

## **BROADHEMBURY NEIGHBOURHOOD COMMUNITY LAND TRUST**

### **TRUSTEES' RESPONSE TO ISSUES AND OBJECTIONS RAISED REGARDING 'PERMISSION IN PRINCIPLE' APPLICATION TO BUILD FOUR AFFORDABLE HOMES.**

For the purpose of this communication the objections submitted on the EDDC planning website have been divided into two sections:

#### **Firstly:**

some comments on how we would seek to avoid or mitigate any foreseeable issues with those aspects of the project that are scrutinized by the Planning Department, AONB and Highways as part of the overall planning process :

#### **Detrimental to the environment and hedgerow**

*We note that some concerns have been raised about destruction of the hedgerow. There is no plan whatsoever to damage or remove the hedgerow and indeed the Planners would be looking for maximum screening, with which we fully agree, so this threat does not really exist.*

*Apart from the rigorous environmental preservation conditions that would be demanded at any event by the Planners and AONB consultants, BNCLT's concern for safeguarding our environment is clearly expressed in our Vision and various other communications. If we were unable to meet the strict environmental demands of the Planners and AONB, there is no way the project would receive Full Planning permission.*

#### **Topography**

*While there are challenges, they are by no means insurmountable. First, it should be noted that the area of any housing built would be less than half the size of the plot as indicated on the application. The visual impact would, therefore, be only half as much as some might fear. As it stands the orientation of the housing has not been decided - advice would be taken from all parties to minimise the visual impact for immediate residents - but one possibility might be to position it at right angles to the road.*

*No work has yet been undertaken on building design or a site plan: we are simply exploring whether a project here is feasible at all.*

#### **Run off**

*This would receive full consideration not only from the project design team but especially from the Environment Agency and Planning/ Building Regulations officers. It is inconceivable that Full Planning would be awarded if this could not be satisfactorily addressed.*

#### **Flooding**

*Please refer to the paragraph above.*

#### **Increase in Traffic**

*We are a small village and any additional housing and car ownership - even for just four homes - can be expected to affect all areas of the village to the same modest extent. Just consider, however, how Affordable Homes funded by a commercial development of perhaps ten or 12 larger homes opposite the Millennium Hall, would impact on traffic in our village.*

#### **Disruption from building work, materials deliveries, etc**

*It is not unusual for Planning authorities to make it a condition that this work is only carried out within specified hours on specified days, for example, to preserve tranquillity*

*at weekends and in the evenings. In building terms, this is not a major project and certain aspects can almost certainly be prefabricated off-site; the building work can be considered as relatively short-term.*

### **Parking**

*Onsite parking would certainly feature in our plans, ideally out of sight behind the new affordable homes.*

It is important to reiterate that, at this stage, no design proposals have been submitted and BNCLT is entirely open to all and any suggestions from the community about other mitigating factors that might be integrated into the plans. We will be taking detailed advice on the first stage of the process from all the departments listed above in order to ensure minimum impact on existing residents, the ecosystems and existing built environment.

### **Secondly,**

In response to the points raised relating to the BNCLT'S actions and choice of site:

**The needs survey results have only just been made available on the PC website, therefore the shortness of time has led to a lack of consultation.**

This is sadly correct and is the main contributing factor to the unfortunate situation we find ourselves in. If the survey had been initiated with less haste, the CLT would have had more time in which to establish itself and its membership, thus being in a far better position to consult before applying for the PIP.

However, with the encouraging growth in membership as well as the breathing space that the PIP might buy us, consultation will of course be very high on our agenda.

**The needs survey identified four houses, two of which were in Kerswell. If the CLT'S vision is 'build only where needed', then why not actively pursue the 2 houses in Kerswell?**

Correct. In the time we had available, we actively set out to identify potential Rural Exception Sites around the Parish with a view to short listing 21 sites down to a possible 4 realistically strong candidates. This we did and presented them to EDDC. They made us aware that the strongest contender for a Rural Exception Site in the framework to which we were working towards, was the one we ended up submitting. The overriding reason being that it was within 600 meters of the village services.

**Why has the proposed site been moved from the 2016 plan opposite the Memorial Hall?**

The last time this site was looked into in 2016, a survey of the villagers overwhelmingly rejected the idea of supporting any development on that site (60% - 40%), not least because it involved significant commercial housing development on the edge of our heritage village in return for providing a few affordable homes.

Our site selection process included this site along with some other old SHLAA sites in order to create a level playing field. However, they did not perform as well against the combined criteria we used which were; the Rural Exception Site and HELAS site selection and our own criteria based on the Vision and Mission Statements of the BNCLT.

**Important to retain the few green areas that are left within the village to preserve the natural environment and the character of our rural village....**

Absolutely. Green areas are identified in the Conservation Area Design Statement for Broadhembury as being important to the whole. The village is full and there are very few sites if any, that could be deemed suitable around it.

What is important though, is to recognize that building out from the village in fields with expansive boundaries could be asking for trouble down the line with the potential for unfettered development once a footprint had been established. Thus creating considerably more environmental and visual damage.

**Should we be building in an AONB at all?**

The PIP is within the Blackdown Hills AONB. The AONB recognizes the importance and special character of our natural environment, and thus any proposal would have to be scrutinized by the AONB Planning Officer and have to conform to their own Design Criteria.

**The dominating position, reorientation of the development....**

Because this is a PIP application, there are no plans, conceptual, outline or anything else for that matter. These are issues that if the PIP were to be granted, it would only be right that full consultation be undertaken by the community to address these issues before taking it to the next level.

**'It's a *fait accompli*' since there is no plan B.**

We do not see this as a *fait accompli*, this is the beginning of an exploration into avenues for providing the delivery of affordable housing for those in need in our Parish and it can only be endorsed with the backing of the members of the BNCLT. And the wider Parish Community.

**If the PIP is rejected, will that not create an opportunity for someone else to step in and put forward an alternative proposal that might create something far more undesirable? (email)**

Yes, that could well be the case and that is why it is so important to recognize that this PIP has been submitted in such a short space of time with that in mind. The overarching difference is that if our application goes to the next level, it will be the community that determines the outcome and not a developer.

**In summary**

What is very clear from the rejection of the potential site back in 2016 by the villagers and the concerns about this particular site, is that there is always going to be resistance and sadly disharmony in our community to this kind of approach of providing affordable homes. We need to ask: is the format for providing affordable housing using the Rural Exception Site criteria, whether on donated land or by using affordable housing simply as a tool to obtain planning permission for a market - led development, actually the right way forward to address our Parish's housing need or is there another way?

With over 100 BNCLT members now, we must surely have access to some good lateral-thinkers among us who might just come up with creative solutions to a conundrum that will otherwise never go away?

However, in the meantime this is the only tool we have in the box and unless there is anything else out there we have missed, we would ask you please to seriously consider the merits of this PIP proposal off the back of what you now know.

**Trustees of The Broadhembury Neighbourhood Community Land Trust.**