

**Planning policy**

# Housing Monitoring Update

Up to 31 March 2024



November 2024

## Contact details

Joe Dunnett,  
Planning Policy,  
East Devon District Council,  
Blackdown House,  
Border Road,  
Heathpark Industrial Estate,  
HONITON,  
Devon EX14 1EJ

Phone: 01395 571518

Email: [planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk)

<https://eastdevon.gov.uk/planning/planning-policy/monitoring>

[planningpolicy@eastdevon.gov.uk](mailto:planningpolicy@eastdevon.gov.uk)

Front cover photo: Keith Lane

To request this information in an alternative format or language please phone 01395 516551 or email [csc@eastdevon.gov.uk](mailto:csc@eastdevon.gov.uk)

---

## Contents

1	Introduction.....	4
2	Completions 2023-24.....	9
3	Projections 2024-2029.....	16
4	Plan period completions and trajectory 2013-2031 .....	20
5	District Four and Five Year Housing Land Supply Position .....	24
6	Delivery compared to adopted plan trajectory.....	28
7	APPENDIX 1 - Local housing need calculation.....	30

## 1 Introduction

- 1.1. This document provides the housing monitoring update for East Devon District Council (EDDC) to a base date of **31 March 2024**. It forms part of the district's Authority Monitoring Report for monitoring development and related key indicators in the adopted East Devon Local Plan 2013 to 2031. Section 113 of the Localism Act (2011) removed the requirement for councils to submit an Annual Monitoring Report (AMR) to the Secretary of State but allowed monitoring reports to be produced covering individual indicators which must be published at least once a year. This housing monitoring update complies with that requirement.
- 1.2. One key indicator in the adopted local plan is the number of new dwellings built annually within the district. This document reports on annual completions since 2013.
- 1.3. The adopted local plan also identifies non-delivery of the five year housing land supply as a trigger for policy review and action. In accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), this document also provides the evidence presenting the current five year housing land supply position for East Devon district as at 31 March 2024 for use in the operation of NPPF paragraph 77 for development management purposes. That housing supply position covers the five year period from 1 April 2024 to 31 March 2029. It applies from 1 April 2024.
- 1.4. The East Devon Local Plan 2013 to 2031 is not 'recently adopted' and the council does not have a previous Annual Position Statement. For these reasons, and for the avoidance of doubt, the council will not be submitting this Housing Monitoring Update 2024 as an Annual Position Statement to 'confirm' the five year housing land supply position for the purposes of NPPF Paragraph 78 (and PPG Housing supply and delivery paragraphs 12 to 18 and 60).
- 1.5. The 2024 National Planning Policy Framework can be found on-line at:  
[https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

The most up to date Planning Policy Guidance, at time of publishing, which is relevant to this report can be found on-line at:

<https://www.gov.uk/guidance/housing-supply-and-delivery>

This report considers the following:

Housing completions since 1 April 2013, and in particular the completions over the last 12 month period (1 April 2023 – 31 March 2024) including:

- Total net completions district wide;
- Gross completions districtwide by parish, settlement, and Built-up Area Boundary;
- Breakdown of completions on brownfield and greenfield sites;

- Affordable housing.

Forecasts future housing completions which provide the housing trajectory from 1 April 2024 to the end of the adopted Local Plan period.

The East Devon four and five year housing land supply position as at 31 March 2024 (for the period 1 April 2024 to 31 March 2029) for NPPF paragraph 77 purposes.

Comparison of past and future forecast housing delivery to the following:

- The key monitoring indicator (17,100 dwellings in the plan period);
- The residential development trajectory illustrating the expected rate of housing delivery over the plan period, and related Appendix 2 in the adopted East Devon Local Plan 2013 to 2031.

- 1.6. At time of writing there is a consultation process active on the NPPF. The consultation period opened in the summer of 2024 and, importantly for this document, looked to change the local housing requirement figures (LHR). To allow the transition between the old and new LHR there is a period of 2 years in which councils, which meet a criteria set out in paragraph 5.6-5.7 of this document, may be judged for planning decision purposes, against a 4 year housing land supply rather than a 5 year housing land supply. This should be taken into consideration when reading this document, especially when considering the housing land supply figure calculated and explained within this HMU.
- 1.7. The latest National Planning Policy Framework (NPPF), published December 2023, requires councils to be able to demonstrate a five year supply of land for housing and depending on the results of the most recent housing delivery test, a 20% buffer requirement. Paragraph 79 of the NPPF states that local planning authorities should:

*“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority’s housing requirement over the previous three years, the following policy consequences should apply:*

*a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;*

*b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 77 of this framework, in addition to the requirement for an action plan.*

*c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.”*

- 1.7 In addition to this, paragraph 11 of the revised NPPF states:

*“Plans and decisions should apply a presumption in favour of sustainable development.*

For **plan-making** this means that:

- a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For **decision-taking** this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date\*, granting permission unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

*\*This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years – see paragraphs 1.11 to 1.20 below.*

1.8 This report considers the extent to which extant permissions (including sites currently under construction) and future additional windfalls contribute towards meeting the five year requirement.

1.9 The National Planning Policy Framework (NPPF) can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)

## Housing Delivery Test

- 1.10 Since November 2018, councils have also had to pass the new Housing Delivery Test (HDT). Rather than simply looking at what *can* be achieved over the following five years, the HDT checks what *has* been achieved over the previous three, with delivery of the full amount resulting in a score of 100%.

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

- 1.11 The number of net homes delivered is the national statistic for net additional dwellings over a rolling three year period, with adjustments for net student / other communal accommodation.

