

EAST DEVON DISTRICT COUNCIL
ISSUES AND OPTIONS CONSULTATION RESPONSE

PREPARED FOR EAGLE INVESTMENTS LTD

MARCH 2021



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1. Introduction

- 1.1 Thank you for the opportunity to comment upon the Issues and Options Consultation into the review of the existing EDLP, to cover the period 20121 to 2040.

- 1.2 In terms of plan strategy, we would like to take this opportunity to comment upon this and we therefore, in this report, consider matters relevant to a review of appropriate spatial strategy.

2. Overarching Comments

Clarity

- 2.1 In our opinion 'West End' needs defining on a map/plan. Currently it is used as an ambiguous/imprecise term. Spatial definition of this term/policy area is, in our opinion, necessary. The lack of clear definition creates a difficulty when interrogating completion records and undertaking plan monitoring work.

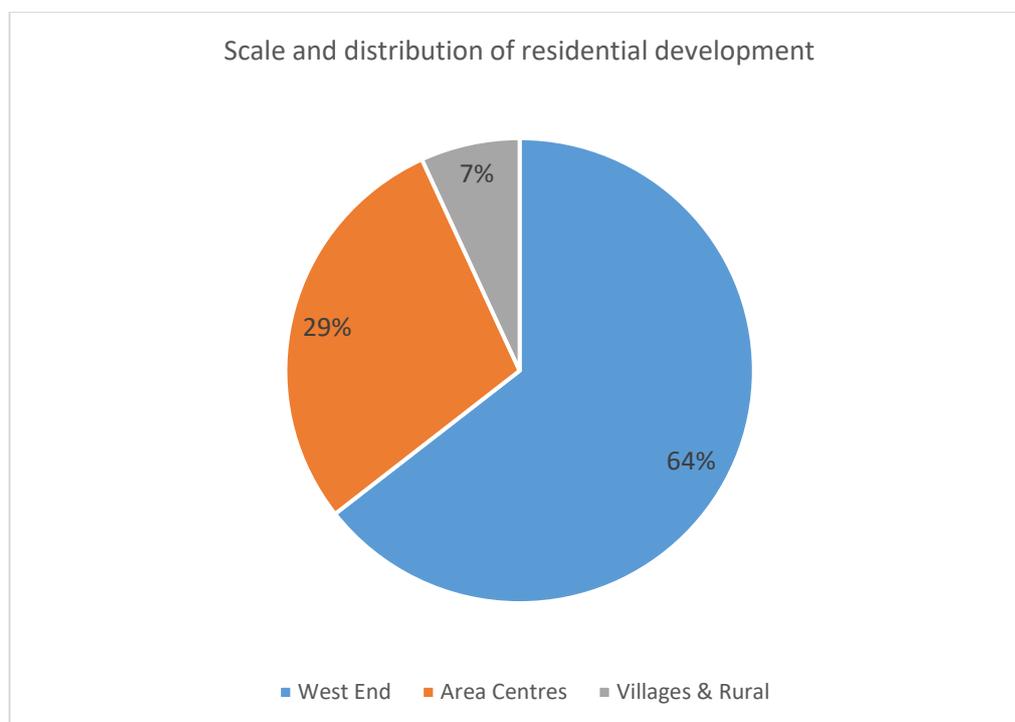
Co-operation and overall housing numbers

- 2.2 Whether, and to what extent, this local plan review should accommodate housing and employment needs that ECC can't meet is a matter that needs explicit and transparent consideration in this review. Failure to consider this matter effectively and explicitly may lead to problems with adopting the plan review in due course. Consideration of this matter should precede a consideration of the appropriate spatial strategy of the plan.
- 2.3 Thus, there is a 'duty to co-operate' point that needs to be borne in mind here. It is a matter of fact that the Exeter Local Plan (ELP) was adopted with a target figure of 12,000 new homes over the plan period 2006 to 2026. This figure was accepted despite the assessed need (at that time) being 15,000 new homes (that figure emerged via the RSS process and was designed to achieve a better alignment between job creation and housing). The Exeter local plan Inspector noted that there was no evidence that the 15,000 figure was inappropriate (see IR, paragraph 15). In this context the Inspector accepted Exeter City Council's 'environmental capacity' argument whilst expressing some concern about the target figure of 12,000 she accepted that the Council's proposed change to include the words 'at least' before the 12,000 figure was necessary (see also IR, paragraph 15). It is therefore a matter of fact that the ELP failed to make full provision for the level of housing required to appropriately align with job creation, at the time of its examination.

