

EAST DEVON DISTRICT COUNCIL
ISSUES AND OPTIONS CONSULTATION RESPONSE

PREPARED FOR DOREPARK LTD

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1. Introduction

- 1.1 Thank you for the opportunity of commenting on the Issues and Options review of the East Devon Local Plan (EDLP).
- 1.2 We will first set out some general observations which are critical to plan progress.

Clarity

- 1.3 In our opinion 'West End' needs defining on a map/plan. Currently it is used as an imprecise term. Spatial definition of this term/policy area is, in our opinion, essential. The lack of clear definition creates difficulty when interrogating completion records and undertaking plan monitoring work.

Co-operation and overall housing numbers

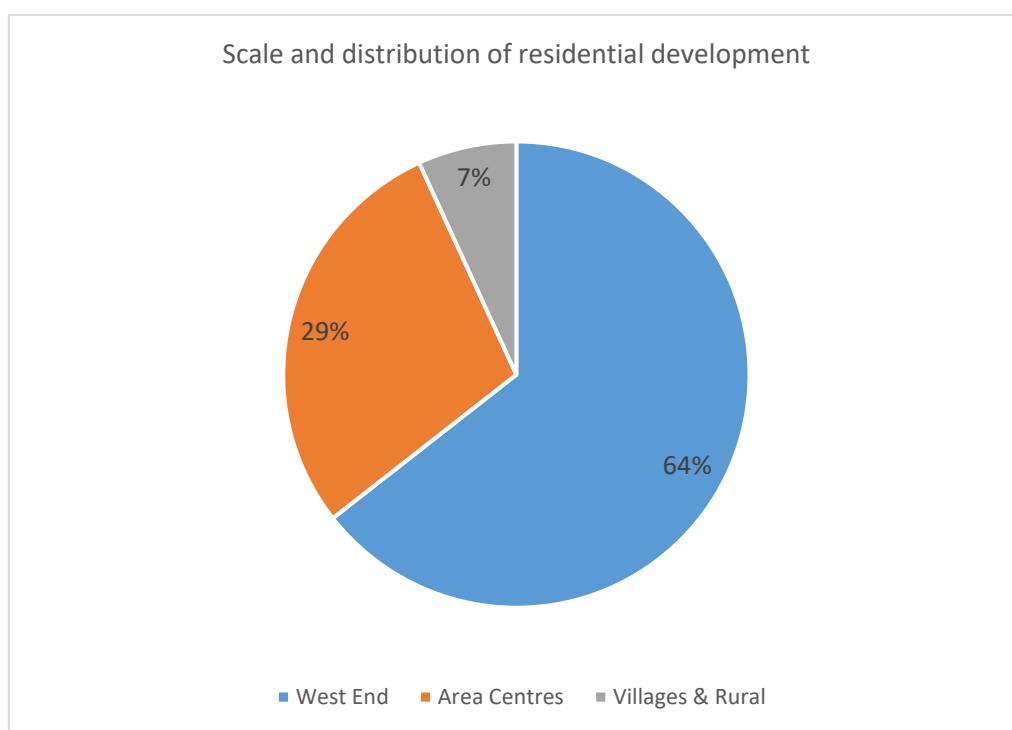
- 1.4 Whether, and to what extent, this local plan review should accommodate housing and employment needs that Exeter City Council cannot meet is a matter that needs explicit and transparent consideration in this review. Failure to consider this matter effectively and explicitly may lead to problems with adopting the plan review in due course. Consideration of this matter must precede a consideration of the appropriate spatial strategy of the plan.
- 1.5 Thus, there is a 'duty to co-operate' point that needs to be borne in mind here. It is a matter of fact that the Exeter Local Plan (ELP) was adopted with a target figure of 12,000 new homes over the plan period 2006 to 2026. This figure was accepted despite the assessed need (at that time) being 15,000 new homes (that figure emerged via the RSS process and was designed to achieve a better alignment between job creation and housing). The Exeter local plan Inspector noted that there was no evidence that the 15,000 figure was inappropriate (see IR, paragraph 15). In this context, the Inspector accepted Exeter City Council's 'environmental capacity'

argument (albeit expressing some concern about the lower figure) on the basis that the words 'at least' were inserted before the 12,000 figure (see also IR, paragraph 15). It is therefore a matter of fact that the Exeter plan failed to make full provision for the level of housing required to appropriately align with job creation.