### *Net homes delivered in a year*

*= Net Additional Dwellings National Statistic*

*PLUS*

*net increase in bedrooms in student communal accommodation in local authority*  
*average number of students in student only households in England*

*PLUS*

*net increase in bedrooms in other communal accommodation in local authority*  
*average number of adults in households in England*

- 1.12 Where the latest adopted housing requirement figure is less than five years old, or has been reviewed and does not need updating, the figure used will be the lower of either the latest adopted figure or the minimum annual local housing need figure.
- 1.13 Where the latest adopted housing requirement figure is over five years old, unless the strategic policies have been reviewed and found not to require updating, the figure used for areas with a Local Plan will be the minimum annual local housing need figure.
- 1.14 For more information on the calculations, the HDT Measurement Rule Book can be found at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728523/HDT\\_Measurement\\_Rule\\_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)
- 1.15 The HDT comprises three elements:

- i) If delivery has been less than 95%, the council should prepare an Action Plan to address the reason for the shortfall;
- ii) If delivery has been less than 85%, the council should also include a 20% buffer in calculating its Five Year Land Supply (rather than 5% or 10% as previous NPPF iterations defined);
- iii) If delivery has been less than 75%, the presumption in favour of sustainable development would then apply.

1.16 The results of the fifth HDT (covering 2019/20 to 2021/22) were released in December 2023. East Devon District Council passed the test with a score of 126%, meaning no 20% buffer is required when calculating the housing land supply figure, the calculations are shown below in table 1.

<https://www.gov.uk/government/publications/housing-delivery-test-2022-measurement>

1.17 Figures used in the calculation of the Fifth Housing Delivery Test.

**TABLE 1: Requirement and delivery 2019-2022**

Number of homes required			Total number of homes required
2019-20	2020-21	2021-22	
824	618	918	2360
Number of homes delivered			Total number of homes delivered
2019-20	2020-21	2021-22	
1065	867	1039	2971

**TABLE 2: Housing Delivery Test calculation and results 2019-2022**

Total number of homes required	Total number of homes delivered	Housing Delivery Test: 2022 measurement	Housing Delivery Test: 2022 consequence
2360	2971	126%	None

1.18 Previous results, including the fifth HDT detailed above were:

First HDT (2015/16 to 2017/18)	149%
Second HDT (2016/17 to 2018/19)	121%
Third HDT (2017/18 to 2019/20)	122%
Fourth HDT (2018/19 to 2020/21)	123%
Fifth HDT (2019/20 to 2021/22)	126%

- 1.19 The result of the sixth HDT (covering 2020/21 to 2022/23) are anticipated at the point of drafting.

## 2 Completions 2023-24

### **How do we know if a house has been completed?**

- 2.1 Housing completions are monitored throughout the year using the Housing Monitoring database (which uses the Microsoft Access platform), which is linked to the main EDDC Uniform database. This includes new builds, change of uses and conversions.
- 2.2 When the Basic Land and Property Unit (BLPU) state of any given dwelling's Unique Property Reference Number (UPRN) changes (to BLPU State 2 – 'In Use' and a Primary Classification of 'Residential') within Uniform (i.e. a property is Council Tax banded), this will feed through to the appropriate planning record on the Housing Monitoring database.

### **How is a "dwelling" defined?**

- 2.3 For the purposes of housing monitoring, generally, a dwelling is defined as being a separately Council Tax banded property. As an example, this would mean that if a house that had previously been a single Council Tax banded dwelling were to be split into four flats, each being separately Council Tax banded, then there would be an assumed three net new dwellings on the site upon completion.
- 2.4 Annexes are not counted as a dwelling unless they become separately Council Tax banded, have the appropriate planning permission and are not tied conditionally to only be used as ancillary to the main dwelling.
- 2.5 In addition to this, the Housing and Economic Land Availability Assessment (HELAA) methodology for the Exeter Housing Market Area (HMA) April 2017 states that care and extra-care homes should contribute towards dwelling numbers despite units not being separately Council Tax banded. The reasoning for this is that as elderly people move into care / extra-care homes they "free up" open market dwellings for others to move into.
- 2.6 The methodology conservatively assumes that one dwelling is freed up by every two nursing or care home beds created. This is based on primary research conducted within the HMA whereby existing care homes were contacted to find out numbers of residents, the proportion that were permanent and the proportion that had previously lived alone. This research suggested that on average 50% of residents were permanent and had previously lived alone which suggests that when they permanently moved to the care home they were leaving an empty house.

n.b. New care/nursing home places in the October 2013-March 2014 monitoring period assumed 1.4:1 as a ratio, whilst from April 2014 to September 2014 1.67:1 was the assumed ratio. The Government's new Housing Delivery Test uses a ratio of 1.8:1; however, gains and losses in communal accommodation are

now reported separately to the main figures, with an assessment made on the number of bedrooms in question.

**Net Total completions**

- 2.7 A full schedule of completions and projections with planning permission by site from the start of the Local Plan period can be found in Appendix 2 to this report.
- 2.8 As shown in **Error! Reference source not found.** table below, net completions have fluctuated in the period 2013 to 2024. Of these, there have been five years, including the previous two, delivering above the annualised 950 dwellings per year policy requirement in the adopted local plan.
- 2.9 The table below breaks down the district net completions figures into two sub areas: West End and the Rest of East Devon. The West End can be defined as Cranbrook and other big strategic development sites on the Western side of the district, the area not within the West End is defined as the Rest of East Devon. These 2 sub areas are used for monitoring housing delivery.

**TABLE 3: Net Total Completions 2013 to 2024 – District and sub areas**

	Apr 13 to Mar 14	Apr 14 to Mar 15	Apr 15 to Mar 16	Apr 16 to Mar 17	Apr 17 to Mar 18	Apr 18 to Mar 19	Apr 19 to Mar 20	Apr 20 to Mar 21	Apr 21 to Mar 22	Apr 22 to Mar 23	Apr 23 to Mar 24
West End	486	531	403	335	326	392	560	455	568	518	358
Rest of East Devon	344	498	624	389	540	537	505	417	479	443	276
Annual TOTAL	<b>830</b>	<b>1,029</b>	<b>1,027</b>	<b>724</b>	<b>866</b>	<b>929</b>	<b>1,065</b>	<b>872</b> Revised to <b>867</b> by the MHCLG after taking the net loss of 9 care home bedrooms into account	<b>1,047</b> Revised to <b>1,039</b> by the MHCLG after taking the net loss of 15 care home bedrooms into account	<b>961</b> Expected to be revised to <b>998</b> by the MHCLG after taking the net gain of 67 care home bedrooms into account	<b>634</b> Expected to be revised to <b>623</b> by the MHCLG after taking the net loss of 20 care home bedrooms into account

**Key monitoring indicator results**

- 2.10 Based on the table above, there were **9,984** net total dwelling completions in East Devon (excluding dwelling equivalents from care home accommodation) from 1 April 2013 to 31

March 2024; **634** of these were in the 2023/24 monitoring year. Resulting in an average of 907.6 dwellings completed each year over the plan period.

