

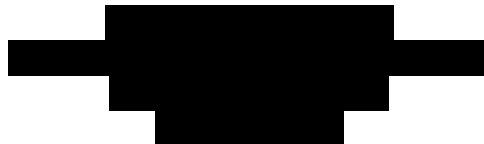


EAST DEVON LOCAL PLAN 2020 TO 2040
REPRESENTATION ON THE PREFERRED OPTIONS REG.18
CONSULTATION DRAFT PLAN

On behalf of

Mr R and Ms K Kenlock

Dated 13 January 2023



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1.0 INTRODUCTION

- 1.1 This Local Plan Representation has been prepared on behalf of Mr R and Ms K Kenlock in respect of the emerging East Devon Local Plan.
- 1.2 At present, within the winter 2022/2023 consultation draft of the East Devon Local Plan, it is considered the Council have failed to take full account of growth needs and allocate sufficient development at Honiton and as part of reassessing this consideration should be given to land previously presented by our clients.

2.0 HOUSNG AND EMPLOYMENT NEED

Housing Need

- 2.1 Policy 3 of the draft Local Plan states in branch 1 that ‘at least’ 18,920 dwellings will be delivered, with provision made for a headroom of approximately 10% to provide housing supply flexibility, which equates to provision of 20,800 dwellings. We agree with this approach in principle which complies with the Framework and at face value is a positive and pragmatic response to housing delivery.
- 2.2 However, Policy 2 – Housing Distribution sets out clearly within the accompanying table to the policy that 18,167 dwellings (908 dwellings) will be delivered over the new plan period – with additional windfalls totalling 2,335 dwellings (117 per annum), giving a total of 20,502 dwellings. Therefore, whilst this exceeds the standard method requirement, it does not meet the 10% headroom to ensure flexibility, choice and competition in the market required by the NPPF and falls short of the Policy 3 figure by 465 dwellings.
- 2.3 Paragraph 3.17 of the draft Local Plan then goes onto state that:
- ‘The policy requirement for provision of at least 18,920 dwellings in the district in the plan period is justified by evidence of local housing need based on the Standard Method, using the latest ONS statistics. To be sufficiently flexible and provide ‘headroom’, forecast supply in East Devon should be 10% above that figure. That equates to about 20,800 dwellings. At this time, **we forecast that there is potential to deliver approximately 20,441 dwellings** in the plan period from the supply categories we count towards meeting the requirement plus headroom. **This includes the potential sites being considered in policies 8, 17, and 19 – 26 in this draft plan.** The forecast potential supply meets the minimum housing requirement of 18,920 dwellings and would provide about 8% ‘head room’.’*
- 2.4 We note paragraph 6.7 of the Housing Need, Supply and Requirement Paper states ‘the reason for the small differences in completions and commitments in Table 1 compared to Table 2 is because Table 1 uses net supply figures (i.e. demolitions and other losses have been taken into account) whereas Table 2 (from the Strategic Policy in the draft plan) uses gross figures’.
- 2.5 We would suggest in any future iteration of the Local Plan, net figures are used, because gross figures artificially inflate the level of supply that will be achieved and would fail to meet the requirements of paragraph 11b of the Framework which states that ‘strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses...’. It would also fail to meet paragraph 35 of the Framework which requires plans to be positively prepared.