- 1.6 This has led to a shortfall in allocated provision in the sub-region.
- 1.7 In practice Exeter City have failed to deliver sufficient new homes to make satisfactory progress towards meeting the plan target. Accordingly, the sub-regional deficit is a matter that this review cannot ignore. Despite this, the Issues and Options paper (I&O) does not consider the matter.

2. Meeting East Devon's Needs

- 2.1 The existing EDLP embodies a new home delivery target of 'a minimum' of 17,100 new homes over the period 2013-31 (950 new homes per annum). This target was based simply on the housing needs of East Devon and made no allowance for the fact that Exeter City was not (as evidence has demonstrated) able to meet its own housing delivery target.
- 2.2 The existing EDLP (strategy 2) sets out the following spatial distribution: West End 64%, Area centres 29% (Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth), and 7% to villages and the rural area. This spatial distribution pattern is set out in the pie chart below (figure 1).



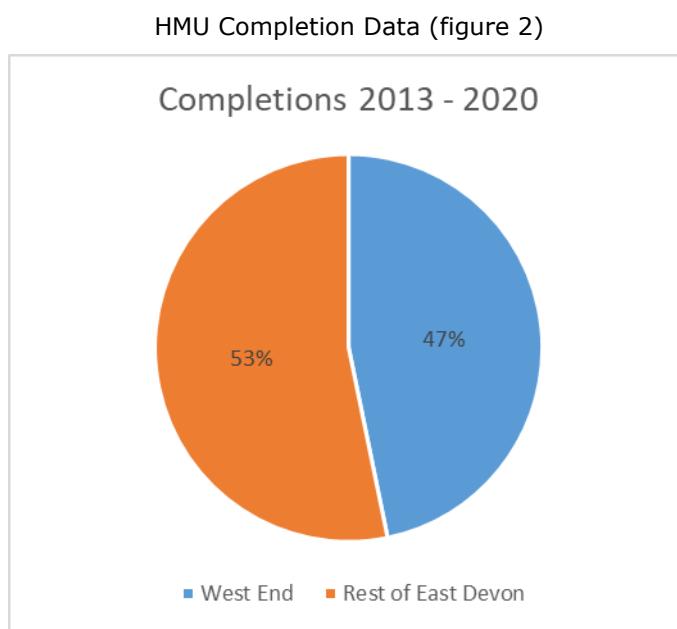
- 2.3 The initial strategy for the existing EDLP proposed a figure of 40% for the traditional towns of East Devon. The reduction to 29% prior to adoption of the existing plan was criticised, at the time, for starving (prejudicing) the vitality of the traditional towns of East Devon.

Development to date

2.4 Data published by the Council (in the Housing Monitoring Update [HMU] up to 31/03/2020) records the following level of completions:

- 3033 at the West End (47%)
- 3451 in the Rest of East Devon (53%)

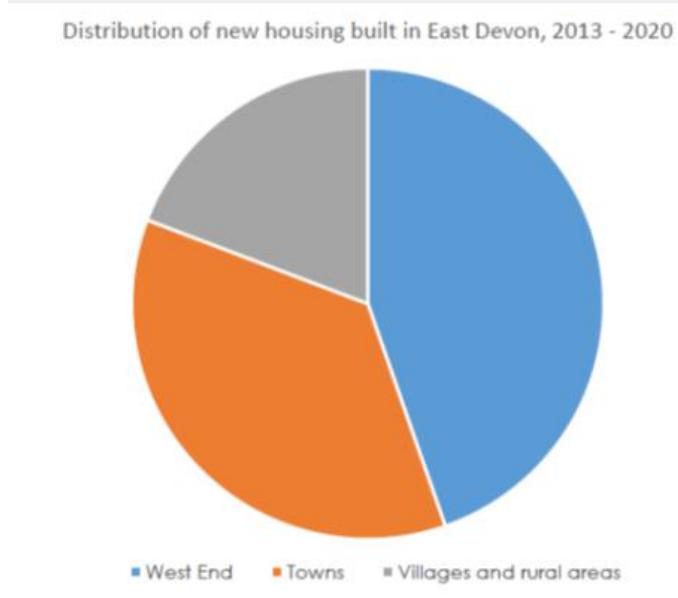
2.5 This spatial distribution is shown in the diagram below:



