the district. Again, this approach is contrary to PPTS. There is no need to demonstrate that there is a proven unmet need for pitches in order for permission to be granted. See PPTS at para. 11. Safeguarding sites Existing authorised sites, sites with planning permission, and allocations for Gypsy and Traveller Use or for Travelling Showpeople use, will be safeguarded for the number of pitches/plots permitted. If, in exceptional circumstances (such as long-term vacancy and a demonstrable lack of need), changes of use or redevelopment to non-Gypsy/Traveller or Travelling Showperson's accommodation use are permitted, then, if need exists in the District, suitably located and laid out alternative provision must be provided prior to the loss of the existing site or part of thereof. This policy applies across the whole plan area including the Cranbrook Plan area. Given the national shortage of Gypsy and Traveller sites, we would suggest the deletion of the second part of this. The loss of sites should be resisted. The Gypsy and Traveller Accommodation Assessment

5. First and foremost it would appear that the LPA's current approach to the need figure in part takes account of the amended PPTS definition:

1. For the purposes of this planning policy "gypsies and travellers"means: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. [emphasis added]

6. This means that the definition in effect covers all Romany Gypsies and Irish Travellers, whether they have ever travelled or not. The inclusion of both non PPTS and 'undetermined' goes some way to meeting the requirement to assess the need.

7. However, the GTAA is now out of date as it will have not properly sought out the needs of persons with a cultural tradition of nomadism or of living in a caravan.

8. This is particularly relevant as the GTAA in our view has failed to properly consider the needs of those in bricks and mortar. The GTAA records at 3.17: The 2021 Census recorded 33 households that identified as either Gypsies, Irish Travellers, or Roma who lived in a house or bungalow in East Devon and 16 living in a flat or maisonette.

9. and then at 3.18: ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from the stakeholder interviews; information from housing registers; and other local knowledge from stakeholders. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known. 10. The GTAA then records:

6.4 Despite all of the efforts that were made it was not possible to identify any households living in bricks and mortar to interview. 11. This is of concern and means that the needs of G+T who are often forced into housing due to a lack of sites will not have been properly considered. 12. It has been confirmed to us that the DCC Gypsy, Roma, Traveller & Showmen Advisory Teacher was contacted by a M Bayliss of ORS in July 2023 relation to East Devon and Exeter Bricks and Mortar Residents. The response given was the following: Family 1 would prefer to stay in housing but see the need for new pitches/sites. Family 2 would want to move to a site/land–Mum, Dad, 3 daughters (17,15,13). They would literally go anywhere. Social renting or private Family 3 as above would love anywhere that was appropriate– Mum, 2 daughters (13 & 8), 2 sons (10 & 1) social renting Family 4–Exeter area–Mum, Dad, 2 daughters, 1 son (3) social renting 13. None of this need has appeared within either accommodation assessment. 14. Furthermore, the research company in question have worked with TravellerSpace on the Cornish GTAA and it is surprising that they were not also consulted.

Site selection methodology

15. We are concerned that requirement B of Requirements to pass sifting is narrower than the range of locations permitted by PPTS. As to how PPTS should be interpreted the following from an appeal in Malvern1 is a helpful guide: 10....This paradox goes to the heart of the issue of sustainable location of gypsy sites. Many gypsy sites are in the countryside, and this is accepted by PPTS. Paragraph 25 notes that sites in the open

countryside away from exiting settlements or outside of areas allocated in the development plan should be strictly controlled. This implies that even in these areas some sites are acceptable.... ...11. When PPTS talks of sustainability it does so at paragraph 13 and does not mention reducing travel by private car. Many decisions on gypsy appeals accept that gypsy sites will not necessarily be located within walking distance of facilities and that providing a settled base in itself helps as it reduces travel for the occupiers of the site.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 16. We would invite the LPA to reconsider the wording of the policy, commission a new GTAA and reconsider the site sifting approach.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Suzanne Hales

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN09

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: Consultation with neighbours is key to where how and what areas are used for travellers sites.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

HN10

Full name: Mary Jeffery

Organisation (where relevant): Wilmington Community Land Trust

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Good that Paragraph B recognizes a community's housing need evidence can include that of immediately abutting parishes. A village community eg Wilmington comprises 6 abutting parishes.

Good that Paragraph C includes Comunity Land Trusts.

Good that a small % of market housing can be permitted in a development of affordable homes where grant funding is available in order to compensate the landowner for the land. Very few rural landowners will gift land to a community without reward.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: As my answer in 2 a

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

Full name: Terry Sneller

Organisation (where relevant): Dorset Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: The village [Uplyme] could therefore be considered as an appropriate location to meet local needs especially when considered alongside Lyme Regis. The local needs of the wider area, including Lyme Regis should be considered in this context and the wording of Policy HN10 Exception Sites, that need can arise from neighbouring parishes as well as from the host parish, is supported.