- 2.4 This has led to a shortfall in allocated provision in the sub-region.
- 2.5 In practice ECC have failed to deliver sufficient new homes to make satisfactory progress towards providing the plan target. Accordingly, the sub-regional deficit is a matter that this review cannot ignore, but that this Issues and Options paper (I&O) does not consider.

Meeting East Devon's Needs

- 2.6 The exiting EDLP embodies a new home delivery target of 'a minimum' of 17,100 new homes over the period 2013-31 (950 new homes per annum). This target was based simply on the housing needs of East Devon and made no allowance for the fact that Exeter City was not (as evidence has demonstrated) able to meet its' housing delivery target.
- 2.7 The existing EDLP (strategy 2) sets out the following spatial distribution: West End, 64%, Area centres, 29% and 7% to villages and the rural area. This spatial distribution pattern is set out in the pie chart below (figure 1).



Data Source: East Devon Local Plan 2013 to 2031

2.8 The initial strategy for the existing EDLP proposed a figure of 40% for the traditional towns of East Devon. The reduction to 29% prior to adoption of the existing plan was criticised, at that time, for starving (prejudicing) the vitality of the traditional towns of East Devon.

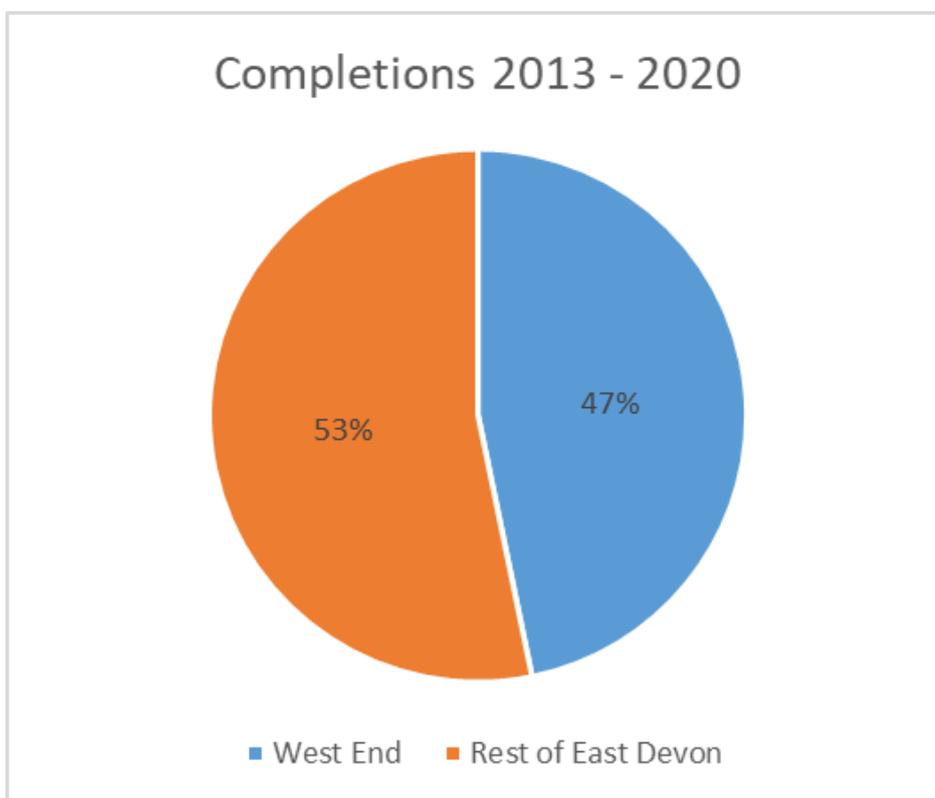
Development to date

2.9 Data published by the Council (in the Housing Monitoring Update [HMU] up to 31/03/2020) records the following level of completions:

