



Devon

Campaign to Protect Rural England  
www.cpredevon.org.uk

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Mr A Thickett  
East Devon Local Plan Inspector  
c/o Programme Officer  
East Devon District Council  
Knowle  
Sidmouth EX10 8HL

Dear Mr Thickett

## Comments on the new evidence and submissions – September 2015

### Housing requirements update

#### 1) *Using DCLG 2012 based headship rates.*

Devon County Council have worked through the figures, using POPGROUP software and 30 year migration trends, to provide updated population and dwelling number requirements. The figures in fact lie between the DCLG 2008 and 2011 numbers that were used for the earlier work.

Now that the DCLG 2012 data are available, they should be used as they are the latest and most up to date, in line with NPPG. Edge Analytics discuss this in Section 2 of their report (psd2015t)

#### 2) *Sensitivity testing*

The additional work by Edge Analytics on sensitivity testing the Economic Assumptions is relevant and important, but the Council have ignored the information. The Understanding Data report (psd2015t) states in several places: "Compelling evidence was not presented in the Local Plan hearing to justify any significant shift away from the [core] assumptions". I disagree profoundly with this statement. There are sound reasons to modify the assumptions, which are discussed in the Edge Analytics report.

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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The Commute ratio of 1.11 was used in the Feb 2015 report. As was discussed at the hearings in July, it would seem logical that the drive for job creation, particularly at the Exeter & East Devon Growth Point with the emphasis on high quality jobs, would lead to a lower commute ratio. The inter-Census trend is for decreasing commute ratio, and it would seem reasonable to project this forward. The **CR2** scenario with an incremental decrease of -5% would seem to be supported by the evidence.

It would also seem reasonable and logical to use the Economic Activity Rates advised by the Office of Budget Responsibility (OBR) as the most up to date evidence available. This is represented by **EA2**.

**The most reasonable jobs-led (policy-on) scenario is therefore CR2 & EA2, using the DCLG 2012 headship rates.** This leads to a dwellings requirement of **723 per year (13,014** over the plan period).

There is a further element which has not been sensitivity-tested, which is the 549 jobs number calculated in the Ash Futures paper in Feb 2015 (psd2015e). This relies on an over-optimistic calculation of job creation at the Exeter & East Devon Growth Point, particularly the major sites at the Science Park, Skypark and Intermodal facility. I raised queries about this at the hearing in July.

The Skypark Development Partnership (Representor 7169) stated in their representations that job development has been slow: “the reality therefore is that it has taken 5 years to secure the first B1/2 occupier on the site suggesting the site will take at least 20 years to complete”.

We also heard at the July hearing that development of the Intermodal facility has stalled and is unlikely to come forward in the near future, and alternative uses may need to be found.

Therefore the job creation at the Growth Point is very likely to be lower than that predicted in the Ash Futures paper, and the total number of jobs is likely to be less than 549/year which has been used in all the Edge Analytics scenarios.

**The number of 723 dwellings / year should therefore be regarded as an upper limit, and a realistic figure would be lower than that.**

I therefore disagree with the Council’s continued use of the housing requirement figure of 950/year, which is not supported by the evidence.

### 3) *Phasing of the Projections*

It is not clear how the phasing of projections data in Chapter 4 of Understanding Data’s report has been calculated from Edge Analytics’ work. Presumably there is some additional work which has not been published, but in the absence of this, I must take the figures at face value.

The phasing of dwelling requirement and projected annual completion trajectory is shown graphically in the Council’s paper (psd2015s) Figure 1 on page 4. During the first part of the plan period up to 2020 the projected completions exceed the projected requirement very significantly – by about 500-600 per year.

This is of great concern. As the Council state, there is support in paragraph 47 of the NPPF for bringing forward some delivery from later in the plan period. However, if delivery far exceeds the need, or demand, the market is likely to be saturated and developers are likely to stop building and / or mothball sites and reduce delivery. There is then the risk that, with a housing target set at 950/year over the whole plan period, it will be difficult to show a five year supply of housing land, using standard methodology.

If the phasing projections are accurate, there may be a case for having a lower annual target over the early years of the plan, say to 2020, then a higher annual target for the rest of the plan period.

An early plan review to reassess need and supply will be essential.

### **Housing trajectory**

The Council's housing delivery paper (psd2015s) and appendices and Housing Monitoring Update give further detail on the up to date position on housing delivery. They have provided additional evidence on building rates that have been achieved, and that are likely over the plan period. They have confirmed they are using "suppressed low industry confidence rates", which is appropriately conservative, and that their calculations are compliant with standard SHLAA methodology.

I agree with the Council's position on this topic. Their evidence shows that there is sufficient housing land available. It is for the developers/builders to utilise the permissions and build at an industry-accepted rate.

### **Habitats Regulations Assessment Update**

I have no further comments on this.

### **Sustainability Appraisal**

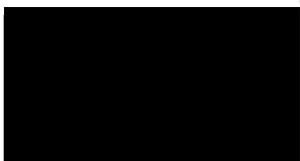
I have no further comments on this.

### **Other proposed changes**

Strategy 32 – Loss of buildings and land in community uses: I support the proposed changes.

Wind turbines - para 16.31 & 17.16 & Strategy 39: I support the proposed changes.

Yours sincerely



Dr Margaret Hall  
Chairman

