

VGS submission to ED Local Plan consultation – focussing on meeting housing needs – March 2025 – final version

https://www.eastdevon.gov.uk/local-plan/?fbclid=IwY2xjawJMEWhleHRuA2FlbQIxMAABHa6mqiM5xHNaiMdwOSdHXsGq1v2hZSBbKnYJxTTrTDEv_2Z6HdSi61wmQ_aem_4OKuz1vh5jwgRudkR9s83Q

<https://eastdevonlocalplanreg19.commonplace.is/>

<https://eastdevonlocalplanreg19.commonplace.is/en-GB/proposals/meeting-housing-needs/step1>

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8. Meeting Housing Needs

1. To which part of the Meeting Housing Needs chapter does your representation relate

Select one option: **Policy HNO3: Housing to meet the needs of older people**

2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?

Select one option: **Yes**

2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.

We wish to challenge this Policy's justifications: see Point 3 below

3. Do you consider that this part of the Meeting Housing Needs chapter is sound?

Select one option: **No**

3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.

THE ED LOCAL PLAN WILL NOT SATISFY HOUSING NEED IN SIDMOUTH; RATHER, IT WILL ENSURE THAT SIDMOUTH WILL BECOME EVEN MORE OF AN 'UNBALANCED COMMUNITY'.

The 2017 Housing Needs Assessment for Sidmouth commissioned by Sidmouth Town Council [<https://sidmouth.gov.uk/wp-content/uploads/2020/12/Housing-Needs-Assessment.pdf>] formed the basis of the Housing Policies of the 2019 Sid Valley Neighbourhood Plan – which sought to satisfy housing need in Sidmouth.

[<https://visionforsidmouth.org/the-sid-valley-needs-more-of-the-right-sort-of-housing/>]

It made clear that the planning authorities should focus on providing for the needs of its local population, especially its younger residents:

“One key part of the plan is making sure affordable homes in the valley go to local people, particularly the area’s young people. Affordable homes will only be allocated to people who have a connection to the Sid Valley.” [See Policy 13 of the SVNPN: Connection]

A newly-commissioned Housing Needs Assessment for Sidmouth [<https://sidmouth.gov.uk/wp-content/uploads/2024/01/PL.-MINS.-290125-1.pdf>] has been presented to Sidmouth Town Council – and reiterates the failure of the planning authorities to provide for the needs of its residents:

“The survey concluded that Sidmouth was not a balanced community and provided pertinent data which should be relevant for the new Local Plan, any planning applications within Sidmouth.” [Housing Needs Survey undertaken by CNB Housing Insight: 2025]

The survey was attached to the agenda of the Town Council’s planning committee [<https://sidmouth.gov.uk/wp-content/uploads/2024/01/290125-Planning-Agenda-.pdf>] meeting in January – and has been passed on with permission.

The following extracts are specific for Sidmouth – the details of which seriously undermine the justifications as laid out in Policy HNO3 of Meeting Housing Needs of the ED Local Plan, as this Policy fails to address the imbalance of housing provision. Rather, the focus of the Housing Needs Assessment for Sidmouth is on the 'need' to provide social and affordable housing – and not to consider market housing at all as part of any mix of provision:

“Overall conclusions: There is significant need for additional affordable housing, both for general needs and special need for older people in Sidmouth on an annual basis according to our analysis of numbers on the East Devon housing register and analysis of projections for older people.

“Overall, Sidmouth will continue to attract incomers and concern is highlighted that local people may not be able to find suitable accommodation that they can afford in Sidmouth. This will worsen an already unbalanced community and affect social cohesion and the long term sustainability of the parish to sustain the support and services needed to sustain the aging population. [Final Housing Needs Assessment for Sidmouth Town Council: October 2024]

“An additional 65 to 67 units of general needs affordable housing are needed per-annum if the flow of those in affordable need arising from local people is to be met. If the needs of incomers are taken into account, unmet affordable need rises considerably to between 155 and 157 dwellings per-annum.

“Sidmouth is not a balanced community. Factors driving the above growth are older people being attracted to Sidmouth which leads to an imbalance of age groups in the parish skewed toward older people, high house prices and rents compared to East Devon, and an aging population. East Devon projects a district wide growth of 24,274 people aged over 65 by 2043.” [Housing Needs Assessment for Sidmouth Town Council SYNOPSIS January 2025]

This analysis simply confirmed what was already understood. In terms of a 'balanced community', in 2019, Sidmouth was singled out as one of the towns facing the biggest increase in the elderly in the country [<https://visionforsidmouth.org/sidmouth-is-singled-out-as-one-of-the-towns-facing-the-biggest-increase-in-the-elderly/>]

THE ED LOCAL PLAN DOES NOT RECOGNISE THE DIFFERENCE BETWEEN HOUSING 'NEED' AND HOUSING 'DEMAND'.