- 3033 at the West End (47%)
- 3451 in the Rest of East Devon (53%)

2.10 This spatial distribution is shown in the diagram below:

HMU Completion Data (figure 2)

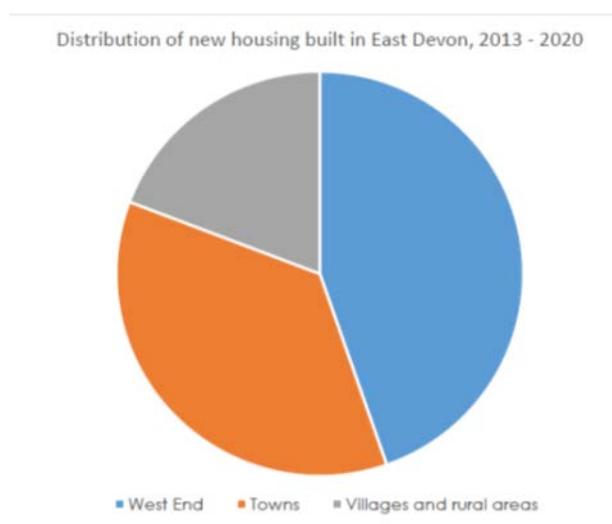


Data Source HMU to 31/03/2020

2.11 This delivery pattern clearly shows a lower proportion of West End completions than embodied within the existing DP (see figure 1).

2.12 A more specific geographical breakdown is set out (in diagrammatic form, at paragraph 13.5 of the I&O report). That chart is reproduced below for convenience.

I&O Consultation Reported Completions (figure 3)

