

Attachment to the minutes of a meeting of Broadhembury Parish Council held on 21st January 2020.

Item 8 Neighbourhood Plan Update

The Chairman introduced this item and said that he and Mrs McArdle (a member of the Neighbourhood Plan Steering Group) had been in discussion with EDDC about the chapter in our Neighbourhood Plan called; *A Balanced Community*. In view of the complexity of the issues and the fact that many members of the PC had not been elected when the process had started he intended to explain the history at some length to clarify the current position. The explanation would be summarised in detail as an attachment to the minutes and the attachment would form the agenda for a further meeting specifically on this subject.

In 2012 EDDC invited Parish Councils to carry out a SHLAA exercise. Every few years District Councils are required to conduct a strategic evaluation of potential land availability for development the PC was asked to rank the suitability of sites using criteria. The criteria are as clear and quantifiable as they can be but to a certain extent an element of judgement is involved. There had been earlier exercises but this was the first occasion when the PC was involved.

BPC was asked to rank four sites: opposite the Memorial Hall, adjacent to the Memorial hall, opposite the Old Chapel and at Causeway End. Only sites notified to EDDC could be considered and the PC carried out the exercise using criteria determined by EDDC. On that basis the site opposite the Memorial Hall was considered in principle as the one which best matched the criteria. At that time Broadhembury village had a 'built area boundary (black line) and proximity to services was a weighted criterion. A public meeting was held in 2012 at which the result was explained and supported.

When work started on the Neighbourhood Plan in 2013, research to support its development identified a need to provide housing for both young people who wished to remain in the Parish and older people who wanted to 'downsize' but remain near to the community of which they felt part. To respect this, the NPSG drafted a chapter in the NP titled ' A Balanced Community' and identified the site resulting from the SHLAA exercise as a location where 'affordable' housing could be developed.

In subsequent public meetings the community made clear that the development of housing on that site was unacceptable. The PC surveyed residents of Broadhembury village and this was confirmed. Whilst residents were not opposed to 'affordable' housing they did not want it at the entrance to the village nor did they want the volume of commercial housing which would be required to subsidise the 'affordable' element.

At a public meeting in Kerswell Priory at the end of 2016 it was suggested that affordable housing would not be opposed in the hamlets which make up the parish, subject to further discussion, and that this policy should be pursued in discussion with EDDC. Although it was pointed out that the hamlets (Kerswell, Dulford, Luton, Colliton) would not under regulations then current qualify as sufficiently close to public services (defined below) the Chairman agreed to open discussion with EDDC to see if progress could be made. This

decision had resulted in a series of meetings with EDDC and the decision which now had to be made because the discussions had reached a definitive stage.

Over the period in which the Neighbourhood Plan had been drafted and amended there had been a series of District and national policy changes which had subtly influenced the view of EDDC about our aims.

East Devon Local Plan was formally 'adopted' in 2016. It includes Strategy 35 which provides that :'*exception site mixed affordable and open market housing schemes at villages outside of Built-up Area Boundaries for up to 15 dwellings will be allowed where there is proven local need demonstrated.....etc'* (by an up to date needs survey). These cases are called 'exception sites' (15.23/24 EDDC Local plan 2013-2031) .

National Planning Policy Framework, redrafted three times during the life of the NP process sets out in the Feb 2019 document ; '*local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing....'* (Para 77) and: '*where there are groups of smaller settlements, development in one village may support services in a village nearby'* (para 78 NPPF 2019).

Perhaps conscious of this national guidance EDDC had recently published its Affordable Housing Supplementary Planning document in draft consultation form. This elaborates on Strategy 35 in the Local plan and states (6.12); '*rural exception sites should be close to a range of community services and facilities meaning at least four of the following '.....(school, pub, village hall, shop/PO, surgery, place of worship and public transport).*

Broadhembury village has five of this list. The document continues (6.13):' "*close*" should mean that these services and facilities can be reasonably accessed by future residents preferably by walking, cycling, or public transport in order to minimiseetc'

Clearly development in the hamlets of the Parish would enable access to the services by cycling or in some cases walking.

Before this was published the NPSG had attempted to redefine 'close' in terms of time rather than distance but this had not been agreed. In the latest discussions EDDC have said that given a choice of sites they would prefer the closer one to services, but they would now consider exception sites in the hamlets subject to conditions (evidence of need, proportion and number of affordable, local consultation , location and design etc). However we could not exclude consideration of a site in the village as well even if it was not favoured by local people.

The policies in the NP had been redrafted and these would be incorporated into a total redraft of the chapter. In summary BC1 and 2 remained unchanged but a new BC3 now included the old BC3 and 4. The supporting justification still had to be reformed from the original text.

The Chairman concluded that he saw the options for the PC as follows (not in order of preference):

1. To remove any reference to the need for 'affordable housing' from the NP totally. However this would not prevent a developer carrying out their own need survey and submitting an application accordingly, nor is it true to expressed need.

2. Stop all further work on the NP and accept that it could not be concluded with agreement thus giving up any benefits of the process and leaving the Parish with the protection of District and national policy alone.
3. Enlist the help of our MP to press our case. But he cannot change the Local Plan or planning guidance so the outcome is likely to be little different.
4. Formally endorse the AONB design guide (now incorporated in the draft) which gives some control over the design characteristics of development. This draft amendment needs to be formally endorsed by the PC if we agree to the proposal.
5. Set up a pre-emptive Community Land Trust to develop affordable housing for the local community (ie people with a strong link to the Parish in the first instance)in perpetuity. This could only happen without a commercial element if the land was gifted by a local landowner of a site as close as possible to services. There would be conditions (and a lot of work) but there are successful precedents locally .

The Chairman went on to say that he personally favoured option 5 which could be 'beefed up' in the NP. Whilst he thought it would prevent other applications for development (because affordable housing needs would be covered at least until 2035 and beyond) he pointed out that the Parish affordable housing need was assessed in conjunction with the adjacent parishes of Plymtree, Awliscombe and Payhembury and he was unclear how this would influence the discretion with which our parish could operate.

There would now be a period of public discussion and consideration to decide on the way forward for which this detailed minute will form the start point. After this the whole NP document would need to be tidied up (assuming this is chosen as the way forward) , a 'compliance statement' (setting out the Local Plan and national Planning policies with which the NP complies) redrafted and updated, a new 'sustainability appraisal' written (removing any reference to the SHLAA site) and a ' communications statement' written (setting out the history of public consultation on the document). Before the NP goes forward to 'inspection' and then public referendum these documents would need to be produced.

He concluded by saying that he was optimistic that the process could be concluded and a strategy developed which would safeguard the interests of the community for the foreseeable future.

Minutes drafted by Chairman BPC for approval at following meeting
Jan 2020