

30 September 2015

Delivered by email ([programmeofficer@eastdevon.gov.uk](mailto:programmeofficer@eastdevon.gov.uk)) and post

**Representor Number: 3691**

Amanda Coombe  
Programme Officer  
East Devon District Council  
Knowle  
Sidmouth  
EX10 8HL

Dear Ms Coombe

## **RE: EAST DEVON LOCAL PLAN: ADDITIONAL EVIDENCE CONSULTATION**

Please find enclosed our representations in respect of the recently published additional East Devon Local Plan evidence, on behalf of Bloor Homes (South West) Ltd.

Previous representations regarding 'Housing' and with direct regard to the land that Bloor Homes control off Sidford High Street, Sidmouth were submitted in June 2015. The representations contained within this letter should be read in conjunction with those representations.

### **East Devon Housing Requirement**

The Council has submitted a number of additional evidence base documents responding to requests from the Inspector to undertake follow on work in relation to a number of specific elements of the Objective Assessment of Need evidence. This includes the following documents:

- East Devon 'Policy-on' sub-scenario (August 2015) – PSD2015t
- Demographics Understanding Data Report (August 2015) – PSD2015u

The Council summarised the implications of these evidence base documents on the Draft Housing Requirement within the Council Published *Housing Delivery Paper (August 2015, PSD2015s)*. On the basis of the evidence presented the Council is not proposing that the housing requirement be modified with the Plan continuing to accommodate the provision of at least 17,100 new dwellings over the period 2013 to 2031.

The updated evidence base includes a re-modelling of the 'Policy-on' population projection scenario using the household formation rates within the 2012 Sub National Household Projection (SNHP) dataset, which was published in February 2015. This was identified within representations<sup>1</sup> submitted by Turley on behalf of Bloor Homes (South West) Ltd to the Proposed Changes Consultation (June 2015) as an important

---

<sup>1</sup> Representor number 3691 – Responses to consultation 16 April to 12 June 2015

10 Queen Square  
Bristol  
BS1 4NT

T 0117 989 7000 [turley.co.uk](http://turley.co.uk)

update to ensure alignment with the Planning Practice Guidance which recognises this dataset represents the 'starting point' for understanding housing needs.

The updated modelling presented in *PSD2015t* suggests that the derived dwelling requirement from the 'core Policy-on' scenario is 943 dwellings per annum. This evidently shows strong alignment with the draft housing requirement planned provision for a minimum of 950 homes per annum.

Turley's previous representations also highlighted that: '*...it is also important to recognise that the 2012 SNHP is likely to extrapolate forward recent lower household formation rates for younger households reflecting the findings of the 2011 Census and the impact of worsening affordability in the area.*'<sup>2</sup> This reflects the PPG which asserts that:

*"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply."*<sup>3</sup>

It is evident in the Council's own evidence<sup>4</sup> that the authority has seen a persistent history of under-supply and evidence of sustained affordability issues, with this reasserted in Turley's representations<sup>5</sup>. It remains a concern that the updated evidence has not sought to consider the need for any adjustments relating to this aspect of the modelling which is linked to the consideration of market signals. The only indication as to the application of different headship rates is limited to modelling outputs using the 2011 Interim and 2008 SNHP datasets, neither of which are considered appropriate in the context of the more up-to-date 2012 SNHP dataset. In the absence of any sensitivity analysis it is of note that the application of the 2008 SNHP headship rates for the 'core Policy-on' scenario implies a need for 981 dpa. A more positive response to adjust headship rates to recognise a return to more sustainable market conditions would be likely to suggest a higher level of housing need associated with the projected population underpinning the Council's OAN projection than that currently planned for.

The Council's updated evidence, whilst not considering sensitivities in relation to headship rates, presents a number of variant scenarios relating to the scale of projected population growth associated with supporting the job growth anticipated in the Plan. These variant scenarios consider a range of different labour-force assumptions considering alternative future adjustments to economic activity rates and commuting.

The inclusion of a range of scenarios which seek to highlight the implications of changing commuting rates is not considered to contribute positively to the evidencing of need in East Devon to inform the Plan. The Exeter Housing Market Areas Strategic Housing Market Assessment (SHMA)<sup>6</sup> confirms that East Devon does not represent a self-contained housing market area (HMA) geography. Adjustments to the relationship between workers and jobs will evidently have an impact on the other authorities within the wider HMA. Two of the scenarios considered, which imply lower levels of housing being required, assume

---

<sup>2</sup> Paragraph 4.14 of the Proposed Changes Consultation Response document (Representor number 3691)

<sup>3</sup> [http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/#paragraph\\_015](http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/methodology-assessing-housing-need/#paragraph_015)

<sup>4</sup> Exeter Housing Market Area Strategic Housing Market Assessment – Final Report 2014/15

<sup>5</sup> Evidence of sustained under-provision of housing included in Section 4 of the Appended Paper to Turley's representations (Representor number 3691) titled 'East Devon Local Plan Housing Evidence Base Review' (June 2015)

<sup>6</sup> Exeter Housing Market Area Strategic Housing Market Assessment – Final Report 2014/15

that East Devon increasingly retains higher numbers of current out-commuters to work in the authority. It is evident that there has been no attempt to re-distribute housing provision across the HMA geography to reflect implied commuting adjustments. Indeed the opposite appears to be the case with concerns unaddressed regarding the extent to which the HMA, including East Devon, is planning to accommodate needs in full with the evidence suggesting unmet housing needs arising from Exeter in particular<sup>7</sup>.