- 2.11 Since the start of the plan period the average annual completions (including care homes) is **908** dwellings/dwelling equivalents per year, which is below the adopted local plan housing requirement. The average annual level of completions (including care home dwelling equivalents) has improved over the last five years and is now **918** per year, which is below the adopted local plan housing requirement of 950 per year but above the revised LHN annual target of 893. The increased delivery rate in the last five years has not yet mitigated the slower delivery rate in the first five years. It has not been sufficient to result in a surplus (“oversupply”) at the 2024 Monitoring Point.

### Completions by parish

- 2.12 The table below shows gross completions during the 2023/24 monitoring period by parish. Parishes where there were no 2023/24 completions are not listed. Town councils are highlighted in yellow.

**TABLE 4: Gross dwelling completions by parish**

Parish	Total	Parish	Total
Awliscombe	2	Gittisham	43
Axminster	30	Hawkchurch	1
Axmouth	1	Honiton	24
Aylesbeare	1	Kilmington	3
Beer	4	Monkton	1
Bramford Speke	1	Newton Poppleford and Harpford	2
Broadclyst	224	Ottery St. Mary	6
Broadhembury	6	Plymtree	1
Budleigh Salterton	10	Rewe	4
Chardstock	1	Seaton	23
Clyst Honiton	1	Sheldon	1
Clyst Hydon	5	Shute	1
Colaton Raleigh	1	Sidmouth	11
Colyton	8	Southleigh	1
Cranbrook	135	Sowton	1
Dunkeswell	1	Talaton	1
East Budleigh	1	Uplyme	2
Exmouth	88	Upottery	1
Farway	1	Whimble	2
Feniton	2	Woodbury	2
		Total	654

### Completions by settlement

2.13 The table below shows gross completions during the 2023/24 monitoring period by settlement. Settlements are identified in the adopted local plan and completions have been sorted into settlements using the built-up area boundaries of the settlements. Settlements where there were no 2023/24 completions are not listed.

**TABLE 5: Gross dwelling completions by settlement**

Settlement*	Total	Settlement*	Total
Aunk	1	North of Blackhorse	136
Axminster	29	Ottery St Mary	3
Beer	4	Pinhoe	69
Broadclyst	1	Plymtree	1
Budleigh Salterton	10	Rawridge	1
Clyst Honiton	19	Raymond's Hill	1
Colyford	2	Rousdon Estate	1
Colyton	6	Rural areas	33
Cranbrook	135	Seaton	23
East Budleigh	1	Sidmouth	11
Exmouth	87	Talaton	1
Feniton	2	Uplyme	2
Honiton	66	Whimble	1
Kilminster	2	Wilmington	1
Monkton	1	Woodbury	2
Newton Poppleford	2	Total	654
<i>*Settlements as identified in the adopted East Devon Emerging Local Plan settlement hierarchy</i>			

### Completions by Built-up Area Boundary (BuAB)

2.14 The below table shows gross completions in the 2023/24 monitoring period by BuAB. The table is based on boundaries shown on the Policies Map from Development Plan Documents that were adopted or made as of 31 March 2024. Those BuABs where there were no 2023/24 completions are not listed.

**TABLE 6: Gross dwelling completions by BUAB**

<b>BuAB</b>	<b>Total</b>	<b>BuAB</b>	<b>Total</b>
Axminster	29	North of Blackhorse	136
Beer	4	Open Countryside	113
Budleigh Salterton	9	Ottery St Mary	3
Colyton	5	Pinhoe	69
Cranbrook	134	Seaton	23
East Budleigh	1	Sidmouth	11
Exmouth	87	Uplyme	2
Feniton	1	Whimble	1
Honiton	24	Woodbury	2
		<b>Total</b>	<b>654</b>

**Completions split by Greenfield / brownfield**

2.15 The table below shows the breakdown of gross completions between greenfield and brownfield sites during the 2023/24 monitoring period.

**TABLE 7: Gross dwelling completions by Greenfield/Brownfield**

		<b>Dwgs</b>	<b>%</b>
<b>Greenfield</b>	General	498	76.1%
	Agricultural / Forestry Building Conversion	20	3.1%
	Garden Sites	26	4.0%
	<b>TOTAL</b>	<b>544</b>	<b>83.2%</b>
<b>Brownfield</b>	Redevelopment	35	5.4%
	Conversions / COUs	75	11.5%
	Brownfield unclassified	0	0%
	<b>TOTAL</b>	<b>110</b>	<b>16.8%</b>
	<b>GRAND TOTAL</b>	<b>654</b>	<b>100%</b>

2.16 Greenfield describes any site on land which has not previously been developed. Brownfield therefore describes sites of previously developed land, the definition of which can be found within the glossary of the NPPF but is reproduced below for ease of reference:

**“Previously developed land:** Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

2.17 The table above shows that just over 80% of completions in the district during the 2023/24 monitoring period were on greenfield sites, which is 5% more than during the 2022/23 monitoring period.

### **Affordable completions**

2.18 The Housing Strategy and Enabling team report a total of 96 affordable units delivered during 2023/24, including 15 for social rent, 28 for affordable rent and 53 shared ownership.

#### Key facts for the year

- EDDC acquired 8 properties from the open market this year using Right to Buy receipts and LAHF (Local Authority Housing Fund) Round 2 funding to add to council stock;
- 12 affordable homes have completed at Cranbrook – Phase Six;
- 12 affordable homes completed at Exmouth – Buckingham Heights;
- 21 market units were purchased and converted to affordable with Homes England funding.

