

CONSULTATION **RESPONSE**

Development of 6no. dwellings, including 4no. affordable homes (outline permission with all matters reserved except access) (23/2538/OUT) | **Land adjacent to Lawrence Close, Broadhembury**

This document has been prepared in light of consultee and public comments received through the consultation, with the main points raised discussed individually below.

AFFORDABLE HOUSING

The comments from the Housing Enabling Officer (HEO) and Community Land Trust (CLT) are acknowledged.

For avoidance of doubt, the referenced housing need survey (November 2020) has been and is being relied upon by the CLT to support the development of affordable housing (AH) in Broadhembury, as is the case for this application. There is no defined timeframe for what is considered to constitute 'up to date' and it is evident there is still a need in the locality, owing to there being no delivery of AH units and continued efforts by the CLT.

To confirm, the CLT has existed officially since October 2020 and, to date, has made no progress in delivering much needed AH in Broadhembury, with their latest effort comprising the submission of a Permission in Principle (PIP) application, which includes no mechanism for securing AH.

Given the lack of progress achieved by the CLT, the applicant determined that the best chance of delivery was to proceed without their initial involvement.

Notwithstanding these facts, the results of the housing need survey are accepted, which set out a need for *3 rented homes and 1 shared ownership home*. In effort to achieve this, a marketing exercise was undertaken with a number of local Registered Providers to understand if there was any interest.

Unfortunately, due to the scale of the proposal, none of the contacted RPs considered the site viable for affordable rent – as detailed in the RP Report.

As such, first homes have been proposed in the first instance as the most likely way of achieving AH. CLTs suggestion that first homes are not AH is misinformed, with Annex 2 of the NPPF (2023) confirming (c) discounted market sales housing complies with the definition.

That being said, the applicant would welcome engagement with CLT if a collaborative approach would achieve this much-needed AH for Broadhembury. Despite their objection, we agree *this site has the potential to deliver appropriate rental affordable housing using the 'Rural Exception Site' criteria*.

Comments on housing mix are acknowledged and the HEO is respectfully reminded the application seeks outline consent with all matters reserved except access. Details of housing mix would be confirmed at the latter stage, conforming with suggested local need.

ACCESS / CONNECTIVITY

Concern has been raised by residents (predominately of Lawrence Close) regarding the realities of connectivity to Broadhembury due to the footpath which the development would connect to finishing at the Close.



The limited pedestrian connectivity is accepted, however, by adjoining the site to the existing footway, prospective occupants would have direct pedestrian connectivity to public transport infrastructure, namely the eastbound Lawrence Close bus stop.

Vehicular movement is expected to slow at this point into the village, due to the increased presence of buildings, and thus provides a safer transfer point from path to road.

NATIONAL LANDSCAPE

The significance of the newly coined National Landscape (NL, formerly AONB) is of key consideration to the proposal.

This important designation must, however, be considered in context of nearly the entirety of Broadhembury being within the NL (dotted green). Other areas, more centrally, would also trigger other nationally protected designations such as the Conservation Area (CA) and Flood Zone, each presenting further complexities to the delivery and viability of AH.

