

# East Devon Local Plan

## Representations on Proposed Plan Changes and Council's Revised Evidence August 2015

Representor: 3215 Anthony James Carthy

### Introduction

**Further to the Council's letter dated 28<sup>th</sup> August to the Inspector, Mr Thickett, the papers that were attached under references PSD2015r,s,t,u,v,w,x and y have been studied and I have the following comments to make.**

### 1. Housing Numbers

- 1.1. At the additional hearing on 8<sup>th</sup> July it was acknowledged that Exeter had a substantial shortfall in their provision of housing land to meet the projected need but East Devon had not made any provision in their figures because they had not been asked to. Similarly West Dorset also has a shortfall and no allowance has been made for that.
- 1.2. It had also been reported to the Council that some 49% of the occupants at Cranbrook were from Exeter, which must clearly mean that, even if not designed to, Cranbrook is helping to meet Exeter's need rather than just that for East Devon.
- 1.3. That same report to the Council stated that just 28% of the Cranbrook occupants were from East Devon. Clearly projections must and do include inward migration but only a fraction of the 72% that is happening at Cranbrook.
- 1.4. There can be little doubt that Cranbrook and indeed the whole of the West End, because of its ideal location, will continue to meet the needs of Exeter and other adjoining districts and in my view the Council needs to recognise that fact in their figures and adapt the Plan accordingly.
- 1.5. The population is living longer with four generations in a family becoming quite common and more housing is required to cope with that to maintain the status quo, ideally, within the same or adjoining settlement. Yesterday it was reported that for the year ending June there had been a 12% increase in homeless figures for individuals and families which highlights the problem. As planned, East Devon, apart from the West End is not providing new allocations outside of the identified 7 Major Towns and surely that cannot be correct.

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### 2. Five Year Land Supply

The Council adopted the Sedgefield approach in calculating the 5 year land supply but had not made any allowance for the shortfall in the period up to 2012/13. The Revised Evidence has not made any change in that stance suggesting that 'Policy On' (jobs led growth) does not require the shortfall to be included; in my view that has not been justified. Depending on method of calculation the shortfall ranges from 1000 to over 3000, by no means insignificant.

2.1. The Council's figures include completions from October 2014. As we are looking at 'land supply' the historic completions should be omitted and replaced by projections for the period October 2015 to September 2020. This has two effects:

2.1.1. It will reduce the land supply numbers, as I interpolate the figures produced by the Council.

2.1.2. This makes the Council's figures more doubtful as it places a heavier reliance on sites that currently have outline or no consent, together with the questionable step change in volume in the West-End 2016-2020 delivery. My representation, answering the Inspector's Question 2(a) in the earlier consultation on Housing, referred to the Council's 2005 estimates of build rate at Cranbrook where these were proved to be wildly optimistic and I would suggest that the same over-optimism is contained in the current projections.

2.2. The most significant distortion on the five year land supply is the Cranbrook/West End effect.

2.2.1. The West End forms the major part of the land supply figures, however, as referred to in the Housing Numbers representation it seems very clear that the majority of houses will not be meeting the need of East Devon but that of elsewhere and therefore is significantly overstating the land supply figure.

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### **2.3. Recommendation**

It is considered that as proposed the Plan is unsound and unless amended, within a very short time it will be demonstrated that there is not a meaningful 5 year land supply. When that happens the Council will have to approve sites that would not be approved had a sound plan with sufficient housing allocation, being in place.

2.3.1. The 5 Year Land Supply calculations should be taken forward from October 2015 and not include historic completions.

2.3.2. The Plan should be amended to have separate figures for the West End from those for the rest of East Devon.

2.3.2.1. These figures should address both the housing need and the required land allocation.

2.3.3. Due allowance should be made for dealing with the shortfall from adjoining Districts in particular Exeter and West Dorset, it is known that it has had a significant effect at Cranbrook and should not be ignored.

2.3.4. The plan should revert to BUAB's for each settlement but these to be fully appraised and allocations for housing to be included where infrastructure permits or can be economically provided.

2.3.5. Colyton being very sustainable and a Local Centre, under Saved Policy S2, should provide a focal point for moderate growth. In the circumstances it should be added to the list of Towns where growth will be provided rather than included with the villages.

2.3.6. Housing allocations should ensure there is a full 5 year land supply with reserve sites allocated, as required, to ensure this will be maintained throughout the plan period.

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