### **Net Windfall completions**

2.19 Windfalls refer to sites built-out which are the result of planning applications on sites which have not been allocated in the Local Plan.

2.20 The table below shows that over the past 12 months 197 of the 634 net completions have been windfalls. This equates to 31.1% of net completions in the last year. However, of these 197 net windfall completions, only 42 were in the West End with the remaining 155 in the Rest of East Devon. Resulting in 21.3% being in the West End and 78.7% in the Rest of East Devon.

**TABLE 8:  
windfall**

Gross site capacity	1-2 dwellings*	3-5 dwellings*	6-9 dwellings*	10-20 dwellings*	21+ dwellings*	TOTAL
RoED	55	17	31	25	27	155
West End	1	5	6	30	0	42
<b>TOTAL</b>	56	22	37	55	27	197
<b>Percentage</b>	28.43%	11.17%	18.78%	27.92%	13.71%	100%

**Net**

**completions (excluding garden-greenfield sites)**

\*Dwellings (excluding garden-greenfield sites)

### **Net communal accommodation completions**

- 2.21 Gains and losses of Use Class C2 (Residential Institutions) are reported to the Ministry of Housing, Communities & Local Government (MHCLG) through the annual Housing Flow Reconciliation Return. These figures are separate from the figures reported for gains and losses of dwellings. However, when converted to net dwelling equivalents, the change in communal accommodation is reported via the net supply figures used by Government to calculate housing supply delivery used for the Housing Delivery Test. They are reported in the Government's live tables on dwelling stock.
- 2.22 One new care home has been reported as closing in the 2023/24 monitoring year in East Devon district: Cranford Residential Home, Exmouth (20 bedrooms). It is anticipated this will result in a net loss of the equivalent of 11 dwellings once confirmed by the MHCLG.
- 2.23 No gains of care home accommodation occurred in the 2023/24 monitoring year.

## 3 Projections 2024-2029

- 3.1 This section is an assessment of forecast and projected completions for the remainder of the plan period from 1 April 2024 to 31 March 2031. The forecasts and projections can be broken down into:
- Sites with extant permissions at the 2024 Monitoring Point:
    - These are sites that already have planning permission (either detailed or outline, and including sites that are already under construction / sleeping) that are expected to be built-out.
  - Windfalls:
    - These are the adjusted allowance for completions on windfall sites, with the projection based on historic windfall completions (to avoid double counting, the adjusted allowance discounts small windfall sites with extant planning permission at the 2024 Monitoring Point).
  - Cranbrook expansion zones:
    - These are forecast completions on the four Cranbrook expansion areas – Treasbeare, Bluehayes, Cobdens and Grange (allocated in the Cranbrook Plan DPD adopted 19 October 2022, but without planning permission as at 31 March 2024). These include sites with recent Planning Committee resolutions to grant planning approval subject to completion of S106 agreements.
- 3.2 The planned housing development in the Axminster Masterplan area (including the adopted local plan allocation) is not forecast for delivery. The Council considers that due to the issues of nutrient neutrality, and the lack of funding to deliver the relief road this land is currently not deliverable. Although some areas in previous plans did not see development, it is expected that some sites still have potential and will be reallocated in the new local plan. If reallocation does not occur the site, if developed, will be a windfall.
- 3.3 The National Planning Policy Framework (NPPF) defines a “deliverable” site as follows:
- To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

3.4 The HELAA Methodology 2021, shown in the table below, was agreed between the four local authorities (East Devon District Council, Exeter City Council, Mid Devon District Council, and Teignbridge District Council) in 2022. It is reproduced as part of the East Devon Housing and Economic Land Availability Assessment 2022. (Appendix A is the HELAA Methodology 2021) This is available online at:

<https://eastdevon.gov.uk/media/3724867/appendix-a-helaa-methodology-may-2021.pdf>

**TABLE 9: HELAA Methodology for calculating build-out rates**

Size of site (no. of dwellings)	Commencement of sites			Build-out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1st year - 12 dwellings maximum. 2nd year onward - 25 dwellings per year maximum	1st year - 25 dwellings maximum. 2nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1st year - 12 dwellings maximum. 2nd year onward - 25 dwellings per year maximum	1st year - 25 dwellings maximum. 2nd year onward - 50 dwellings per year maximum
501-1,000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1st year - 12 dwellings maximum. 2nd year onward - 50 dwellings per year maximum	1st year - 25 dwellings maximum. 2nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1st year - 12 dwellings maximum. 2nd year onward - 75 dwellings per year	1st year - 25 dwellings maximum. 2nd year onward - 150 dwellings per year

**Small site projections (1-9 Dwellings total)**

3.5 Projections are based on the status of sites and extant planning permissions at 01 April 2024. Projected build-out rates for small sites (1-9 dwellings in total) generally follow the approach advocated by the Exeter Housing Market Area (HMA) Housing and Economic Land Availability Assessment (HELAA) methodology market conditions model, unless we are aware of an alternative build-out rate.

**Large site projections (10+ Dwellings total)**

3.6 Projected build-out rates for large sites (10+ dwellings in total) have been calculated by consulting with the relevant developer responsible for each planning permission. Each Large site developer was contacted regardless of planning permission progress under

construction to awaiting decision on an outline application. Developer consultation took place in summer 2024.