- 2.6 Based on the evidence in the supporting interim paper on housing need, this suggests that at least all 2nd choice sites listed in Policy 2 of the Draft Local Plan need to be allocated as well as including an allowance for windfalls. Given that even then this does still not meet the headroom figure of 10%, we suggest that additional land is required to ensure that choice and flexibility in the supply of housing can be made in East Devon. We would also question the detail of the Council approach as it is considered naming sites as 'second choice' is hardly transparent and members of the public may not recognise that these sites are no different from the first choice sites and are required to deliver the housing numbers required. This may result in reasonable comments not being made and sites that have unknown issues being allocated.
- 2.7 Although East Devon District Council have withdrawn from the wider Greater Exeter Strategic Plan (GESP), paragraph 2.10 of the East Devon Housing Need & Supply Requirement Interim Paper states 'nevertheless, there are times when strategic cross-boundary matters are relevant for plan-making. These can include the issues within the Housing Market Area and the Functional Economic Market Area, to which national guidance in PPGs relates. The Greater Exeter HMA is the same area as the Greater Exeter FEMA.'
- 2.8 We are pleased to see EDDC are considering adjacent authorities' housing requirements within East Devon Housing Need & Supply Requirement Interim Paper. However, whilst we acknowledge the cross-boundary working taking place, having considered the Exeter City Council's draft Local Plan, as part of the recently closed consultation we query the extent of land available to deliver homes in the City. It is therefore our view that EDDC will need to consider an uplift in housing numbers to accommodate some of Exeter's need, or at the very least have a contingency in place to react if that becomes clearer over time – i.e. potentially identify reserve sites to deal with such an outcome.

Economic Need

- 2.10 Work is still being undertaken on the Economic Development Needs Assessment (EDNA) and at the time of preparing the Housing Need, Supply and Requirement Paper in November 2022, this assessment had still not been provided.
- 2.11 As such, the Council is not yet clear on whether the results of this assessment will necessitate an increase in employment land delivery and also housing provision. Paragraph 4.10 goes on specifically to state "*The EDNA results will need to be integrated with the LHNA evidence at a later date. This will assess whether there is evidence relating to economic growth and the ability to house the work force to support the forecast number of jobs that would justify a Local Housing Need figure higher than the scale of housing need identified through the Standard Method.*"

2.12 Accordingly, we suggest this work is finalised as soon as possible to feed into the overall assessment of employment land provision and housing need. Without this work and the conclusions it will reach, we struggle to see how the Plan can progress any further than this stage given this could have implications for the level of both housing and employment allocations going forwards.

3.0 SETTLEMENT HIERARCHY

3.1 We have reviewed the proposed settlement hierarchy for development and agree with the general principles that it sets out, namely that larger scale development should be directed towards the larger towns first, which have a greater range of facilities. Lower levels of development should then be focused on smaller settlements, as the strategy in the Local Plan sets out:

'New development will be directed towards the most sustainable locations in East Devon, consistent with spatial strategy to:

- *Focus new development on the western side of the district, including a new town and other major strategic developments close to Exeter*
- *Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, **Honiton**, Ottery St Mary, Seaton and Sidmouth to serve their own needs and that of the wider surrounding areas...''*

(Own bold)

3.2 Paragraph 3.4 of the draft Local Plan *'a key part of the spatial strategy is to outline the settlement hierarchy, grouping settlements together where they share similar characteristics and placing them in different tiers. Settlements with a higher population and a greater range of jobs, community facilities and services serving a wide area are placed at the top of the settlement hierarchy; whilst smaller settlements that have fewer jobs and facilities perform a more local, but still important, role are grouped lower down the hierarchy.'* We agree with this approach.

3.3 We have reviewed Topic Paper 1a – Role and Function of Settlements (RFS) in respect to Honiton and broadly agree with the evidence that underpins the spatial strategy set out in the draft Local Plan.

3.4 Figure 2.1 of the paper provides a list of settlements with their population estimates and age profile – within Honiton, it is estimated that 55% of the total population (6,390 out of 11,548 people) is estimated to be of working age (16 – 64). Paragraph 2.11 states *"By far the highest number of working age people can be found in Exmouth with nearly 20,000, three times Honiton in second."* Whilst lower than Exmouth it is clear that Honiton is a very important location for accommodating the working age population of the district.

