



Devon

Campaign to Protect Rural England  
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1 September 2014

Mr Mark Williams  
Chief Executive  
East Devon District Council  
Knowle  
Sidmouth  
EX10 8 HL

Dear Mr Williams

**Strategic Housing Market Assessment & Objectively Assessed Need**

I am writing to ask you to exert your powers to expedite the completion of the Strategic Housing Market Assessment and associated work that was requested by the Inspector to the Local Plan, Mr Thickett.

In Matt Dickins' letter to Mr Thickett of 22 August 2014 he was considerably more explicit than in his report to the Development Management Committee on 26 August 2014. He writes that the five SHMA authorities believe that "the full objective assessment of need isn't yet fully evidenced". In other words, the draft report issued in mid July by the consultants DCA is not yet fit for purpose and doesn't meet the requirements of the commissioning authorities.

In the Invitation to Tender for the SHMA issued in July 2013, the Draft Report was to be ready by December 2013 and the Final Report by early February 2014. This amount of delay is frustrating and unacceptable, and every effort must be made to speed delivery.

Furthermore, Matt Dickins states to Mr Thickett that he will be able to make a further report and update on the future work programme within two weeks. In the report to the DMC, he indicates that there is a considerable amount of work to be done prior to re-submission, i.e. months rather than weeks. We need to know the timescale and dates when a) the final SHMA will be produced, and b) the housing supply target and other work requested by Mr Thickett will be produced.

The NPPF and Planning Practice Guidance (final version published in March 2014, but draft guidance was available before that) lay down guidelines on how to objectively assess housing need. This has been further clarified by the Planning Advisory Service guidance recently.

“Objectively assessed need” is an evolving concept and the methodology is open to some debate, as discussed by PAS. It is therefore crucial for the SHMA to demonstrate clearly the rationale used for the assessment, and also to provide various scenarios as laid down in the PPG.


What is needed, and was requested by Mr Thickett, is a housing supply target figure which is based on up-to-date objectively assessed need, and with clarity about how the figures have been arrived at. This will enable a proper public consultation and allow informed representations prior to the re-convening of the Examination. Clarity and objectivity will provide the best basis for resisting challenges on OAN in the Courts post-adoption, as has happened to various other Local Planning Authorities.

It is worth noting that our neighbouring authority, West Dorset District Council, was asked by its Inspector in March 2014 to prepare a new SHMA. The work was completed by July, and a revised Local Plan published in August for consultation prior to submission.

A similar speedy response should be possible by East Devon District Council. I believe that the necessary work for re-submission should and could be completed by 31<sup>st</sup> October 2014.

The consequence of the delay is, as you know, that we still cannot demonstrate a five year supply of housing land, and thus housing policies are deemed out of date. This means that developers can bring forward proposals on sites which are not in accordance with the development plan, with a good chance of success. This is placing an intolerable burden on the villages and smaller towns of East Devon where many of these applications are sited.

Yours sincerely



Dr Margaret Hall  
Chairman, East Devon CPRE

cc. Mr A Thickett, East Devon Local Plan Inspector

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Dear Dr Hall

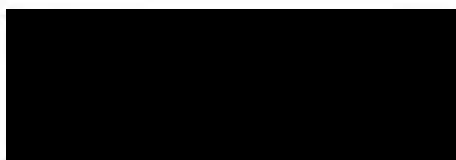
### **Strategic Housing Market Assessment & Objectively Assessed Need**

Thank you for your letter of 1st September 2014 regarding the completion of the Strategic Housing Market Assessment. As we discussed on the phone, all of the authorities who have an interest in the SHMA are working on what needs to be done as quickly as possible.

The result will be that all authorities hopefully arrive at a sound and robust position that meets their needs, promotes effective plan making and decision taking.

We shall endeavour to keep the public informed of our work programme as and when we have more information.

Yours sincerely



Mark Williams  
Chief Executive

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