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From: Planning Central
Sent: 16 January 2023 08:45
To: Planning Policy
Subject: FW: Comments on draft local plan

Categories: Reg.18 consultation

From: G & K Gillanders [REDACTED]
Sent: 15 January 2023 14:04
To: Planning Central <PlanningCentral@eastdevon.gov.uk>; Cllr Paul Arnott [REDACTED]
Subject: Comments on draft local plan

Dear sirs

I am sending this email because the web-based format for comments on the local plan does not adequately allow the expression of my views.

In general I support the plan, both in strategy and detail.

However, the prescriptive format for comments does not allow me to say this except by the ridiculously cumbersome method of adding 'emojis' to every paragraph. This mode of consultation insults the intelligence of consultees and seems designed to exclude those who are less determined and less technologically adept.

There are elements in the plan about which I strongly disagree and I focus on these below. As a former town planner, housing specialist and demographer, I wish to focus mainly on the plan's housing policies. I also focus on the implications of the plan for the Sid Valley.

Housing targets

I have read the consultants' report on housing demand (East Devon Housing Need, Supply and Requirement, Interim Topic Paper, November 2022).

I recognise that the NPPF is (was) prescriptive on how local housing needs are to be established and that local plans must allocate sufficient land to meet those needs. However, it is important to note that the Standard Method for assessing local housing need is based on ONS projections of households and includes trend migration. So "local need" is in fact not local need as most residents would accept the term (ie the excess of newly forming households in the neighbourhood plus local suppressed demand); in fact East Devon's natural population growth is negative. The projections were based on a period when East Devon was subject to large in-migration from Exeter to Cranbrook, and there is a danger that this trend becomes self-perpetuating by being built into successive plan targets.

Moreover, even under NPPF these rules applied at the level of the district not at the level of individual neighbourhoods eg the Sid valley.

The Government has now had a change of policy regarding NPPF 'housing numbers' and determined that the 'proposed numbers' are just 'advisory' as opposed to prescriptive. So this change in approach should be reflected in the Local Plan's proposed policies. Accordingly, I strongly argue that the 'housing targets' numbers should be reduced except where there is a clear **local** need for affordable housing.

Specifically in the Sid Valley there is **no** scope for further housing development on greenfield sites because the existing settlements are surrounded by the AONB, protection of which should be a top priority.

Housing mix and allocation

The key issue for the Sid valley is the unbalanced population, with an excess of people over retirement age, and a housing market driven by wealthy incomers of retirement age and the accelerating loss of both lower cost owner occupied housing and privately rented accommodation to the holiday lets and second homes market. These trends have resulted in a housing crisis for lower income households and would-be households, with an acute lack of affordable housing in the Sid valley - something I encounter on a regular basis as an adviser for Citizens Advice.

The Neighbourhood Plan sought to address this via its housing mix and allocation policies (para 6.51). The Local Plan seems to do nothing to address this key issue. Only the 35% of housing that is to be 'affordable' will have a local connection clause. The local connection provisos (p184) should be applied to sites in Sidmouth (and other smaller settlements), not just rural exception sites.

I note the Principal residence requirement (Para 8.150 p191). The issue is not just second homes, but also holiday rentals displacing permanent tenancies in the buy to let market. Where is the evidence that this is just a coastal towns problem? And even if it is, why cannot it be included as a local plan policy applied to designated parts of the district?

I recognise that with current social housing funding and other national policy constraints the council has limited scope to address the issue of access to affordable housing. However, as a priority this is something the council should be seeking to change through the national political process, lobbying for such policies as the ability to apply punitive rates of council tax to second homes and for better control over holiday lets.

Yours faithfully

Gillian Gillanders

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