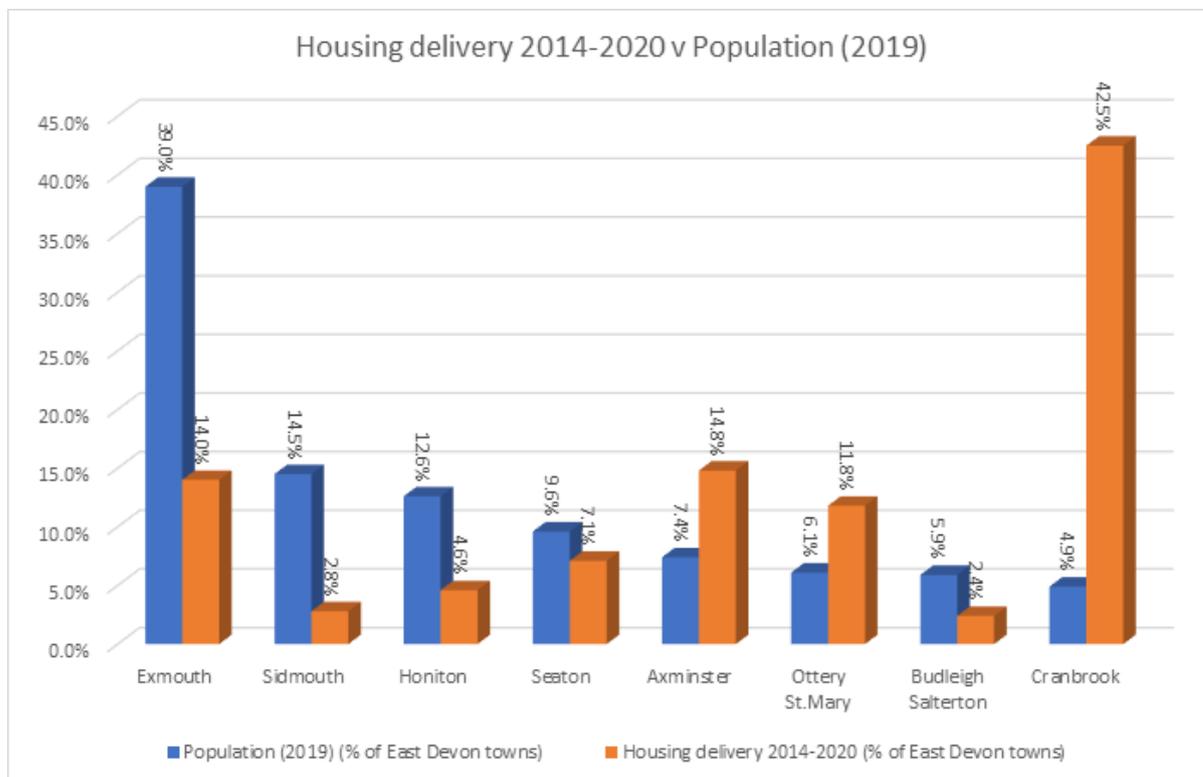


Source: EDDC Issues and Options (Reg 18) Consultation, page 48

2.13 This spatial distribution shows a surprisingly high proportion of completions in the villages and rural areas (see figure 3 above). This spatial delivery pattern is not in accordance with the provisions of the existing DP. It shows 44% of delivery at the 'West End' and some 20% in the villages. Both of these delivery outcomes are contrary to the spatial strategy of the EDLP. It demonstrates that rather than providing homes close to Exeter based jobs, a greater proportion than planned for have been provided in rural locations that are poorly served by jobs, services and public transport (i.e. not at the 'West End, nor at the traditional towns of East Devon).

2.14 What is also striking is that this data fails to correlate with the Housing Monitoring Update report (see figure 2). We therefore request clarification from the Council on this discrepancy (see attached letter requesting

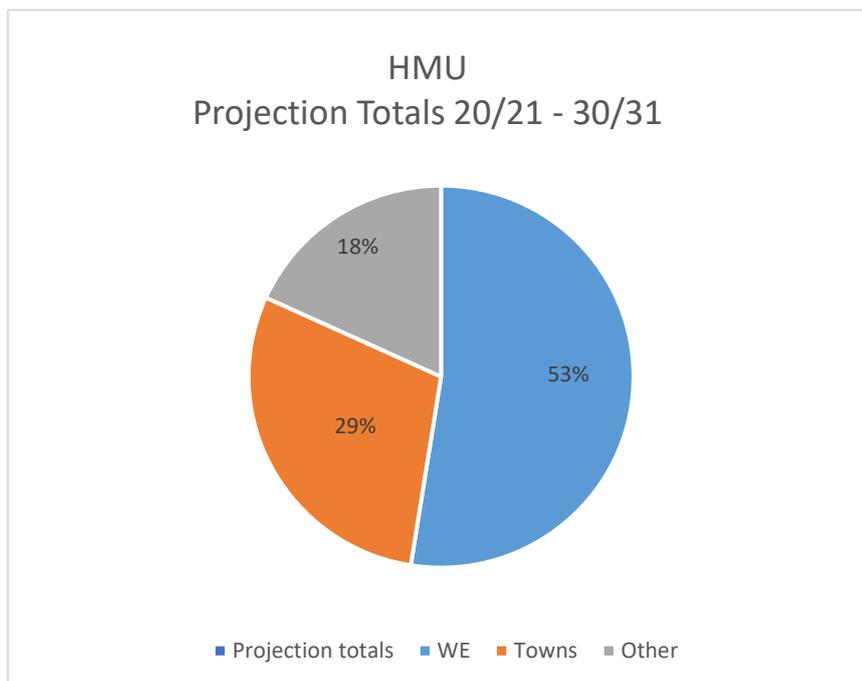
clarification from EDDC). In any event, whichever data source is correct, the fundamental point is that the spatial delivery pattern is not undermining the meeting of needs where they arise, and the vitality of the traditional towns of East Devon (as the bar chart below [figure 4] demonstrates).



Source: LDA (based on EDDC/ONS data)

Projected housing development 2020-2031

2.15 The data provided in the appendix to the HMU projects a development pattern over the period 2020-2031 that is summarised in the pie chart below (figure 5).



Data Source: EDDC HMU to 31/03/2020

- 2.16 We note the expectation set out in the Issues and Options paper that, over the period 2013-2031, around 59% of all new homes will be built in the West End (Issues and Options, paragraph 13.2). This doesn't appear to correlate with the available data (clarification sought in attached letter).
- 2.17 This variation appears to be the result of additional growth in the villages taking place at the expense of development at the West End, with development at the traditional towns remaining static (at 29%).
- 2.18 We wonder why this variation from the existing strategy is proposed and what justification underpins the increased level of growth in the villages and rural areas over and above the existing EDLP strategy?