2.6 This delivery pattern clearly shows a lower proportion of West End completions than embodied within the existing Development Plan (see figure 1).

2.7 A more specific geographical breakdown is set out (in diagrammatic form, at paragraph 13.5 of the I&O report). That chart is reproduced on the following page for ease of reference.

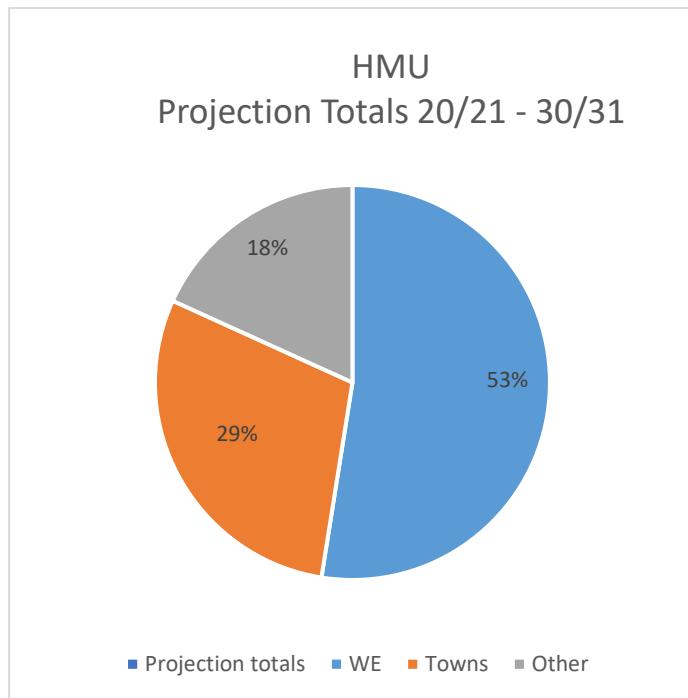
I&O Consultation Reported Completions (figure 3)



- 2.8 This spatial distribution shows a surprisingly high proportion of completions in the villages and rural areas (see figure 3 above). This spatial delivery pattern is not in accordance with the provisions of the existing Development Plan. It shows 44% of delivery at the 'West End' and some 20% in the villages. Both of these delivery outcomes are contrary to the spatial strategy of the EDLP. It demonstrates that rather than providing homes close to Exeter based jobs, a greater proportion than planned for have been provided in rural locations that are poorly served by jobs, services and public transport (i.e. not at the 'West End, nor at the traditional towns of East Devon).
- 2.9 What is also striking is that this data fails to correlate with the Housing Monitoring Update report (see figure 2).

Projected housing development 2020-2031

- 2.10 The data provided in the appendix to the HMU projects a development pattern over the period 2020-2031 that is summarised in the pie chart below (figure 4).



- 2.11 We note the expectation set out in the Issues and Options paper that, over the period 2013-2031, around 59% of all new homes will be built in the West End (Issues and Options, paragraph 13.2). This does not appear to correlate with the available data.
- 2.12 This variation appears to be the result of additional growth in lower tier settlements taking place at the expense of development at the West End, with development at the traditional towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth remaining static at 29%.
- 2.13 We question why this variation from the existing strategy is proposed.

3. Relevant Data

Affordable Completions

- 3.1 We have tried to understand whether the spatial distribution of new affordable completions mirrors the spatial distribution of new homes generally, but the data in the public domain on this subject is opaque.
- 3.2 We do know that a very high proportion of new affordable dwellings delivered in East Devon since 2013 have been at Cranbrook. Large amounts of Government funding was applied to the early phases of that development, and therefore relatively high proportions of affordable housing completions have been delivered. The ORS survey identifies that:

"One in five of those moving into new build properties had an income of less than 20k per annum. This rose to nearly a quarter of those moving into the Cranbrook area." (paragraph 36).