- 3.5 Figure 3.3 of the RFS paper states that of all residents aged 16 – 74 in Honiton, 70% are considered to be economically active. Paragraph 3.37 confirms that along with Sidmouth Honiton are the only two settlements in Tier 2 of the settlement hierarchy and these are second only to Exmouth which is the only settlement in Tier 1.
- 3.6 Therefore, we consider that Honiton is suitable to accommodate growth and we agree there should be a mixture of housing and employment land to promote self-containment of the area. In our view, this is compliant with the NPPF's requirement to 'actively manage patterns of growth' and focusing on 'locations which are or can be made sustainable'.
- 3.7 Overall, therefore, we are in agreement with EDDC's assessment of the suitability of Honiton for growth and its place in the settlement hierarchy.

4.0 PROPOSED POLICY APPROACH

- 4.1 The current strategy for the delivery of housing in the emerging East Devon Local Plan is for a large proportion of the required housing numbers and to a lesser extent the employment provision to be located at the western end of the district, in particular around Cranbrook and through the provision of a new settlement. Whilst such an approach is appealing at face value we would suggest it is not the easy fix that it may appear and that at present there is insufficient evidence to justify such an approach.
- 4.2 We consider that relying on a new town and major settlement expansion for the delivery of a large proportion of the Districts required housing is not without its risks and challenges. Indeed, East Devon District Council are currently unable to demonstrate a 5-year housing land supply largely on the basis of the behind schedule delivery of new housing at Cranbrook. We therefore consider that greater consideration needs to be given to meeting growth needs across a wider range of locations and that focusing attention on a new settlement may not result in the delivery of growth that is required to meet needs.
- 4.3 It is also clear that the provision of a new settlement will place a significant burden on infrastructure in both East Devon and adjoining local authority area and, in particular within the Exeter City Council area of administration and we would suggest that greater work needs to be done with regards to impacts on infrastructure beyond East Devon.

5.0 OPPORTUNITIES TO MEET GROWTH NEEDS

- 5.1 Our clients are the owners of the Former Honiton Show Ground which is listed as Site Honi_09 in the Sustainability Appraisal Report, November 2022 (SA). Having reviewed the SA it would appear that a blanket judgement has been made in respect of all the sites that fall within the Area of Outstanding Natural Beauty and it concluded that due to the designated status any development of these would have a significant negative landscape effect and that this is sufficient to warrant their exclusion.
- 5.2 We would contest this approach and do not believe that the evidence base has been prepared on a sufficiently detailed basis as it does not appear to consider the sites on the basis of their actual physical characteristics and the contribution they do or do not make to the AONB landscape.
- 5.3 We consider it plain that land on the edge of the existing settlement is likely to make a lower contribution to the AONB landscape. This rings especially true in respect of the Honi_09 which is fairly low lying and discrete within the landscape and within an area already characterised by infrastructure development. The site is also screened by existing vegetation on its most impactful west and northerly borders. On this basis, we contend that the site should not be so readily dismissed. This view is supported by the that Sites identified from the Call for Sites 2021 (all) and 2017 (non-strategic sites) part of the LPR evidence which assessed the site and factored in the constraints presented by landscape matters but which continued to consider the site potentially suitable for housing development of circa 41 homes. It is noted that the HELAA report indicates the land has not been promoted for employment led development but at the same time recognises that it has been confirmed the site is available for mixed use. It is therefore unclear from this what conclusions have been drawn but it would appear the site may have been more readily dismissed than it should have been.
- 5.4 In other regards it is considered that Honi_09 is preferable to the proposed employment allocations Gitti_04 and Gitti_03 and second choice housing allocation Giiti_06 all of which are further from the centre of the town and will significantly extend the settlement to the west in a linear form. Furthermore, whilst Giiti_06 falls outside of the AONB it is directly on the edge and highly visible from it.
- 5.5 Given our comments in respect of the need we consider the Plan will need to provide for greater housing and employment growth and that Honi_09 should be further considered as a potential option for Housing and Employment development to meet this need.
- 5.6 We also note that the have identified areas considered suitable for solar development under Strategic Policy 30 and this includes land within the AONB. It is unclear in this regard as to the status of sites which have been presented for other development but have presently been rejected. We would consider this site as suitable for solar development for the same reasons as set out in paragraph 5.3 and as it is close to suitable grid connections.