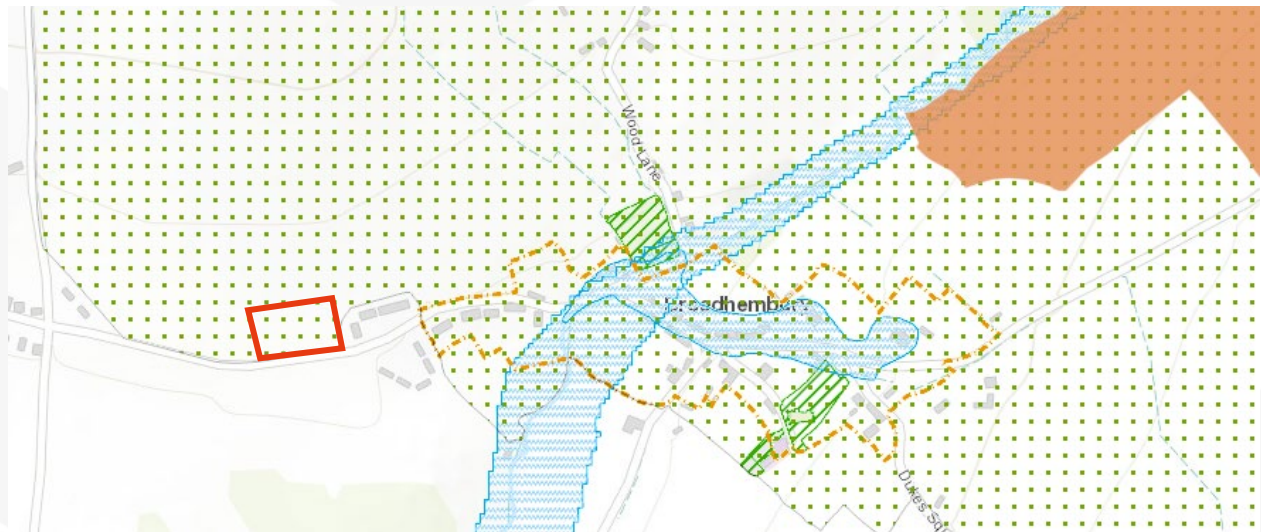


Figure 1 – AONB / NL Identified in Dotted Green (approx. site outline in red)

The legislative requirement for NLs is 'to conserve and enhance the beauty of the area' and the site has been strategically selected in an effort to comply with this provision. By adjoining the proposal to the edge of the village, on land benefiting from a gently south sloping gradient, visual receptors of the site are limited, with any limited views (Figure 2) experiencing the development as part of the village envelope. The prevailing tree line is to be retained and would screen views from the south.



Figure 2 – Nearest Public Receptor (north) Facing South

Whilst the application is at outline stage, all subsequent design and layout would carefully consider the Blackdown Hills AONB Design Guide for Housing. For lighting, the following criteria would be followed:

If external lighting is installed it should only light a specific area such as a drive or parking area and not the wider countryside. Directional cowls should be fitted to stop or limit light spillage, lights should be directed downwards not upwards. Lower wattage bulbs can be used and lights should be fitted with timers and passive infra-red detectors to ensure that they are only on when needed. These steps will help to preserve the AONB's dark starry skies and avoid disturbance to wildlife and neighbours.

The project architect has made contact with Lisa Turner @ Blackdown Hills National Landscape who has confirmed that whilst no formal lighting plan exists for the AONB, a good practice guide is available in 'The Blackdown Hills Good Lighting Guide 2018' along with the para. 19 from the 'Housing Design Guide'.

The Applicant intends to conform with this guidance and would seek to utilise sensitive rural lighting that limit light spillage via various techniques and mitigate negative impacts, such as down lighting, underlighting on street furniture etc.

DRAINAGE

South West Water (SWW) now honour a 'right to connect' to their system (for residential properties), with SWW mapping showing an existing 150dia public combined sewer running west to east within the unnamed land to the south of the site (Figure 3). Whilst currently unconfirmed, the intention would be to install a collective treatment plant before discharging into this existing provision.



Figure 3 – Existing Combined Sewer Connection

In accordance with the following drainage hierarchy, it is anticipated that infiltration will be utilised which will likely comprise independent soakaway's and/or communal soakaway/pond. The applicant wishes to establish the principle of development (AH) ahead of providing formal technical detail.

OTHER MATTERS

In response to more individual concerns raised by residents, and whilst very much at outline stage, we wish to confirm the following:

- The extended red line (approx. 9000sqm) has put forward, at greater expense of the applicant, to ensure the delivery of biodiversity enhancement and local amenity provision can be achieved.
- Contact has been made with East Devon LPA, East Devon Consumer Waste services and Honiton Town Council to understand if dog litter can be collected as part of the current local service, if appropriately located. Whilst at this stage this does not appear to be achievable, and whilst a desirable feature to include at reserved matters stage, if unviable, the additional area could ultimately comprise more area of habitat or other space for local amenity.
- The application was submitted in December ahead of the planning fee increase (December 6th) and not in effort to reduce engagement. The applicant would welcome an extension of time to ensure all outstanding considerations are suitably addressed ahead of determination.
- *The proposals are considered to be sustainable from an arboricultural point of view subject to the provision of the tree protection measures detailed within the Tree Protection Plans and all works being undertaken in accordance with the Arboricultural Method Statement. We welcome comment from EDDCs Tree Officer.*



As evidenced through the submission documents and demonstrated through the lack of progress in the locality, the delivery of the specific AH is extremely difficult due to, primarily, the lack of a RP supporting a proposal of this scale.

Many of the other concerns (NL, drainage, access/connectivity) present themselves elsewhere in Broadhembury, with a number of previous applications for AH having failed in the process and resistance to this proposal, which is considered to be well-thought out and justified, could condemn the locality to no delivery of much needed AH or a far inferior scheme in the future.

We welcome further engagement with both EDDC and CLT.

Kind regards,

Keegan Ferreday BSc MSc MRTPI

Planning Director

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