

**From:** Planning Policy  
**Subject:** FW: Local Plan Consultation

---

**From:** chris wakefield [REDACTED]  
**Sent:** 12 January 2023 09:17  
**To:** PlanningEDDC [REDACTED]  
**Subject:** Local Plan Consultation

Dear EDDC PLanning-

Have tried to submit my reponse to the EDLP consultation documents, but the commonplace website won't let me in to the appropriate pages. I asked for support from them but got a message about stuff I should do at my end to try to get it to work. I use a new iMac running the latest operating system software - tried again this morning - still no go. I figure its not my job to fix deficiencies in their software, so maybe you're paying too much for outsourcing the consultation work. I'm sending my comments here and hope you can add them to wherever they should be at your end.

All Best

Chris Wakefield

Ottery St Mary  
[REDACTED]

## **East Devon Draft LOcakl Plan 2020-2040 - Consultation response**

Housing targets in EDLP draft 2020-2040 Local Plan

The general obscurity in the way that housing need is established means it is difficult to pass comment on the work set out for review in the consultation draft. The Local Plan policy formulation as a whole is somewhat a smoke and mirrors exercise, where house building predictions contrived in 2014 (updated 2016) are converted by the touch of the Standard Method wand into "evidence" supporting newer predictions calculated from the same base data. One has to assume that EDDC/HMG think people too disinterested to consider what is meant by terms such as 'evidence', 'need', 'affordable' and so on, and thus to accept what is put before us as competent analysis. This is far from the case - the 'evidence' of housing need is sheer flummery, designed to legitimise a specific policy choice - to build more houses no matter what.

The essay in support of the policy starts with a figure of 1,258 households in East Devon which 'are currently living in unsuitable housing and are unable to afford their own housing' (*ORS LHNA 2022* para 4, under the heading '*Establishing Current Unmet Need for Affordable Housing*'). This might reasonably be described as a 'crisis' in housing provision in East Devon. But it's a situation which might be on the way to a solution (if numbers alone are the issue) with the completion of those houses - 1,953 of them - about to be available (EDDC - *Housing Need, Supply and Requirement Interim Topic Paper*, p35, col.1 total). While accepting that numerical equivalence on its own is no basis for policy making, the total proposed level of new housing in East Devon, at 18,167 (about 1000 new houses every year) is inexplicable without an addition to the quantifiable social needs of a substantial market interest meet a ready demand in the open market. The conflation of 'need' and 'demand' is the source of the unsustainably high numbers proposed in the current EDLP.

Much of the documentation is thus dedicated to obfuscating this merging of need and want, which really should not have been presented by the planning authority as competent analysis and response to need. There is a lot of

finger pointing in the documents towards NPPF and HMG as the source of any troubling complexities in the current plan, so perhaps it is there we should look for a solution.

It is clearly unsustainable to build huge numbers of houses which simply load pressure on to local social services, adding to the needs to which it is proposed as a solution. It is also certainly is the wrong response to the climate crisis, which should be in the front of our minds in forward planning.

The plan has now been recalled I believe, in the face of broader environmental concerns, so I assume we shall look for a further consultation in due course with a revised approach. I am quite sure that the current version is inadequate, and the planning authority would be seriously remiss if it was pursued any further.