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O'ROURKE

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Sent by email

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Our Reference: 227601B

Dear Amanda

Additional Hearing 8 July 2015 – Housing

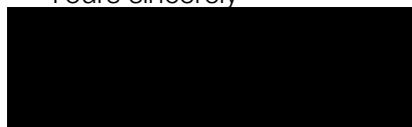
**Comment on East Devon District Council's Further Work / Evidence
Following the Hearing**

Gleeson Strategic Land

Further to the invitation of the Inspector I attach comments on the Council's latest submissions, with a particular focus on the Housing Monitoring Update paper to March 2015, dated August 2015.

I trust that these comments can be forwarded to the Inspector.

Yours sincerely



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Technical Director

cc Rachel Scott Gleeson

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Comment on East Devon District Council's Further Work / Evidence Following the Hearing

Housing Requirement

We remain concerned that the plan period fails to align with the evidence base. The Council has provided no explanation as to why this should be the case.

Whilst the further work on the Objectively Assessed Need (OAN) identifies a 'core scenario' housing requirement of 943 dwellings per annum (dpa) and the covering report states that the local plan identifies an OAN of 950 dpa, the additional work still fails to justify the core scenario in preference to other scenarios which identify that the OAN could be higher.

Further, the local plan requirement still fails to ensure that the backlog of need (i.e. accumulated shortfall) is addressed in the first five years of the plan. The work by Understanding Data (report ref PSD2015u) fails to address this point, looking only at future job creation rather than suppressed demand.

PSD2015s

Housing Monitoring Update paper to March 2015, dated August 2015

The Council is claiming it can now demonstrate a five-year housing land supply when only a few months ago it was some way short of the required supply position. Gleeson recognises that a number of permissions have been issued in recent months and that build out rates have also increased, which has helped to improve the land supply position. However we would note that sustained levels of completions at the rates anticipated by the Council in one location (Cranbrook) are unsupported by the Council's own evidence (Market conditions model for calculating housing delivery rates).

Similarly Gleeson recognises that following the 8 July hearing the Council has taken a more critical look at rates of delivery from the larger sites. However, given the requirements to deliver SANG in a number of cases, prior to occupation – in line with the amended policy – means that the Council remains over-optimistic in terms of the lead in times for delivery. We also note the Council's comments in response to the Natural England objections that a number of the sites / urban capacity may not deliver, but do not see this reflected in the trajectory. We do not consider that the evidence satisfactorily addresses our previous comments, and similar queries by others, regarding the deliverability of the supply.

The most significant change in the calculation is that the Council previously accounted for the accumulated shortfall in provision when measuring completions against the Regional Spatial Strategy (RSS) housing requirements. Now the Council has re-set the clock from 2013 using the new Strategic Housing Market Assessment (SHMA) on the basis that the Council considers that this approach takes "*a more accurate account of past under-provision when projecting our needs forward*"¹. However, as noted above, the SHMA has not sought to address shortfall in the first five year of the plan period. It has

¹ Paragraph 2.5 of the Five Year Housing Land Supply report to EDDC Development Management Committee, 8 September 2015.



annualised the OAN across the plan period – which does not even extend to the full period of the SHMA. The situation remains that the annualised OAN does not account for the backlog and address under-provision in the way required by the National Planning Policy Framework. The additional information provided by the Council does not provide comfort that the approach is sound, particularly given that the lack of supply over preceding years will have inevitably affected the projections. Suitable adjustments have not been made.

The Inspector is currently considering the approach used to assess the past under-supply of housing and the implications for altering the start date for the plan period – and this was a matter of specific discussion at the recent hearing.

As a recap, the SHMA covers the period 2013 to 2033. The plan period is now proposed to cover the period 2013-2031. However, in not taking account of requirements and shortfall in the period 2006-2013 (which was originally included within the plan period) this backlog has effectively been written off and forgotten for the purposes of calculating five-year housing land supply.

The RSS annualised requirement for the period 2006-2013 (before the start of the SHMA period) is 855dpa. This is the most relevant, examined data for this period. Using the information from Table 9-4 of the SHMA, completions totalled 2,627 (2006-2013). The requirement over the same seven-year period was 5,985, creating an accumulated shortfall of 3,358 dwellings.

The Council has effectively written off this accumulated shortfall of 3,358 dwellings from its housing land supply calculations, which then allows it to demonstrate that it meets supply. The latest evidence produced by the Council fails to adequately address this issue.

PSD2015r

Report of Additional Work Following July 2015 Hearing Sessions

Commentary observations from EDDC officers (pages 13-15)

Point 10 and 11 – The Council clearly has some sympathy with the view that certain allocations and urban capacity may not be delivered. Whilst therefore may be some flexibility when considering only individual sites, the Council has not provided confidence that cumulatively (if sites do not deliver) there would remain an oversupply in provision across the plan period, particularly given that the stated over supply is marginal.

Point 14 – Payment of monies for SANG does not secure SANG provision *per se*. It is assumed that there would be some form of Grampian condition requiring SANG delivery prior to occupation, which would accord with the modifications to policy 'Strategy 47' suggested.

PSD2015w

Updated Sustainability Appraisal (SA), August 2015

The updated SA 2015 fails to take into account evidence submitted to the Inquiry in respect of Heathfield Manor, Honiton (SHLAA reference E156), which has also been subject to planning applications supported by landscape and visual assessment work. The SA summary for the site on page 357 overplays the



visual prominence of the site. Gleeson considers that sensitively located and designed development within the site can be achieved.

Omission Evidence - Affordable Housing

Gleeson further notes that the latest evidence does not address the overall concern that it has to the current distributional strategy, namely the need for additional homes at the towns. Despite discussion on the geography of affordable housing need at the hearings in 2014 and 2015, the Council has not issued any evidence about the scale of affordable housing need that currently exists at each of East Devon's settlements. Given that the nature of the affordable housing problem at the existing settlements is not fully understood, it cannot be confirmed that the plan provides a strategy to adequately address the geographical distribution of need.