Full name: Sue Cooper

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: Exception sites should only be based on the need in the host parish and abutting parishes if they are of same or lower tier in the settlement hierarchy otherwise smaller settlements could have to accommodate the need of larger nearby villages or small towns which are more sustainable. This is not sound as it is contrary to the aims of the spatial strategy. i.e. An East Budleigh exception site could be justified by the need of a much larger and sustainable settlement of Budleigh Salterton or indeed the village of Woodbury.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Provide affordable housing meeting a proven, unmet need of the local community, noting that such need may be addressed through local plan allocations. Need can be evidenced by a Housing Needs Survey or other local data such as a Neighbourhood Plan, Parish Survey or Parish Plan. Need is to be based on that existing in the host Parish where the proposal falls but can include need arising from any immediately abutting parish, excluding those falling in Tiers 1 or 2 of local plan policy and where an immediately abutting parish is higher in the settlement hierarchy than the host parish; and

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Anthony Sykes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Why mix old with cheap new infill unless new is in line with old character.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: new is in line with old character.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: open to abuse

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Too expensive.So development should be dropped .

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Try another county.Devon is built on second homes that dont benifit locals financially or environmently.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Policy HN10 states:

"A small element of market housing may be included on any development, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. However, at least 66% of dwellings must be affordable dwellings. Where grant funding is available the market housing percentage should be adjusted downward."

Para 8.49 states:

"National policy allows a small amount of market housing as a cross-subsidy to enable affordable housing delivery without grant funding. At least 66% of dwellings on exception sites must be affordable, with adjustments if grant funding is available."

The NPPF states:

"A proportion of market homes may be allowed on the site at the local planning authority’s discretion, for example where essential to enable the delivery of affordable units without grant funding."

We don't believe that 34% open market dwellings will be sufficient to cross-subsidise 66% affordable dwellings without grant. The NPPF does not state that open market homes are allowed in order to enable affordable housing delivery without grant funding; instead, it offers this as an example of one justification for open market homes being provided. The more common reason for having to provide some open market homes is to incentivise landowners to offer RESs by offering them services plots with planning consent in lieu of a land value. Under these circumstances, normal levels of grant funding is required. As drafted, does Policy HN10 allow for this?

We would suggest a less restrictive policy such as:

"Proposals for permanent affordable housing to meet an identified local need will be permitted as an exception on sites where market housing would not normally be acceptable. A small element of market housing where this will facilitate the successful delivery of the affordable housing."

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:

2.3. Ensuring Affordability & Local Occupancy

2.3.1. Policy HN10 (Rural Housing Exception Sites) – Requires that 66% of homes on rural exception sites must be affordable and retained in perpetuity.

2.3.2. Broadclyst NP Policy H4 – Introduces local connection criteria, prioritising Broadclyst Parish residents or those with strong ties to the area.

2.5. Rural Exception Sites

2.5.1. Strategic Policy HN10 – Encourages small-scale rural exception housing to meet local needs, with a requirement for a minimum of 66% affordable housing.

2.5.2. Broadclyst NP Policy H5 (New Housing in Broadclyst Parish) – Supports rural housing development where it directly meets local need.

Full name: Angie Hurren

Organisation (where relevant): Broadclyst Parish Council

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN10

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: We welcome policies that facilitate small-scale rural exception sites to meet local housing needs. However, these sites must be carefully planned to avoid speculative development under the guise of affordability. NPPF paragraph 80 provides guidance on rural housing, stating that development should reflect local needs and contribute positively to rural communities.

HN11

Full name: Megan Masters

Organisation (where relevant): Acorus Rural Property Services Ltd.

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN11

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?: Yes

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: It is noted that policy relating to rural workers housing now seeks to impose a size limitation of 150sqm gross internal area (GIA) for rural workers dwellings to include crucial facilities such as an office/boot room/washroom etc. where the Local Plan currently does not prescribe a size limitation, but a requirement to justify all areas proposed.

The suggested 150sqm is considerably limited for rural workers, in particular, those housing families, and represents a huge reduction to the GIAs currently accepted under the existing local plan. There does not appear to be justification for such reduction nor reasoning for the 150sqm suggested.

There are also implications in terms of meeting the NPPF with good design, which shall be difficult to apply with these restrictions in place. It is expected that this Policy shall lead to a regretful impact on landscape character whereby principles of good design cannot be applied. It is to be noted that these dwellings are, by their nature, developed in open countryside in most occasions, and this is a designation whereby good design should be imperative.

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of

the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: C. The size and scale of rural workers dwellings will be commensurate with the needs generated by the holding and its activities and designed to reflect the location and setting of the proposed site;

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The LPA will be aware of multiple dwellings that have been approved both recently and historically whereby the proposed 150sqm restriction has been hugely exceeded. The LPA were able to permit these dwellings on the basis of them being fully justified on the operations of the holding. Where these dwellings were approved, they were of a high quality design commensurate with landscape character and represented good design.

We are able to share planning reference numbers for examples that Acorus have dealt with in the past, if requested.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Anthony Sykes

Proposal:

8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: HN11

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.: Why mix old with cheap new infill unless new is in line with old character.

2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: new is in line with old character.

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.: open to abuse

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Too expensive.So development should be dropped .

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.: Try another county.Devon is built on second homes that dont benifit locals financially or environmently.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)