

1. The guidance note from the Inspector, has been studied and noting that the basis of the Examination is to consider whether the plan is sound, make this further representation to be considered together with my earlier submissions.
2. I do not believe that the plan is sound for a number of reasons but most importantly in my view ***it does not meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.***

2.1. There has been no objective assessment of development requirements for the settlements in the East Devon Villages Plan (EDVP).

2.2. It was acknowledged at the East Devon Local Plan (EDLP) hearings that no allowance had been made for unmet requirements of Exeter, yet it is estimated that approximately half of the occupied properties at Cranbrook have gone to meeting Exeter's need.

Cranbrook has been publishing a survey for a number of years and results from the feedback showed that the percentage of people moving to Cranbrook from Exeter was: 2013 – 61%, 2014 - 49%, 2015 - 48%, and 2016 – 47%.

3. The published Housing Needs surveys that have been carried out in East Devon were in connection with Affordable Housing schemes and unfortunately do not give an objective assessment of the total need. Using Devon Home Choice Criteria, vast numbers of local people wanting a house in East Devon, not able to buy at open market prices, are unfortunately not classed as “in need” so do not register their interest and consequently have not been included in the figures and understate the need significantly.

3.1. This was clearly demonstrated on a Community Land Trust (CLT) scheme in Beer that I was personally involved in. There were more than 30 families with a strong local connection, unable to buy or rent a house at open market rates that showed interest in the scheme, however, only around 25% qualified as being “in need”. The scheme of 7 dwellings went ahead with just 4 “affordable” dwellings meeting the Devon Home Choice Criteria with the other three sold to local families, unable to buy on the open market, on an equity share basis where they had 100% of the value to secure their mortgage but only had to pay 80% of the value.

4. The White Paper “**Fixing our broken housing market**”

<https://www.gov.uk/government/collections/housing-white-paper> published 7th

February 2017 states at para 1.30 “ *....that great weight should be given to using small undeveloped sites within settlements for homes where they are suitable for residential development.....expect local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up.....*”

4.1. Close examination of the EDVP will show that the Built-up Area Boundaries are drawn in such a way to exclude undeveloped sites and indeed much of the physically Built-up Areas.

5. 6.2 of the EDLP states “*growth is planned for the towns. Villages and rural areas will see lower growth.*”

5.1. Colyton is of course a town yet despite para 6.2 of EDLP no growth is planned for it. The Parish Council is much against development and has been for many years, hence the reason why there is no planning for any growth. The former Ceramtec factory is likely to create some windfall housing although it would be good to retain a substantial part of the site for employment use.

Colyton has suffered through the resistance to development and is getting less sustainable year by year with the loss of shops and other services. Of the housing built this century some 75% has been on exception sites and many would agree the majority on inappropriate land damaging both the character and setting of the Town

5.2. Villages and rural areas rather than having lower growth, have none planned.

6. 6.4 of the EDLP states “ *We recognise that without some development, geared around local needs, many towns and villages will increasingly become communities of the retired and wealthy commuters travelling even longer distances to work....Development, [particularly affordable housing and provision of jobs in towns and villages will help sustain, enhance and make them self-supporting places to live and work.....”*

6.1. Despite this statement the recognition has not been translated into the EDVP and could not do so without appropriate objective needs assessments.

7. Mr Thickett in his report of 15th January 2016 acknowledged that most Town and Parish Councils resisted rather than welcomed new housing and expressed doubt as to whether Neighbourhood Plans would bring forward houses but was swayed by the Council’s confidence that new housing would come forward through NPs and the fact that 887 of the 1123 allocated to small towns and villages had been built or had consent so failure to meet the delivery through Strategy 27 would not be a significant threat to the District meeting its overall target.
8. Mr Thickett was correct in showing concern and having studied the Neighbourhood Plans (NP) both Made and In Progress, it is very clear that the Council’s confidence was misplaced and very little housing is going to come forward with the majority of that which does restricted to “*affordable*”. Having been born, lived and worked in Colyton, I have a particular interest and their NP clearly sets out to restrict development, the evidence base is selective, much is out of date and inaccurate in many instances. There has been no meaningful consultation or objective needs survey. While I know this to be the case in Colyton, I suspect the approach is not untypical in the NP process.
- 9. When one looks at the monitoring report VP08 it will be seen that there are just 8 dwellings in total shown to be built in the 15 settlements with BUAB’s from 2021 through the remainder of the plan period. Without allocations and phasing this can be the only result, relying purely on windfall cannot be considered planning. Clearly the EDVP is not a plan that meets objectively assessed development needs nor indeed can it be considered *effective*, another soundness test.**

10. The Inspector states that she is not concerned with the EDLP but although by 2015 it was clear that around 50% of the housing at Cranbrook was meeting the need of Exeter, unfortunately the significance of this appears to have been missed by Mr Thickett. Had an appropriate adjustment been made for the loss of homes available to meet the needs of East Devon it would have made a fundamental change to the numbers required from the other Towns and Villages and that would almost certainly require allocations being made in the EDVP if the EDLP was to pass an updated robust soundness test.

11. The Government seeks to limit unplanned Development as stated in The Briefing Paper dated 14th June 2017 "Planning for Housing"

<https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN03741>

An objective view would consider the inevitable consequence of not basing the EDVP on objectively assessed development needs will lead to unplanned development and almost certainly do so within the EDLP plan period.

12. I have already made proposals in earlier representations for what action I think should be taken but summarise them below:

12.1. Carry out an objective needs assessment for housing for Colyton and the Villages of East Devon taking into account the White Paper referred to in para 4.

12.2. Make allocations to the sustainable settlements to cover the assessed needs resulting from 12.1 including those unmet for neighbouring settlements where it is reasonable to do so and consistent with achieving sustainable development.

12.3. Adjust the Built-up Area Boundaries to fairly reflect the physical Built-up Areas.

12.4. Amend the criteria A1 for defining Built-up Area Boundaries:

12.4.1. Boundaries should reflect the existing scale and core built form of the settlement but should also seek expansion to facilitate additional development in sustainable locations, respecting the settlement's distinctive character and sensitivity to landscape setting.

12.5. Re-examine the unsustainable settlements to see whether development could bring with it factors, such as a primary school that would allow some of those settlements to be reclassified.

12.6. Although perhaps outside of this Examination I would recommend that the Council commissions independent research on Cranbrook and establish exactly how much of the development is meeting Exeter's unmet need so that monitoring of the EDLP is truly accurate. Adjusting the figures to accurately reflect those that are meeting East Devon's need would allow a reallocation of the numbers lost to Exeter and that is likely to cover a significant amount of the need that will inevitably arise from the objective assessments suggested in 12.1.

A.J. Carthy 11th October 2017