3. Other Relevant Data

Affordable Completions

3.1 We have tried to understand whether the spatial distribution of new affordable completions mirrors the spatial distribution of new homes generally, but the data in the public domain on this subject is opaque (so we have requested this data from the Council – see letter attached as appendix 1).

3.2 We do know that a very high proportion of new affordable dwellings delivered in East Devon since 2013 have been at Cranbrook. Large amounts of Government funding was applied to the early phases of that development, and therefore relatively high proportions of affordable housing completions have been delivered. The ORS survey identifies that:

“One in five of those moving into new build properties had an income of less than 20k per annum. This rose to nearly a quarter of those moving into the Cranbrook area.” (paragraph 36).

3.3 That would seem to corroborate that (affordable housing influenced) distribution pattern i.e. the vast majority of new affordable completions that have taken place in East Devon since 2013, have been at Cranbrook. [data sought from EDDC to corroborate this – see attached letter]

3.4 It's also interesting to note that the recent 'East Devon Local Housing Needs Assessment' (ORS, October 2020) conducted a survey of new build dwellings. That survey identified (amongst other matters) that:

“Just over nine in ten (91%) are satisfied with their current home. Levels of satisfaction are considerably lower in Cranbrook than elsewhere in East Devon with only 29% being very satisfied compared with 55% overall;

Almost all (87%) are satisfied with the area. However, it is clear that levels of satisfaction are considerably lower in Cranbrook than elsewhere in East Devon with only 16% being satisfied compared with 44% overall;” (paragraphs 39 and 40).

3.5 It's therefore clear that Cranbrook appears to be struggling with social satisfaction in a way that other settlements in East Devon are not.

3.6 The HMU data on affordable completions conflates new build completions with properties purchased on the open market with those delivered via the planning system (and that are therefore restricted, via S106, from future open market sale). It appears that of the 320 affordable completions reported at least 64 of those are as a result of open market purchase. This means that some 256 units were delivered via the planning system (of 1065 total completions) circa 24% (again clarity on this matter is sought from EDDC).

Age Structure

3.7 The current EDLP states that:

"East Devon is characterised by an elderly population profile. This is most noticeable amongst the 60/65 plus age groups and reflects the popularity of the District as a retirement destination, especially the coastal areas. 28% of the East Devon population are over 65, compared with a South West figure of 20% and an England figure of 16%. The coastal towns of East Devon (Seaton, Sidmouth, Budleigh Salterton and Exmouth) have a particularly elderly population profile." (paragraph 2.5, page 12).

3.8 One of the key concerns associated with an overly 'Exeter focussed' spatial distribution strategy is that, having regard to the population structure of East Devon (with a relatively elderly population structure, compared to the national average), that this will become more striking at the traditional towns of East Devon.

3.9 That is to say that:

- There is a concern that at the commencement of the plan period East Devon was recognised as having a relatively elderly population.
- We know that the distribution current DP only sought to meet the housing needs of East Devon, and not to meet any Exeter under provision.

- We also know that the plan sought to focus growth near to Exeter.
- It appears that 'West End' growth has been typified by relatively high levels of affordable provision (relative to such provision elsewhere).
- It is often the case that new affordable homes are, to a significant extent, occupied by relatively young households (which is unsurprising since newly forming households is a key driver of identified affordable needs).
- It is therefore highly likely that 'West End' growth is typified by a predominately young age structure.