### Windfall projections

- 3.7 As mentioned, paragraph 72 of the NPPF allows for future additional windfall completions to be taken into account so long as historic windfall delivery is considered and with the implication that sites on gardens are not counted.
- 3.8 The Exeter HMA HELAA methodology sets out a clear process by which windfalls will be calculated assessing delivery of windfalls (excluding gardens and sites of more than 20 gross dwellings) over the last five full years. That being the case, the assessment below shows net windfall completions (excluding gardens) over the last five full years (1 April 2019 to 31 March 2024).
- 3.9 Net completed windfall dwellings are split into the gross capacity of the site on which they came forward in order to be able to analyse the types of windfalls that might come through in the future:

**TABLE 10: Windfall completion analysis 2019-2024**

Gross site capacity	Apr 2019 to Mar 2020	Apr 2020 to Mar 2021	Apr 2021 to Mar 2022	Apr 2022 to Mar 2023	Apr 2023 to Mar 2024	Average per year
1-2 dwgs	69	50	58	43	35	51
3-5 dwgs	29	30	19	17	25	24
6-9 dwgs	17	35	3	26	14	19
10-20 dwgs	18	22	47	32	11	26
<b>Totals</b>	<b>133</b>	<b>137</b>	<b>127</b>	<b>118</b>	<b>85</b>	<b>120</b>

- 3.10 The table above identifies a basic net average windfall projection of 120 dwellings. The methodology then requires this figure to be tempered by subtracting projected windfall completions on sites with planning permission or resolution to grant permission subject to S106. The table below shows how this figure is tempered accordingly to identify the adjusted windfall projection for each forecast year:

**TABLE 11: Adjusted windfall projections 2024-2029**

<b>Final projected windfall allowance</b>	<b>2024 to 2025</b>	<b>2025 to 2026</b>	<b>2026 to 2027</b>	<b>2027 to 2028</b>	<b>2028 to 2029</b>	<b>Total</b>
Total windfalls with permission (A)	817	279	143	24	107	1,370
<i>Of which windfalls that are on sites of 20 or less dwellings and not on garden-greenfield land (B)</i>	413	8	0	1	85	507
Basic windfall projection (C)	120	120	120	120	120	600
<i>Total eligible net windfalls (D)</i>	120	8	0	1	85	214
<b>Adjusted windfall projection (E) (C-D)</b>	0	112	120	119	35	386

- 3.11 Row B in the table above shows the projected year of completion and sum total of projected completions of sites which have extant planning permission, on sites of 20 or less dwellings, not on garden-greenfield land, and also remaining incomplete as of the 31st March 2024. These sites are forecast for completion in the five year period 1st April 2024 to 31 March 2029 and total 507 dwellings.
- 3.12 Because there are more permissions (total eligible net windfalls) than the basic windfall projection (the 120 per year in row C in the table above) in 2024/25, we cannot increase our predicted number of completions in that monitoring year. Therefore, the adjusted additional windfall in 2024/25 is nil.
- 3.13 In the periods 2025/26 through to 2028/29, however, the basic windfall projection is more than the total number of permissions – so we can add the difference to these two sets of figures (the adjusted windfall projection in row E) to our predictions for these monitoring periods. This means that using the Exeter HMA HELAA methodology we can include **386** additional dwelling windfalls in the forecast of deliverable housing supply in the next five years.

## 4 Plan period completions and trajectory 2013-2031

### Overall completion forecasts/projections and trajectory

- 4.1. Based on the various elements of future supply considered in Section 3 of this report, the tables below set out the annual forecasts of net housing completions for all housing supply for the remainder of the plan period from 1 April 2024 to 31 March 2031.
- 4.2. This is not intended to give a precise year-on-year prediction of how many new homes will be built each year, but it is the result of applying Planning Practice Guidance on identifying deliverable housing for major and non-major sites, and from applying the HELAA methodology for forecasting windfall development. This gives an overview of the potential future pattern of development.

**TABLE 12: Annual projected housing completions for 2024/25 to 2030/31**

Year	Extant permissions	Major / Large sites	Non-Major / Small sites	Cranbrook expansion zones projections	Exeter HMA HELAA calculated additional predicted windfalls	Total projections
2024/25	1,192	743	449	0	0	1,192
2025/26	647	647	0	0	112	759
2026/27	460	460	0	80	120	660
2027/28	287	287	0	235	119	641
2028/29	134	128	6	285	35	454
2029/30	291	181	110	402	120	813
2030/31	142	142	0	438	120	700

**TABLE 13: Housing Supply – Five Year period and to March 2031**

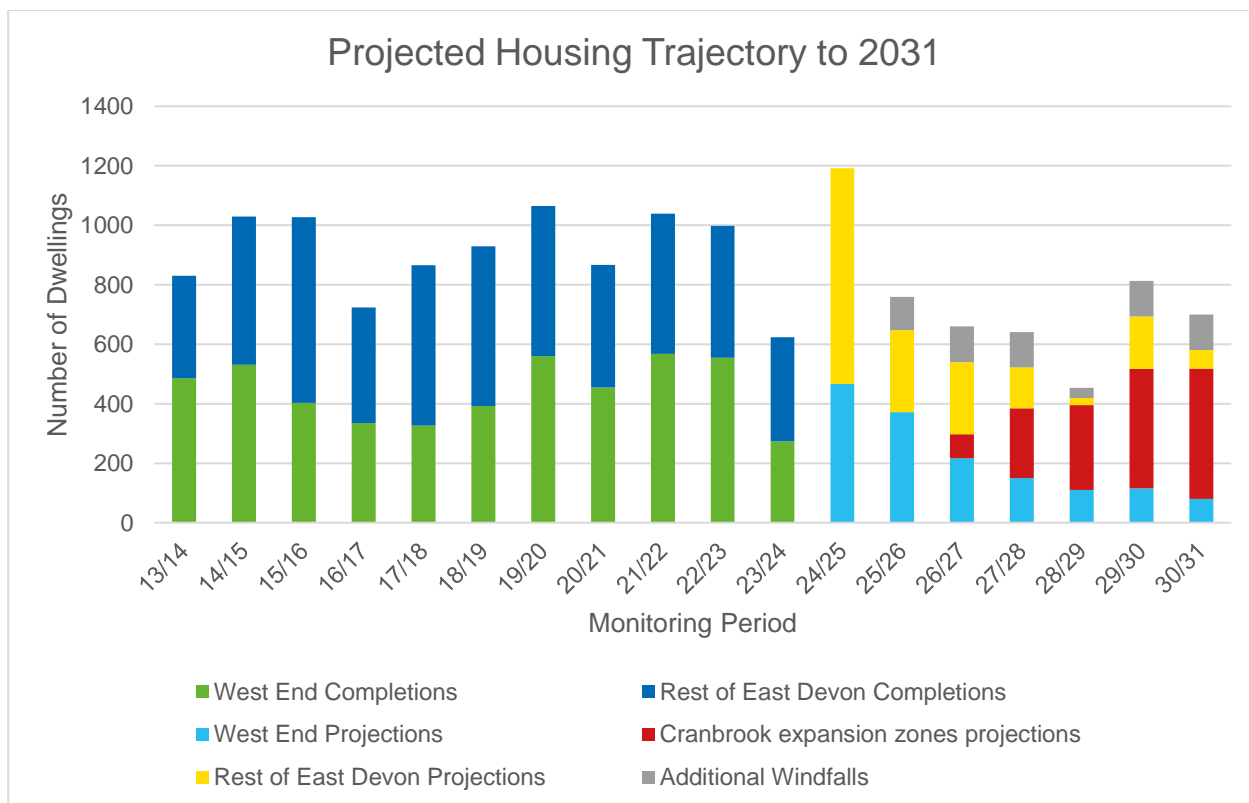
Year	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
Totals	1,192	759	660	641	454	813	700
	3,706					Projected five year housing delivery for 2024/25 to 2028/29	