- 3.3 That would seem to corroborate that (affordable housing influenced) distribution pattern i.e. the vast majority of new affordable completions that have taken place in East Devon since 2013, have been at Cranbrook.
- 3.4 It is also interesting to note that the recent 'East Devon Local Housing Needs Assessment' (ORS, October 2020) conducted a survey of new build dwellings. That survey identified (amongst other matters) that:

"Just over nine in ten (91%) are satisfied with their current home. Levels of satisfaction are considerably lower in Cranbrook than elsewhere in East Devon with only 29% being very satisfied compared with 55% overall;

Almost all (87%) are satisfied with the area. However, it is clear that levels of satisfaction are considerably lower in Cranbrook than elsewhere in East Devon with only 16% being satisfied compared with 44% overall;" (paragraphs 39 and 40).

- 3.5 It is therefore clear that Cranbrook appears to be struggling with social satisfaction in a way that other settlements in East Devon are not.

- 3.6 The HMU data on affordable completions conflates new build completions with properties purchased on the open market with those delivered via the planning system (and that are therefore restricted, via S106, from future open market sale). It appears that of the 320 affordable completions reported at least 64 of those are as a result of open market purchase. This means that some 256 units were delivered via the planning system (of 1065 total completions) circa 24%.

Age Structure

- 3.7 The current EDLP states that:

"East Devon is characterised by an elderly population profile. This is most noticeable amongst the 60/65 plus age groups and reflects the popularity of the District as a retirement destination, especially the coastal areas. 28% of the East Devon population are over 65, compared with a South West figure of 20% and an England figure of 16%. The coastal towns of East Devon (Seaton, Sidmouth, Budleigh Salterton and Exmouth) have a particularly elderly population profile." (paragraph 2.5, page 12).

- 3.8 One of the key concerns associated with an overly 'Exeter focused' spatial distribution strategy is that, having regard to the population structure of East Devon (with a relatively elderly population structure, compared to the national average), that this will become more striking at the traditional towns of East Devon.

- 3.9 That is to say that:

- There is a concern that at the commencement of the plan period East Devon was recognised as having a relatively elderly population.
- We know that the distribution current Development Plan only sought to meet the housing needs of East Devon, and not to meet any Exeter under provision.
- We also know that the plan sought to focus growth near to Exeter.

- It appears that 'West End' growth has been typified by relatively high levels of affordable provision (relative to such provision elsewhere).
- It is often the case that new affordable homes are, to a significant extent, occupied by relatively young households (which is unsurprising since newly forming households is a key driver of identified affordable needs).
- It is therefore highly likely that 'West End' growth is typified by a predominately young age structure.

3.10 Whereas, at the traditional towns:

- There have been relatively small numbers of new homes.
- Often with relatively small numbers of new affordable homes.
- Meaning that these settlements, which are already relatively expensive areas to buy into, remain expensive, and predominately affordable only to well-heeled retirees.
- Therefore the (already imbalanced) age structure becomes more imbalanced as the young are forced out (to destinations such as Cranbrook).
- This process exacerbates the elderly nature of the population of the traditional towns of East Devon, meaning that they become, more and more, retirement communities, undermining their vitality.

3.11 The NHS (Northern, Easter and Western Devon CCG) has observed that at Cranbrook:

"The current population structure is unlike any other community in Devon, with an unusually extreme profile:

- *High proportion of adults aged 25 to 34*
- *Very high proportion of children aged under four*
- *Above national average proportion of children aged between five and 14*
- *Small proportion are aged 45 and over*
- *Very few above retirement age."* (Cranbrook – a healthy new town: health and wellbeing strategy 2016-2028, paragraph 2.2.2, page 10)

- 3.12 The current EDLP distribution pattern represented a shift from the previous Development Plan distribution pattern (which was based upon the traditional settlements and sought to meet needs where they arose) which had the virtue of ensuring that new development fulfilled a social cohesion role by supporting the vitality of the traditional towns of East Devon.
- 3.13 The current EDLP strategy has led to a situation where growth needs that emanate at existing towns have not been met at existing towns.
- 3.14 'West End' provision and a higher than planned for level of development in the rural areas has had the effect of starving the traditional towns of significant development.