3.10 Whereas, at the traditional towns:

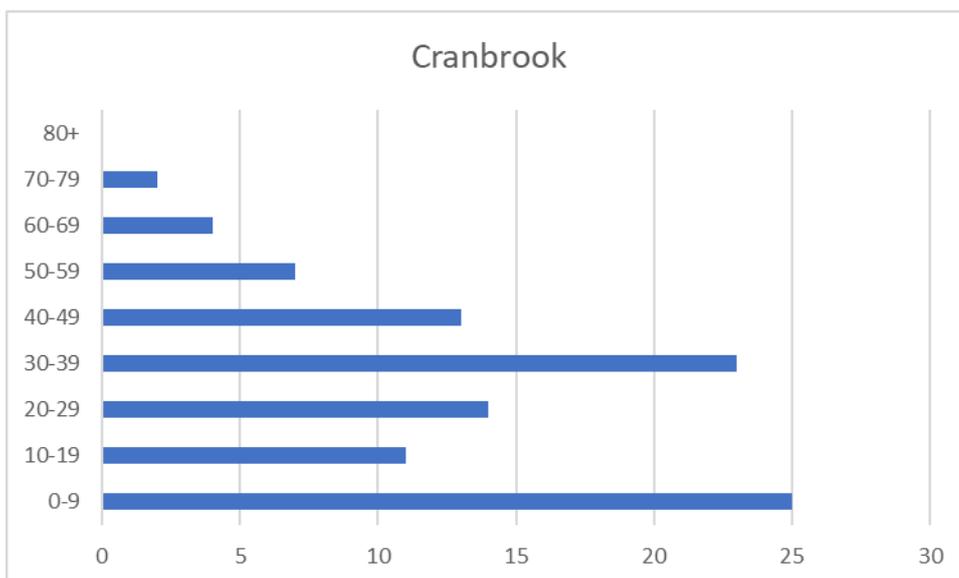
- There has been relatively small numbers of new homes.
- Often with relatively small numbers of new affordable homes.
- Meaning that these settlements (which are already relatively expensive areas to buy into (see CIL evidence base), remain expensive, and predominately affordable only to well-heeled retirees.
- Therefore the (already imbalanced) age structure becomes more imbalanced as the young are forced out (to destinations such as Cranbrook).
- This process exacerbates the elderly nature of the population of the traditional towns of East Devon, meaning that they become, more and more, retirement communities, undermining their vitality.

3.11 The NHS (Northern, Easter and Western Devon CCG) has observed that at Cranbrook:

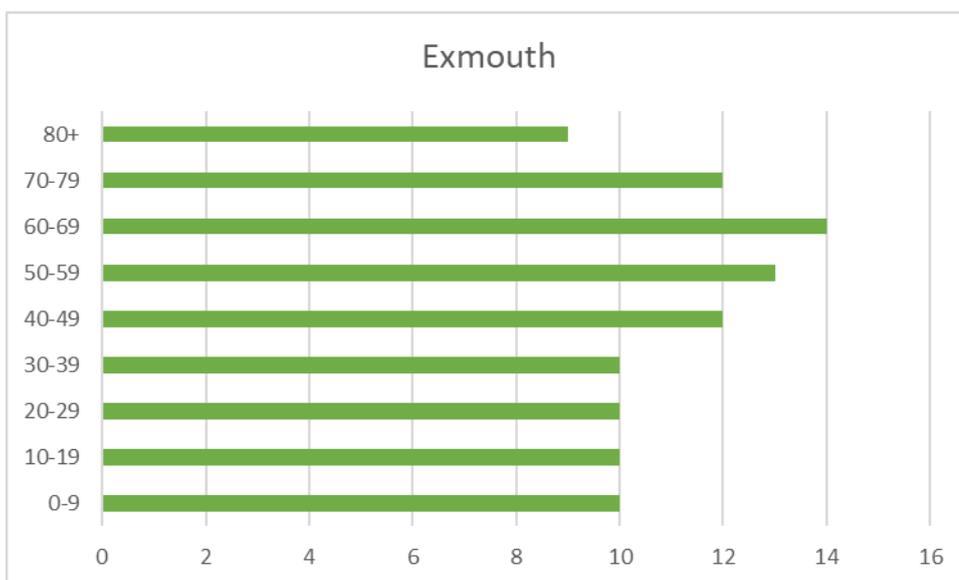
"The current population structure is unlike any other community in Devon, with an unusually extreme profile:

- *High proportion of adults aged 25 to 34*
- *Very high proportion of children aged under four*
- *Above national average proportion of children aged between five and 14*
- *Small proportion are aged 45 and over*
- *Very few above retirement age."* (Cranbrook – a healthy new town: health and wellbeing strategy 2016-2028, paragraph 2.2.2, page 10)

3.12 The charts below (figures 6 and 7) illustrate this problem



Data Source: Cranbrook – a healthy new town: health and wellbeing strategy 2016-2028, NHS



Data Source: Exmouth Community Profile, Devon County Council

3.13 The current EDLP distribution pattern represented a shift from the previous DP distribution pattern (which was based upon the traditional settlements and sought to meet needs where they arose) which had the virtue of ensuring that new development fulfilled a social cohesion role by supporting the vitality of the traditional towns of East Devon.

