

## Report to West Hill Parish Council

8<sup>th</sup> May 2022

Cllr Jess Bailey, East Devon District Council and Devon County Council

### Local Plan

The Strategic Planning Meeting of EDDC took place on 3<sup>rd</sup> May. As usual it was live streamed on EDDC's youtube channel and can be watched subsequently. The agenda papers can be found here [Agenda for Strategic Planning Committee on Tuesday, 3rd May, 2022, 2.00 pm - East Devon](#)

The letter that EDDC wrote to the government challenging the high housing numbers, following my motion, is attached below. Also below is the government's response which suggests that EDDC can determine its own housing figures. In reality this is NOT the case because if EDDC deviates from the Government's standard methodology it risks the local plan being found unsound at the examination stage having spent hundreds of thousands of pounds throughout the local plan process.

The other frustrating aspect of the government's approach as outlined in agenda item 6 is that the housing target has actually increased for East Devon from 918 houses required to be built to 946 houses to be built each year. This is because the government bases the housing figures on 'affordability' and due to houses here becoming less affordable with house prices increasing disproportionately to earnings, the target is increased. This is absurd because there is no evidence that building more houses is actually going to bring the affordability down when in fact we are all at the mercy of the housing market and the pressures of people wishing to move to the south west for life style and other reasons.

What I do agree however with the government in their letter is that the focus should be on the redevelopment of brownfield land through the local plan process. Over recent meetings of the strategic planning committee I have been repeatedly emphasising the importance of focusing on this rather than focusing on greenfield sites. The call for sites which has been through the HELAA process shows that sites to accommodate around 31,000 houses has been found, but only around 6,300 are in and around the towns (see chart below). Whilst not all of these sites will be included in the local plan (around 18,900 will be included) what this does show is that there is heavy weighting in the sites that have come forward to sites in and around villages. Given that 'sustainable development' should be focusing most houses where there are most jobs, services and facilities the disproportionate number of sites coming forward from villages is unsatisfactory. I am strongly in support of protecting our countryside and focusing development on brownfield sites and have been repeatedly calling for a study to be commissioned on what development could be allocated within the towns.

At the meeting following yet another comment from me about the importance of focusing development in the towns the committee was advised that EDDC will in fact be putting forward sites it owns into the current HELAA (deadline is 10<sup>th</sup> May). I will be watching closely to see how many houses can be accommodated in this way as and when further information is published.

In terms of 'non strategic' sites that have been put forward in West Hill, these are listed in a grid here <https://democracy.eastdevon.gov.uk/documents/s16306/Appendix%20Eii%20-%202021%202017%20non-strategic%20sites%20list.pdf>. The Helaa site assessments can be found at Appendix Fii by clicking on the 'West Hill' link.

<https://democracy.eastdevon.gov.uk/documents/s16396/Appendix%20Fii%20->

[%20Parish%20list%20of%20site%20assessment%20profiles%20from%202021%202017%20non-strategic.pdf](#)

In terms of strategic sites that have been put forward which fall within West Hill (in particular GH21-24 as shown on the interactive HELAA map), the GESP assessments have been published in E1 appendices to the agenda papers

<https://democracy.eastdevon.gov.uk/documents/s16284/Appendix%20Ei%20-%20HELAA%20submitted%20sites%202017%20strategic%20sites.pdf>

Submitted at Appendix F is a document which shows the sites that have been ruled out as not achievable under the HELAA process – which West\_11 Land adjacent to Hilden, Lower Broad Oak Road, West Hill, East Devon, EX11 1UE and West\_13 WEGGIS FARM, HIGHER METCOMBE, OTTERY ST MARY, DEVON, EX11 1SQ

<https://democracy.eastdevon.gov.uk/documents/s16307/Appendix%20F%20-%20Note%20on%20sites%20assessed.pdf>

I have found it quite difficult to set out the information and have asked the planners to consolidate all the information so that it is more user friendly.

The next stage in this process will to be assess the 'town sites' (probably June/July) that have been put forward before moving on to sites associated with the villages. It is also intended that there will be further developer presentations – I am not sure yet whether there will be any relevant for West Hill but I will keep the Parish Council informed.