- 4.3. The net number of deliverable dwellings in the five years from 1 April 2024 to 31 March 2029 is **3,706** as shown in above. This is the figure used to calculate the five year housing land supply position at the 2024 monitoring point (see Section 5 of this report). The average yearly deliverable dwellings in the next five years is 741.2.

### Forecast/Projected East Devon district housing trajectory to 2031

4.4. The graph below shows the breakdown of different sites making up the housing trajectory projected to 2031. This is not intended to give a precise year-on-year prediction of how many new homes will be built each year, but is output from applying the methodology for calculating development and gives an overview of the potential future pattern of development.

**GRAPH 1: Projected housing trajectory to 2031**



4.5 The table below shows all the data used for the various components of supply and projections in the graph above.

**TABLE 14: Data for overall housing trajectory graph**

Period	West End Completions	Rest of East Devon Completions	West End Projections	Cranbrook expansion zones projections	Rest of East Devon Projections	Additional Windfalls	Total Comp/Pro
13/14	486	344					830
14/15	531	498					1,029
15/16	403	624					1,027
16/17	335	389					724
17/18	326	540					866
18/19	392	537					929
19/20	560	505					1,065
20/21	455	412					867*
21/22	568	471					1,039*
22/23	555	443					998*
23/24	274	349					623*
24/25			466	0	726	0	1,192
25/26			372	0	275	112	759
26/27			217	80	243	120	660
27/28			150	235	137	119	641
28/29			110	285	24	35	454
29/30			115	402	176	120	813
30/31			80	438	62	120	700

\*After MHCLG adjustments for care home beds have been made

### Natural England – River Axe phosphate levels

- 4.6 Due to Natural England advising that we should no longer grant planning permission for development that would increase the discharge of phosphates into the River Axe, several sites with outline / reserved matters planning permissions have been excluded from the forecast deliverable supply calculations. There is, however, potential for permissions to be accepted which show effective mitigation for nutrient neutrality.

4.7 The River Axe catchment area is shown below and can be seen to stretch into both Somerset and Dorset, outside of the East Devon District Council boundary.

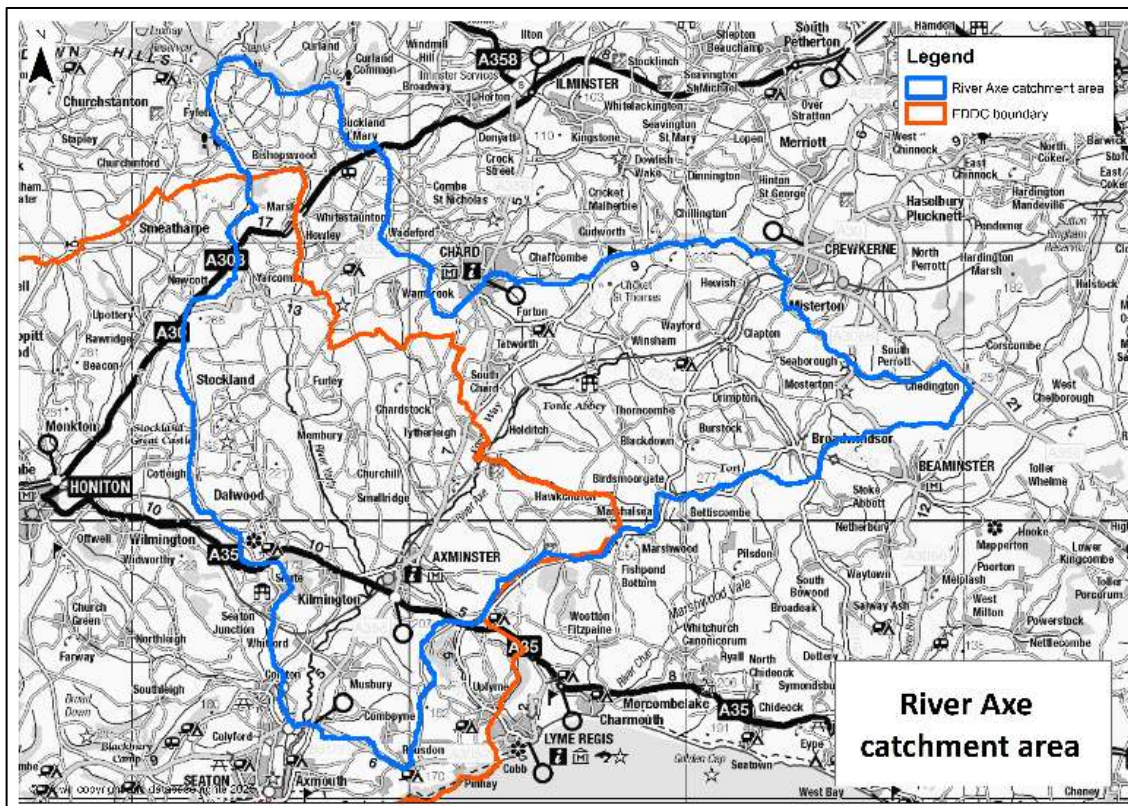


FIGURE 1: Map of River Axe catchment area

4.8 Government has signalled the potential for changes to legislation regarding nutrient neutrality and development. The Council will continue to monitor any future changes to legislation, planning policy and guidance regarding this matter.

