



EAST DEVON DISTRICT COUNCIL

HOUSING MONITORING AUDIT TRAIL DOCUMENT

2023 Monitoring Point East Devon district

**Companion document to the East Devon Housing
Monitoring Update to 31 March 2023**

Comprising:

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November 2023

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Introduction

- 1 East Devon District Council (EDDC) has produced this report as a companion document to the East Devon Housing Monitoring Update to 31 March 2023¹ (HMU 2023). It is the audit trail document referred to in paragraph 3.11 4th bullet point in HMU 2023.
- 2 It is a technical document, with considerable detail and explanation, particularly in Appendix B. The primary purpose of the report is to provide technical evidence which supports and justifies the council's housing trajectory for East Devon at the 31 March 2023 monitoring point. That is, the forecast supply of housing completions in East Devon district between 1 April 2023 and 31 March 2028. The council relies on this information to calculate the district's 5 year housing land supply position. That evidence is used for development management purposes, specifically for Nationally Planning Policy Framework paragraph 74 purposes.
- 3 It also provides information as part of the evidence base for the emerging East Devon Local Plan 2020 to 2040, which will be used to help justify the housing supply forecast for that plan period, and the related 'rolling' 5 year housing land supply position assessments.
- 4 This is the first Housing Monitoring Audit Trail Document to be published by East Devon District Council. Whilst HMU documents include lists of recorded and forecast completions based on planning permissions, this is the first published document detailing forecast completions on an 'outlet' basis. An 'outlet' is where a single builder/developer/landowner:
 - Is implementing a detailed planning approval (ie reserved matters or a full planning approval). There are some very large developments, such as Cranbrook Phase 1 and Redhayes, where there are multiple developers building dwellings on multiple phases. The council is aware that builders/developers will only forecast completions on those parts of sites where they have outlets i.e. delivering the dwellings that they are building; or
 - Is the owner of or has an 'interest' in part or all of an outline planning approval or allocation.
- 5 The explanation and justification of the forecasts of future completions is set out in detail in Appendix B, including consistency with National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). The council has been particularly mindful of recent appeal decisions regarding the concepts of 'clear evidence' and Inspectors' expectations about 'compelling evidence' in relation to demonstrating the 5 year housing land supply position. The council considers that the HMU 2023, supported by this Housing Monitoring Audit Trail document provide the compelling evidence

¹ <https://eastdevon.gov.uk/media/yt5hdvi0/hmu-to-year-end-31-march-2023-sept-2023-final.pdf>

to justify the 2023 5 year housing land supply position for East Devon set out in the HMU 2023.

- 6 Comprehensive, detailed information is set out in seven technical appendices to this 2023 Housing Monitoring Audit Trail document:
- Appendix A – list of major sites (that is large outlets of gross 10 or more dwellings) that are included in Appendices B, C, D, and E.
 - Appendix B – Commitments on major sites at 31 March 2023 (dwellings plus dwelling equivalents from care homes development). It provides detailed site profiles including the recorded completions up to the 2023 monitoring point on those sites as well as a forecast of future completions.
 - Appendix C – Completed sites (major sites - dwellings plus dwelling equivalents from care homes development) where the approved housing development was finally completed between 1 March 2020 and 31 March 2023. The details include the recorded completions up to the 2023 monitoring point.
 - Appendix D – Expired sites major sites – (dwellings plus dwelling equivalents from care homes development) where the planning approval expired between 1 March 2020 and 31 March 2023. There is therefore no recorded or forecast of future completions on these sites.
 - Appendix E – Zero'd sites (sites that were major commitments but which have since been or are confirmed as being developed as 'small' sites (9 or less dwellings)). So, there is no recorded or forecast future completions on these sites as major sites. Those major sites' completions forecasts are zero'd in order to avoid double-counting with small sites recorded or forecast completions/ commitments). They are listed to provide a record of the change in site size status.
 - Appendix F – Responses to the council's 2023 questionnaire for major sites and /or additional questions (redacted in line with the relevant planning policy privacy notice).
 - Appendix G – Example of Table 2 - A summary of a site's lead in time stages and completions to 2023 monitoring point which is included in the engagement questionnaire.
- 7 For the avoidance of doubt, the document is not an Annual Position Statement (APS) for NPPF paragraph 75 purposes because an APS can only be prepared by Local Planning Authorities that have Plans which have been recently adopted (as defined by footnote 40 of the NPPF) or where they are renewing a confirmed land supply following a previous Annual Position Statement. The East Devon Local Plan is not a recently adopted local plan and there was no APS produced at the time of its adoption.

- 8 Whilst NPPF and PPG provide guidance for the production of Annual Position Statements, there is more limited guidance for the production of other evidence such as the Housing Monitoring Audit Trail document to justify the 5 year housing land supply. The council relies on the council's application of the concepts of 'deliverable' and 'developable' housing sites as defined in the NPPF glossary and the requirements in NPPF paragraph 74. It has also drawn on available guidance in PPG, as well as lessons learnt from planning appeals in England.
- 9 The council has engaged or sought to engage with the appropriate house builder/developer or otherwise the landowner of each major site with extant planning permission and on Local Plan allocations not yet developed to obtain information on their anticipated site progress and completions forecast. Most have identified issues related to the effect of interest rates, the economy, the availability of materials and labour, and the effect on the housing market. Most are managing their housebuilding process to manage the risks at this time. This is reflected in their latest forecasts.
- 10 The council has carefully considered their evidence when forecasting future completions as part of a comprehensive audit trail of evidence and analysis to support and justify the council's housing trajectory for each large (major) site. Where the council's trajectory departs from the developers/builders/landowners' information the audit trail justifies the reasons for departure.
- 11 The last monitoring year has been particularly challenging for the housebuilding industry. EDDC has carefully monitored the progress of housing development. The council is aware of at least 5 major sites with extant detailed planning permission (some having commenced) where there have been significant delivery issues (eg work has stopped and dwellings not started or left half completed; the builder/developer is now in administration, or in compulsory liquidation; the registered company has been reported as First or Final Gazette for 'compulsory strike-off'; land is being sold with the benefit of planning permission in order to achieve value to pay off creditors). In some cases, work is likely to be going on 'behind the scenes' to try to get development completed. The council has taken a cautious approach at this time to the forecast of housing completions on these sites, due to the level of uncertainty and lack of sufficiently clear evidence about when they would be completed. In these cases, the council considers it prudent not to include the remaining dwellings on these sites in the 5 year forecast from the 2023 monitoring point. They may still deliver in the mid to long term. The council will continue to monitor them for any future progress.
- 12 The analysis in Appendix B therefore provides compelling, robust evidence to justify the number of deliverable dwellings that are forecast to be delivered in the 5 years (years 1 to 5) from the 2023 monitoring point (ie between 1 April 2023 and 31 March 2028). It should be noted that some larger site outlets have both a deliverable supply and a developable supply. Appendix B also provides forecasts for delivery from year 6 onwards from the 2023 monitoring point about housing completions on 'developable' sites.

- 13 Appendices C, D, and E provide records about why sites previously forecast for future completion are no longer in the 5 year supply forecasts either because they were completed by 31 March 2023, or the approval has expired or because they are no longer major sites, and zero'd to avoid double counting.