**By parish**

4.66 Based on the sites counted in Table 8, Table 13 shows information by Parish about the combined number of confirmed available sites and 2017 sites not confirmed as available in East Devon, that have been assessed as suitable and achievable and sites' combined capacity for dwellings and employment land. (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook)

TABLE 13 – Net capacity of suitable/available/achievable sites from 2017 and 2021 Call for sites housing and employment (based on Table 8).

Table 13		
Parish	HOUSING	
	No of sites	Net dwellings capacity
Awliscombe	4	107
Axminster	15	1560
Axmouth	6	38
Aylesbeare	9	133
Branscombe	2	27

Broadclyst	8	640
Broadhembury	5	49
Budleigh Salterton	5	330
Chardstock	4	120
Clyst Honiton	10	9968
Clyst Hydon	2	25
Clyst St George	18	1172
Clyst St Mary	3	114
Colaton Raleigh	1	7
Colyton	9	490
Cranbrook	2	151
Dalwood	1	6
Dunkeswell	2	239
East Budleigh	1	18
Exmouth	11	970
Farringdon	6	4281
Feniton	8	485
Gittisham	2	464
Hawkchurch	3	54
Honiton	12	381
Kilmington	11	190
Lympstone	10	656
Membury	2	18
Musbury	5	64
Newton Poppleford	7	194
Offwell	2	32
Otterton	3	41
Ottery St Mary	23	1870
Payhembury	2	27
Plymtree	3	180
Poltimore	3	232
Rockbeare	14	723
Seaton	9	358
Sidmouth	14	688
Sowton	9	707
Stockland	5	54
Stoke Canon	1	12
Talaton	5	111
Uplyme	2	92
Upottery	1	20
West Hill	13	484
Whimble	14	852
Widworthy	1	28
Woodbury	31	1585
<b>DISTRICT TOTAL</b>	<b>339</b>	<b>31,047</b>

Notes:

Some identified sites straddle parish boundaries:

Date: 2 March 2022  
Direct email: [ithomas@eastdevon.gov.uk](mailto:ithomas@eastdevon.gov.uk)



The Rt Hon Michael Gove MP  
Secretary of State for Levelling Up, Housing and Communities  
House of Commons  
London  
SW1A 0AA

Dear Mr Gove

### **Standard Method for Calculating Housing Need**

I am writing on behalf of East Devon District Council following a debate at our Council meeting on the 21<sup>st</sup> February in which Members agreed to write to you calling on you to review the standard methodology for calculating housing need and to identify a more positive approach to solving the housing crisis.

The standard methodology is a crude and blunt instrument designed to deliver the government's target of 300,000 homes a year. Using a mathematical equation to determine how many homes are built and where is a fundamentally flawed approach that pays no regard to key factors such as land availability and environmental constraints that need to be taken into account. The result is a housing need figure for East Devon that can only be met through harming our attractive landscape areas including two Areas of Outstanding Natural Beauty (AONB's) and areas where development has been shown to have a significant detrimental impact on designated wildlife habitats. Between them these areas make up well over 90% of East Devon. We have next to no brownfield sites to develop and so housing has to be built on attractive green field sites to the detriment of the landscape and wildlife. The natural environment is what attracts people to East Devon and makes it such a wonderful place to live but the standard method means that we have to sacrifice that to satisfy a housing need generated by a flawed algorithm.

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**East Devon – an outstanding place** Chief Executive: Mark R Williams

The main input into the standard method is household growth projections but these projections are based on past trends. The impact of this on the housing need figure is massive and yet all that this means is that growth is directed to the locations that have historically seen growth. As a result those areas of the country that have historically done as successive governments have asked and accommodated growth are punished by ever increasing housing need figures. This is because growth leads to a growing population which in turn increases household growth projections thereby creating a need for even more homes.

East Devon has accepted huge amounts of growth in recent times through Cranbrook new town, large housing developments of thousands of homes on the edge of Exeter and urban extensions of many of our market towns. The number of homes delivered in east Devon per year has grown from around 700 a year less than 10 years ago to well over a 1000 in 2019. These developments have however used up the available land and led to a pattern of population and household growth that under the standard method fuels a supposed need for more and more homes in the future. These levels of growth are unsustainable and harmful to the environment and communities of East Devon.