## 5 District Four and Five Year Housing Land Supply Position

- 5.1 The aim of demonstrating a five year land supply is to prove that there is enough housing coming forward to meet requirements. On top of this, the current Government is seeking to increase housing delivery in the immediate future by requiring councils to demonstrate a minimum of 20% in places where delivery has persistently been below requirements.
- 5.2 This council does not have a pattern of persistently delivering below housing requirements (when measured against Local Plan targets or, more so, Government Housing Delivery Test numbers).
- 5.3 The adopted Local Plan has a housing requirement of 17,100 new homes for the 2013-2031 plan period, equivalent to an average of 950 dwellings per annum. However, now the plan has been adopted for more than five years, we refer to latest Government guidance. The latest guidance indicates we should be using a baseline figure of **893** dwellings per annum. If adopted, a new version of the NPPF (that was consulted on shortly after the new Government came to power in Summer 2024) would see this baseline figure rise further.

**TABLE 15: Five year requirement – Split between West End and Rest of East Devon**

East Devon and sub-area housing requirement for 1st April 2024 to 31st March 2029					
	Calculation	Rest of East Devon	West End	EDDC Total	Supply sources
A		341	552	893	Basic annual requirement*
B	Ax5	1,707	2,758	4,465	Five year requirement target
C	B/5	341	552	893	<b>Annual target</b>

**TABLE 16: Five year supply – Split West End and Rest of East Devon**

Supply sources at 31 March 2024 with realistic prospects of delivering dwellings 1st April 2024 to 31st March 2029					
	Calculation	Rest of East Devon	West End	EDDC Total	Supply sources
D		1,405	1,315	2,720	Extant permissions

E		0	600	600	Cranbrook Plan DPD expansion zones (allocations) - unconsented**
F		148	238	386	Future windfalls
G	D+E+F	1,553	2,153	3,706	Total five years deliverable supply
H	B-G	154	605	759	Five year shortfall or supply figure
		<b>SHORTFALL</b>	<b>SHORTFALL</b>	<b>SHORTFALL</b>	Shortfall or Supply
<b>Five year housing land supply position at 2024 monitoring point</b>					
I	G/C	<b>4.55</b>	<b>3.90</b>	<b>4.15</b>	<b>Years of land supply</b>

\* Annual requirement based on Local Housing Need (standard method)

\*\* Planning applications on 3 of the 4 Cranbrook expansion areas received Planning Committee 'Resolution to grant approval' after the 2023 Monitoring Point

### Housing land supply position – EDDC Total

5.4 At 31 March 2024, East Devon District Council can demonstrate a **4.15** year housing land supply position against the Local Housing Need of 893 dwellings. The total number of dwellings deemed deliverable in the 5-year period being 3,706 dwellings. Comparing the 3,706 forecast 5 year supply (including dwelling equivalents from care homes) to the 4,465 net dwellings five year requirement indicates a district supply shortfall of **759** dwellings.

5.5 Therefore, EDDC cannot demonstrate a five year supply of deliverable sites at 31 March 2024. However, not being able to demonstrate a 5YHLS is, at time of publishing, only relevant to plan adoption.

5.6 EDDC is in a transitional period between local plans meaning it satisfies the conditions set out in paragraph 226 of the NPPF:

*Paragraph 226 sets out criteria where, for a period of two years from the date of publication of the National Planning Policy Framework published on 19 December, an authority only needs, for the purposes of decision-making, to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of four years' worth of housing (with a buffer, if applicable) against either its housing requirement figure or LHN as appropriate.*

5.7 Meeting the conditions of paragraph 226, above, results in the council being required to demonstrate a 4 year housing land supply, this is described in paragraph 55:

*Where authorities meet the requirements of paragraph 226 of the National Planning Policy Framework, they only need to demonstrate a 4 year housing land supply (for decision making purposes only). References in this guidance to 5 year housing land supply in relation to decision-*

*making will need to be read as relating to 4 year housing land supply, where appropriate. For clarity, this does not apply to the sections of the guidance concerned with Annual Position Statements.*

- 5.8 Having a 4.15 housing land supply figure demonstrates the council can demonstrate four year supply of deliverable sites at 31 March 2024. In effect, acting as if a 5YHLS position was able to be demonstrated outside of a transitional period.
- 5.9 Details on the housing land supply figure calculation and four and five year housing land position can be found online at:
- <https://www.gov.uk/guidance/housing-supply-and-delivery>
- 5.10 The results and conclusions in this document supersede all previous East Devon Housing Monitoring Updates reports regarding the four and five year housing land supply position.
- 5.11 Finally, for the avoidance of doubt, the four or five year housing land supply assessment does not prejudice or predetermine the rolling five year housing land supply assessment to be made in the future relating to the emerging East Devon Local Plan, including the five year land supply position at the anticipated point of plan adoption. The rolling five year housing land supply assessment for the Local Plan will need to be consistent with NPPF and PPG specifically regarding plan-making.

### **Housing land supply position – West End and Rest of East Devon split**

- 5.12 The adopted local plan encompasses a spatial strategy that includes two sub areas – the West End of East Devon and the Rest of East Devon. The 893 annual district basic requirement shown in above is split into the two sub areas, and a five year housing supply position is calculated for the two sub areas as follows.
- The adopted local plan requirement figure of 17,100 is split into the two sub areas:
    - 10,563 dwellings in the West End (61.77% of the total)

This is based on the 10,563 supply-side policy figure in Strategic Policy 2 in the adopted Local Plan. Note the supply forecast in Appendix 2 of the adopted local plan had a NIL windfall allowance for the West End.
    - 6,537 in the Rest of East Devon (38.23% of the total)

This is based on the residue of the district requirement figure after subtracting the West End supply policy figure. Note: The aggregated supply side policy figure of 5,830 for the Rest of East Devon in Strategic Policy 2 in the adopted Local Plan excludes the windfall allowance for the Rest of East Devon that is shown in Appendix 2 of the adopted Local plan).
  - The Sub Area proportions of the district figure of 893 in the table above are therefore:
    - West End 61.77% (i.e. 552 p.a.)
    - Rest of East Devon 38.23% (i.e. 341 p.a.)