- 3.14 The current EDLP strategy has led to a situation where growth needs that emanate at existing towns have not been met at existing towns i.e. for example, it appears that affordable housing needs arising at Exmouth have been met by the provision of new affordable housing at Cranbrook. We consider this highly likely and have requested specific information from the Council on this matter (see attached letter).
- 3.15 'West End' provision and a higher than planned for level of development in the villages and rural areas has had the effect of impeding the traditional towns of East Devon from accommodating significant development.

4. Towards an appropriate spatial strategy

4.1 It therefore appears that the current spatial strategy is leading to a lack of social cohesion at the traditional towns of East Devon by:

- Not meeting affordable needs where they arise
- Residents of working age moving to Cranbrook
- The traditional towns becoming more and more inhabited by those of non-working age

4.2 The relevant facts plainly demonstrate that there is precious little development that has and will take place at the traditional towns of East Devon in order that the socio-economic needs that are presented by the existing population of those settlements can be met where they arise.

4.3 This matter is of particular concern since the spatial strategy of West End concentration is being undermined by additional development at the villages, rather than additional development at the traditional towns of East Devon where unmet needs are prevalent.

Town Focussed Strategy

4.4 Clearly there's a strong justification for a 4th spatial strategy option to be pursued through this review which is, namely *Town Focussed* i.e meeting the majority of new growth at the traditional towns whilst recognising that an element of growth needs to take place at lower order settlements, and adjacent to Exeter/West End.

4.5 Bearing in mind the spatial analysis that is presented in this report directing growth in this manner can be regarded as a necessary remedial action bearing in mind the relatively low levels of growth provided for at the towns since 2013.

4.6 It's high time that, over the period 2013-2040. the opportunity is taken to allocate a level of development to the traditional towns of East Devon that

will mitigate, to some extent, the negative effects that are starting to become evidentially apparent and that is undermining socio-economic health and social cohesion at those important settlements.

- 4.7 Exmouth, for example is the largest town in East Devon (Pop. 48,613) with an ongoing affordable housing requirement (which persistently fails to be met) and a need to maintain economic growth and vitality (which will not be achieved if housing supply to the town continues to be restricted). Neither the West End, nor the rural areas will service the needs of Exmouth in an acceptable manner. Recent trends mean that the vitality of town centres has been significantly undermined, and growth is necessary to support vitality of those areas.
- 4.8 We therefore conclude that Exmouth, as the largest town (by some way) in East Devon, needs to be a renewed focus for growth if its vitality and social cohesion is not to be undermined and young people are afforded an improved opportunity to access housing where they live.

APPENDIX 1

Our Ref DS/SJS/1894
Date 11th March 2021



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Dear Sir/Madam,

EAST DEVON DISTRICT COUNCIL ISSUES AND OPTIONS CONSULTATION RESPONSE

In preparing responses for our clients to the 'East Devon Local Plan 2012-2040 Issues and Options Consultation, January 2012 (Regulation 18)' document we have noted apparent discrepancies with data published by the Council in their 'Housing Monitoring Update to 31 March 2020' publication.

Those discrepancies cover the following subject areas:

- The geographic spread of completions from 2013 to date (paragraph 2.14 of our representations)
- The geographic spread of projected completions (paragraph 2.16 of our representations)

And,

- In relation to those new affordable homes (net of any acquisition of properties from the market) i.e. of those completions achieved from 2013 onwards, that are affordable completions (i.e. occupancy restricted via S106), a breakdown by geographic location (paragraphs 3.3, 3.6 and 3.14 of our representations)

We therefore request:

- Clarification why there are discrepancies between the data that the Council has published and clarification which data publication is correct?
- Publication of the affordable breakdown in a clear format.

We would be happy to meet with officers to deal with these requests if that is expedient.

Kind regards,



David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd

Enc