The standard method approach is disconnected from government policy in that it distributes housing numbers across the country with no regard to key government objectives around sustainability, climate change, bio-diversity gain and levelling up. There is a desperate need to look to allocate new housing based on future needs and aspirations to protect the environment rather than based on past trends. To do this we need a joined up approach that looks at the ability of different areas to deliver growth that best meets the government's national planning policies and aligns with the levelling up agenda. This could be achieved through a national housing strategy or through other mechanisms that use sound planning principles to determine where new homes are accommodated rather than maths.

East Devon District Council is calling on the government to find a more positive approach to solving the housing crisis and a move away from algorithms that pay no regard to the consequences of new housing numbers on the environment and the communities affected by growth. We look forward to hearing from you.

Yours sincerely

Councillor Ian Thomas  
Chair of East Devon District Council





Department for Levelling Up,  
Housing & Communities

Rt Hon Stuart Andrew MP  
Minister of State for Housing

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Our Ref: 16405025

28 March 2022

*Dear Cllr Thomas*

Thank you for your letter of 2 March to the Rt Hon Michael Gove MP regarding the standard method for calculating local housing need. I am replying as Minister of State for Housing.

I hope you will understand that, due to the Secretary of State's quasi-judicial role in the planning system, I am unable to comment on specific local plans or local issues. However, I can offer the following general comments, which I hope you will find useful.

The Government is clear that to help make home ownership affordable for more people, and to help more people rent their own home, we need to deliver more homes. A crucial first step to getting enough homes built in the places where people and communities need them, is to plan for the right number of homes. That is why, in 2018, we introduced a standard method for assessing local housing need to make the process of identifying the number of homes needed in an area simple, quick and transparent.

In December 2020, to support working towards our target to deliver 300,000 homes per year, we changed the formula to increase need in our 20 most populated urban areas to maximise use of existing infrastructure and to support development that reduces the need for high-carbon travel. The uplift in need within our biggest cities and urban centres in England also supports our wider objectives of regenerating brownfield sites, renewal and levelling up. All other local authorities in England – including East Devon – saw no change compared to the previous method, so in effect continue to calculate their local housing need in the same way they had been previously.

The standard method is used by councils to inform the preparation of their local plans. Councils decide their own housing requirement once they have considered their ability to meet their own needs in their area. This includes taking local circumstances and constraints (such as areas of outstanding natural beauty) into account and working with neighbouring authorities if it would be more appropriate for needs to be met elsewhere. This recognises that not everywhere will be able to meet their housing need in full.

Paragraph 11 of the National Planning Policy Framework sets out that, for the purposes of plan-making, local planning authorities should provide for objectively assessed needs for housing and other uses, unless the application of policies in the Framework to protect the areas, set out in Footnote 7, provide a strong reason for restricting development in the plan area. These policies include National Parks, Areas of Outstanding Natural Beauty and Green Belt. For the purposes of decision-taking, paragraph 11 also sets out that planning permission can be refused where the

application of policies in the Framework to protect the areas, set out in Footnote 7, provides a clear reason for refusing the development proposed.

Local authorities are expected to give, throughout their planning policies and decisions, full consideration to all relevant policies in the National Planning Policy Framework (NPPF), including those protecting the natural environment, irreplaceable habitats and valued landscapes.

The NPPF says local authorities should give substantial weight to the value of using suitable *brownfield* land within settlements for homes. They should support housing development on under-utilised land by, for instance, converting space above shops and building on or above service yards, car parks, lock-ups and railway infrastructure. It is also clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and that developments make optimal use of the potential of each site.

Ministers are considering how to best take forward proposals for changes to the planning system, and an announcement on next steps will be made in due course. An integral part of any changes will be considering how they align with and support the Department's wider mission to level-up the country and regenerate left-behind places.

As with all policies, we are monitoring the impact of the new standard method, particularly as the impact of changes to the way we live and work and levelling up become clear.

Thank you again for your letter. I hope you find this information helpful.

Yours  
Stuart

RT HON STUART ANDREW MP