5.13 Consequently, applying the five year housing land supply calculation in 0 table above split into the two sub areas results in the following five year housing land supply positions:

- West End 3.90 years supply
- Rest of East Devon 4.55 years supply

5.14 The calculation shows the impact of the West End sites on supply. They are the principal reason for the council being unable to demonstrate a district five year housing land supply position for NPPF paragraph 77 purposes. However, action to rectify the sub area position has occurred, namely:

- The Cranbrook Plan DPD was adopted in the monitoring year 2022/23; and
- In three of the four Expansion Areas, there are recent planning applications where Planning Committee resolved to grant planning approval, subject to S106 agreements, since the 2023 Monitoring Point.

5.15 East Devon district council is in the process of adopting a new local plan. A new local plan allows for the Local housing need figure to be adjusted in line with the NPPF. Proposed reforms to the NPPF went out for consultation in September 2024 and the response to consultation is yet to be published. Although, at time of publishing, changes have not been finalised east devon is expected to see an increased local housing need figure. This new LHN figure will likely require an early review of the 5YHLS. Proposed reforms to the NPPF are available online at:

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

## 6 Delivery compared to adopted plan trajectory

6.1. **Error! Reference source not found.** table below compares the 2024 monitoring point completions and projections with the adopted East Devon Local Plan 2013 to 2031 housing trajectory over the plan period. The difference in delivery can be seen annually and are cumulatively totalled to show the difference between the local plan trajectory, the completions, and most recent projections.

**TABLE 17: Comparison of Local Plan and 2024 trajectories**

Period	2024 monitoring point total annual completions and 2024 trajectory Projections	Local Plan 2013 -31 trajectory - Annual Completions / Projections	Over / Under delivery compared to local plan trajectory	Cumulative difference between Local Plan 2013 -31 trajectory and 2024 monitoring point data
13/14	830	824	6	6
14/15	1,029	1,089	-60	-54
15/16	1,027	1,191	-164	-218
16/17	724	1,261	-537	-755
17/18	866	1,455	-589	-1344
18/19	929	1,464	-535	-1879
19/20	1,065	1,287	-222	-2101
20/21	867*	1,553	-686	-2787
21/22	1,039*	1,295	-256	-3043
22/23	998*	1,092	-94	-3137
23/24	623*	1,041	-418	-3555
24/25	1192	1,012	180	-3375
25/26	759	830	-71	-3446
26/27	660	691	-31	-3477
27/28	641	566	75	-3402
28/29	454	551	-97	-3499
29/30	813	551	262	-3237
30/31	700	565	135	-3102
TOTAL	15,216	18,318		

\*Assumes MHCLG adjustments for care home beds have been made

- 6.2 The table above clearly shows that the delivery forecasts in the Local Plan trajectory are now not expected to be achieved. Those forecasts were ambitious. They also pre-date the latest Planning Practice Guidance on Housing supply and delivery. The Covid 19 pandemic impacted on delivery in 2020/21. Furthermore, delivery on strategic allocations has been delayed, notably due to:
- the lack of funding for the Axminster relief road and now the nutrients neutrality constraint has prevented the previously forecast early delivery of the strategic allocation at Axminster (in the Rest of East Devon) between 2017/18 and 2025/26;
  - the timing of the Cranbrook Plan DPD inspector's report, and subsequent plan adoption, which has led to longer forecast lead in times for applications in the Expansion Areas.
- 6.3 In producing the trajectory for the 2024 Housing Monitoring Update, the council is aware that work is currently in progress in on the emerging East Devon Local Plan 2020 to 2042. The NPPF requires the Council to demonstrate that the emerging plan has a five year supply at the point of plan adoption.

## 7 APPENDIX 1 - Local housing need calculation

- 7.1 Government guidance on calculating local housing is set out in the Planning Practice Guide: Housing and economic needs assessment. Please see the guidance for further explanation. The Council has applied this guidance to calculate the local housing need for East Devon for use in the five year housing land supply calculation as at the 2024 monitoring point. The calculations are as follows:

**TABLE 18: Average annual increase in households**

<b>EAST DEVON ONS HOUSEHOLD PROJECTIONS</b>		
<b>A</b>	Projected households 2024	66,905
<b>B</b>	Projected households 2034	73,408
<b>C</b>	Projected increase in households 2024-2034 ( $B-A$ )	6,503
<b>D</b>	Annual projected increase in households 2024-2034 ( $C/10$ )	650.30

**TABLE 19: 2023 affordability ratio**

<b>EAST DEVON ONS AFFORDABILITY RATIO</b>		
	<i>House price to workplace-based earnings ratio (published March 2024)</i>	
<b>E</b>	East Devon median house prices 2023	£350,000
<b>F</b>	East Devon median workplace earnings 2023	£35,058
<b>G</b>	East Devon affordability ratio ( $E/F$ )	9.98

**TABLE 20: Adjustment Factor Calculations**

<b>Calculation of Adjustment Factor (based on PPG standard method)</b>
Adjustment factor is calculated as follows = $((((9.98 - 4) / 4) * 0.25) + 1)$
$9.98 - 4 = 5.98$
$5.98 / 4 = 1.495$
$1.495 * 0.25 = 0.37375$
$0.37375 + 1 = \mathbf{1.37375}$

**TABLE 21: 2024 Monitoring Point East Devon Local Housing Need**

	<b>EAST DEVON LOCAL HOUSING NEED</b>	
<b>H</b>	Adjustment factor (PPG method)	1.37375
<b>I</b>	Annual projected increase in households 2024-2034 ( <i>D</i> )	650.30
<b>J</b>	Local Housing Need (annual) ( <i>I * H</i> )	893