How many new homes should be planned for each year?

- 3.15 The above comments all point to a conclusion that the '*Option 3*' growth figure i.e. 1,614 homes per year (in line with Government thinking) is the correct approach as it is the only option which would meet all affordable housing needs where they arise.
- 3.16 We will now consider the most appropriate spatial strategy.

4. Towards an appropriate spatial strategy

- 4.1 It appears that the current spatial strategy is leading to a lack of social cohesion at the traditional towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth by:
- Not meeting affordable needs where they arise;
 - Residents of working age moving to Cranbrook; and
 - The traditional towns becoming more and more inhabited by those of non-working age.
- 4.2 The relevant facts plainly demonstrate that there is precious little development that has and will take place at the traditional towns of East Devon in order that the socio-economic needs that are presented by the existing population of those settlements can be met where they arise.
- 4.3 This matter is of particular concern since the spatial strategy of West End concentration is being undermined by additional development at the villages, rather than additional development at the traditional towns of East Devon where unmet needs are prevalent.

Spatial Strategy

- 4.4 Clearly there is a strong justification for a 4th spatial strategy option to be pursued through this review, namely a predominantly '*Town Focused*' strategy i.e. meeting the majority of new growth at the traditional towns (defined as the extent of the Designated Neighbourhood Plan area where relevant e.g. Ottery St Mary includes West Hill for plan purposes). Albeit any such strategy must also recognise that an element of growth also needs to take place at lower order settlements (particularly villages that are well served by jobs, services and public transport) as well as adjacent to Exeter/West End.
- 4.5 Bearing in mind the spatial analysis that is presented in this report directing growth in this manner can be regarded as a necessary remedial action

bearing in mind the relatively low levels of growth provided for at the towns since 2013.

- 4.6 Now is the appropriate time to take the opportunity to allocate a level of development to the traditional settlements of East Devon that will mitigate, to some extent, the negative effects that are starting to become evidentially apparent and that are undermining social cohesion at those important settlements.
- 4.7 A town focused approach need not be exclusive – it just needs to be orientated that way. Additionally there is justification for providing for some further growth at the West End/Cranbrook, albeit there are unresolved matters (for example, the delivery of necessary mitigation such as SANGS) which require resolution to facilitate this.
- 4.8 Whilst care needs to be taken to limit the amount of development taking place in the more rural areas of East Devon there are some opportunities to provide for a degree of development that would be sustainably located, for example at villages that are well served by jobs, services and public transport, such as Clyst St Mary (albeit, there is an argument that Clyst St Mary should be included within the West End, accommodating growth accordingly, this linking back to our earlier comment regarding the need for a more precise definition) . The location of such villages dovetails with the need to provide new homes at Exeter, but within the EDDC administrative area i.e. in a manner where those new dwellings will be served by existing infrastructure located within the ECC administrative boundary, ensuring that the new development is sustainably located.
- 4.9 Albeit Clyst St Mary does not solely rely on Exeter infrastructure, as it comprises a varied mix of commercial uses and facilities, which have evolved over time, including, inter alia:
 - The Devon County Showground (the largest exhibition venue in the County)

- Theme Park (Crealy Theme Park and Resort is a major facility)
- Large-scale industrial and distribution, along with small and medium size businesses (including over 130 businesses at Hill Barton and Greendale)
- Motor industry
- Garden centre
- Farm shop and retail facilities
- Public house
- Park Home site

- 4.10 In addition to these services/facilities, and as well as being generally well related to the urban area of Exeter, the village is more specifically closely related to Junction 30 of the M5, Sandy Park, Science Park, and Sky Park.
- 4.11 As such, Clyst St Mary provides an ideal opportunity to deliver new homes at Exeter, but within the EDDC administrative area.