



Planning Policy
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

Date: 15 March 2021

Our Ref: LS M5/0107-21

By email only:
planningpolicy@eastdevon.gov.uk

Dear Sir/Madam,

RE: EAST DEVON LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

We represent the **South West Housing Association Planning Consortium (HAPC)** which includes leading Housing Associations (HAs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the South West region.

As significant developers and investors in local people, the HAPC is well placed to contribute to local plan objectives and act as long-term partners in the community. Our clients play an active role in affordable housing delivery in East Devon and so welcome this opportunity to contribute to the local plan.

We welcome the opportunity to comment on the Local Plan 2021 to 2040 Issues and Options Consultation and recognise its importance in being the first step in the production of a new local plan. The current Local Plan 2013-2031 was adopted in January 2016 meaning it is now more than five years old and out-of-date when considered against many of the revisions made to the National Planning Policy Framework in 2019.

It is encouraging to see that East Devon Council is preparing a new plan to account for these updates to national policy which will enable the delivery of much needed market and affordable housing across the district. The emerging plan has a 19 year plan period from 2021 to 2040. This is appropriate and in accordance with the NPPF.

Objectives, scope and background

Question 1 - Local Plan Objectives

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

We are pleased to see that the Council is looking to be ambitious with their housing policies in order to meet future housing need as stated in objective 3. A fundamental requirement of the NPPF is the responsibility placed upon Local Planning Authorities to "*significantly boost*" the supply of market and affordable housing. It is therefore critical for the Local Plan to ambitiously plan to meet affordable housing need across the District and we would like to see the objective recognise the specific need for affordable housing within the housing umbrella term.

The delivery of affordable housing over the plan period will be a key priority for the Council as a result of the level of need for affordable housing in the district. At para 5.4, the Council highlights the Opinion Research Services (ORS) housing needs report from October 2020 which shows that that if the Council were to meet all current and future affordable housing needs, there would be a requirement for around an extra 461 affordable homes each year between 2020 and 2040. The Council has acknowledged that this level of need is double that of delivery in recent years. In order to meet future need, the Council will

have to plan ambitiously and should maximise the chances for sustainable affordable housing delivery through a higher overall housing growth across East Devon.

Tackling Climate Change

Question 5 – Energy efficiency of new buildings

We welcome that climate change is high on the Council's agenda and the recognition that planning has a significant role in reducing carbon emissions by promoting sustainable developments. Objective 2 of the plan is to ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change. We therefore support option 1, plan for net-zero carbon from plan adoption, where the Council can justify such policies with robust viability evidence.

The housing associations of the South West HAPC recognise the critical role that they play in ensuring that residents have safe, secure and efficient homes that are future proof. Promoting sustainable development is the core objective of the plan system and it is important that all new developments continue to support this aim. However, we ask the Council to be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing in East Devon.

Meeting housing needs

Question 8 - How many new homes should we plan for each year?

Given the need for both market and particularly affordable housing across East Devon, housing policies should maximise the prospects of development across the district. Option 1 is not appropriate as it will likely not meet housing needs. The Planning Practice Guidance (PPG) says that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area, and that previous assessments of need can be taken into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests (Paragraph: 010 Reference ID: 2a-010-20201216). Understanding the results of the October 2020 ORS housing needs assessment, we therefore believe that East Devon Council should be looking to adopt a higher housing requirement figure than the 928 provided by the standard method.

This being said the housing requirement should be realistic and achievable; the Council should provide significant justification and evidence to support a higher figure such as those proposed in options 2 and 3. Housing requirements should ensure that the full range of housing needs are met, including specialist needs of the elderly; affordable housing and specialist housing. When drafting the policy wording, we would recommend the inclusion of the word 'minimum' before any housing requirement figure as it should be the minimum that the Council should be seeking to deliver.

Question 21 – Net gains in biodiversity

In order to gain biodiversity improvements which option would you prefer?

We suggest that Option 4 would be the most suitable approach to achieving Biodiversity Net Gain on residential development sites in East Devon. It also accords with what is being proposed by the Environment Bill. By allowing applicants to secure biodiversity improvements through a wider variety of options including on site delivery, securing the habitats locally and by using cash tariffs, the Council is helping to reduce the constraints posed to developers while enabling the delivery of development which will continue to deliver net gains for biodiversity across the district.

Question 27 - Retaining and refining the existing settlement hierarchy

Which of the following options do you prefer for a potential settlement hierarchy?

We suggest that option 3, a hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development, would be most appropriate. Future housing should be accommodated in sustainable locations across the district. This means that there should be a focus of

housing delivery in existing settlements with services and facilities. However, the Council should recognise the benefits of providing new development in smaller settlements in East Devon.

The Local Plan should support the delivery of affordable housing in rural areas subject to sites being a sustainable option for development in line with national and local policy. The Local Plan can help to facilitate rural affordable housing delivery by allocating sites for development within/adjacent to settlements in the settlement hierarchy that can sustainably grow. Small scale affordable rural housing developments can help to rebalance communities and help to keep families together whilst providing a boost for local services.

Question 32 – And finally ?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

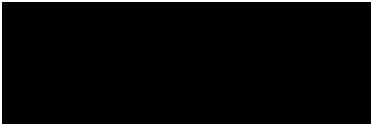
We notice that the Issues and Options consultation document contains very few references to the delivery of affordable housing; more specifically there is no discussion on the variety of tenures now available and the need that may be associated with these tenures. It is important that the Council plans for the need for affordable housing across East Devon in light of the revised NPPF, as these new tenure definitions will change the types of households whose needs will now be considered as requiring a form of affordable housing.

We would like to see the Local Plan recognise the role of housing associations in providing affordable housing in East Devon. It would be beneficial to see the Council recognise the role of housing associations and encourage developers to have early active engagement with housing associations in the next round of consultation. Early engagement enables housing associations to have an active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of HAPC members.

We would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people, particularly in rural areas. The Council may find it insightful to know that a number of the HAPC housing associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the local plans to support CLTs in their choice of sites.

The above comments are intended to be constructive, to ensure the policies are found sound at examination. We would like to be consulted on further stages of the above document and other publications by the Council, by email only to consultation@tetlow-king.co.uk; please ensure that the **South West Housing Association Planning Consortium** is retained on the consultation database, with **Tetlow King Planning** listed as its agents.

Yours faithfully



**LEONIE STOATE BSc (HONS) MSc
PLANNER**
For and On Behalf Of
TETLOW KING PLANNING

cc: Abri Sovereign
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