The sensitivity scenarios presented in *PSD2015t* also explore the implications of assuming variant economic activity rate adjustments for the older cohorts of the workforce. This is considered to represent a useful sensitivity analysis with considerable uncertainty recognised in this area. The outcomes of the presented modelling, however, need to be considered in the context of the concerns related to the other assumptions in the modelling highlighted above and should not be viewed in isolation as implying a reduction in the modelled housing need associated with forecast levels of job growth.

Overall it is considered that the updated evidence provides a useful addition to understanding the scale of housing need over the Plan period in East Devon. In accordance with our previous representations and the points identified above with regards to the further evidence based submissions by the Council the draft Plan requirement to provide for 950 homes per annum should continue to be very much considered as a 'minimum' position and kept under review.

### **Five Year Housing Land Supply**

As set out by the Inspector (in his letter dated 31<sup>st</sup> March 2014), the Council must demonstrate a five year housing land supply at the date of adoption of the Plan. The Council has sought to update their position through a Housing Delivery Paper and associated appendices (Ref: *PSD2015s*).

The presented five year housing land supply calculations show a supply of either 5.08 or 5.39 years, depending on whether strategic allocation without permission and windfalls are included. As stated previously, based on the Council's figures alone, this is not a convincing five year housing land supply position. Through detailed interrogation it is likely that this figure would reduce to represent a shortfall.

Set out below are comments and concerns relating to different elements of housing delivery and supply, and the overall calculation of the five year housing land supply.

### ***Non-implementation/Slow-rate of delivery***

The Council continues to include all planning permissions in their trajectory and has in the main suggested that they will come forward at a standardised rate of delivery. No allowance has been given for non-implementation, nor a slower rate of delivery, unless they have been informed otherwise.

The Council, through their own experiences should understand that the delivery of development can often come forward at a slower rate than originally expected or not even come forward at all. It is naive of the Council to not make an allowance and suitably plan for this to ensure that a five year housing land supply can be demonstrated and so that the District does not come under threat to speculative applications.

Taking into account the above it is suggested that Council should apply a 10% discount to take into account non-implementation or a slow rate of delivery.

---

<sup>7</sup> Paragraph 4.17 of the Proposed Changes Consultation Response document (Representor number 3691)

## ***Sites with 'acknowledge development potential'***

As included within our previous representations (dated June 2015), the contribution of sites which benefit from a resolution to grant planning permission, but are subject to the signing of a section 106 agreement should be carefully considered, as often they take longer to agree than expected.

This element also includes sites that are known to be available for development and which are considered to be policy compliant, but have no resolution to grant. It is argued that these sites should be totally discounted from the supply of housing as there is no certainty that these sites will come forward, let alone the rate of which they may come forward.

## ***Windfalls***

We acknowledge the Council's further consideration of windfalls and the appreciation that if the Council can demonstrate a five year housing land supply the past rates of windfalls would not apply as the past rates of windfalls were inflated by speculative applications, off the back of a lack of a five year housing land supply.

It should be acknowledged that windfalls are not a robust mechanism to meet housing requirements as they are unpredictable and effectively would be an increasingly declining resource if the Council maintains a five year housing land supply.

## ***Delivery of SANGS and the impact on the Five Year Housing Land Supply***

The Council has identified that 391 dwellings included within their supply calculation that could be affected by the delivery of mitigation measures relating to the Exe Estuary and/or Pebblebed Heaths SPA's. In addition, a proportion of windfalls will inevitably be affected, given the significant area of East Devon that falls with 10km of either of the SPA's. The Council has suggested that half of their windfall allowance could be affected (i.e. 175 dwellings), resulting in a total amount of dwellings which could be affected as 566.

The result of the required SANGs mitigation not being delivered in a timely way could have serious implications on the five year housing land supply of East Devon. The Council considers that they could demonstrate a five year housing land supply even if these sites were affected. However, with other impacts on the supply, such as non-implementation or slow delivery of sites, it is likely a five year housing land supply would not be able to be demonstrated.

## ***Five Year Housing Land Supply Calculation***

We agree that that the Council should apply the 20% buffer to the five year housing land supply requirement (as set out in Paragraph 47 of the NPPF) and the Sedgfield method applied to calculate the five year housing land supply.

## ***Summary***

Based upon the above, we are still concerned that the Council will not be able to not robustly demonstrate a five year housing land supply at the point of the adoption of the Plan. In this context, the Council needs to allow for further deliverable sites to come forward in the short term, to assist in demonstrating a five year housing land supply.

The land which Bloor Homes control at Sidmouth is demonstrated to be suitable for residential development through the Promotional Document submitted with our representations in July 2015.

Yours sincerely



Sarah Griffiths  
**Senior Planner**

[sarah.griffiths@turley.co.uk](mailto:sarah.griffiths@turley.co.uk)