In his granting last month of the Knowle planning appeal for the provision of 'housing with care' and a care home, [<https://visionforsidmouth.org/breaking-planning-inspector-allows-knowle-planning-appeal/>] the housing inspector made the point that “There is no doubt that there is a clear and pressing need for this type of development in East Devon”.

This view was strongly contested by all the parties in Sidmouth – and should be addressed by the ED Local Plan to ensure that any similar planning decisions cannot be justified in future. In particular what must be addressed is the assumption made by the inspector that 'demand' for market housing is the same as 'need' for social and affordable housing.

This has already been challenged and should be taken into account by the planning authorities. In 2017, the CPRE looked at the phenomenon of 'Needless Demand', where they asked: What's the difference between 'need for housing' and 'demand for housing'? This study should be included in any analysis of planning for housing provision in East Devon. [<https://futuresforumvgs.blogspot.com/2017/09/needless-demand-or-whats-difference.html>]

This question had also been asked at Devon County Council, in 2013, when Cllr Julian Brazil noted that “it would be impossible to build to meet demand because there is a never-

ending queue of people who want to move to Devon.”

[<https://futuresforumvgs.blogspot.com/2013/11/housing-it-would-be-impossible-to-build.html>]

This is directly referred to in point 6.5 of the 2024/25 Housing Needs Assessment for Sidmouth, which states:

“Overall, Sidmouth will continue to attract incomers and concern is highlighted that local people may not be able to find suitable accommodation that they can afford in Sidmouth. This will worsen an already unbalanced community and affect social cohesion and the long term sustainability of the parish to sustain the support and services needed to sustain the ageing population.”

As pointed out by observers [<https://futuresforumvgs.blogspot.com/2013/12/migration-sidmouth-and-east-devon.html>] the fact is that Sidmouth is largely made up of ‘migrants’ from elsewhere in the UK, that the town has long been a retirement haven for the well-heeled, and that it has always attracted people from outside the area – the 2011 Census detailing that the migration of population into East Devon from other parts of the UK show that there were 1130 more people moving into the area than out.

[www.eastdevon.gov.uk/knowning_east_devon_version_1.0-2.pdf and

<https://visionforsidmouth.org/housing-need-and-net-migration-incomers/>] This trend should be taken into consideration by the planning authorities: “the migration of population into East Devon from other parts of the UK show that in 2017 there were 2,620 more people moving into the area than out”. [<https://eastdevon.gov.uk/council-and-democracy/knowning-east-devon/knowning-east-devon-summary/people/>]

THE ED LOCAL PLAN SHOULD SUPPORT DEVELOPMENT BY SECURING A MORE DIVERSE SUPPLY OF AFFORDABLE HOUSING FOR OLDER AND YOUNGER PEOPLE IN SIDMOUTH

In conclusion: Policy HNO3: Housing to meet the needs of older people in the ED Local Plan fails to address the central issue of creating balanced communities and therefore cannot be justified. Instead, the Policy should read: “the Council should not support development which encourages a still larger supply of market housing for older people in Sidmouth”.

The market already caters for the 'demands' of incomers; the council should intervene to ensure that it meets the 'needs' of the already-resident older and younger people of Sidmouth by enabling the better provision of social and affordable housing.

The Strategic Policy HNO1 does indeed “Seek to maximise the delivery of affordable housing across East Devon in order to meet identified needs of people who are not able to access the general housing market” [which includes “market housing for rent as well as for home ownership”]; and to realise this, Policy HNO2 states that “To foster balanced and mixed communities affordable housing will be required on all developments” [35% affordable housing – with 65% of that as Social Rent].

However, this is undermined by Policy HNO3: by stating that “the Council will support development that widens choice by securing a more diverse supply of market and affordable housing for older people in East Devon”, the Council will simply encourage more of the Knowle-type development, namely further ghettoised accommodation for the elderly from outside East Devon who can afford such 'market housing'.

There it not a “growing need for diverse housing options for East Devon's ageing population” as stated in the Justifications; rather, there is a growing market 'demand' for such which must be countered by more robust determination to ensure a more truly balanced community, whereby younger and less affluent elderly populations can be properly catered for.

The other HN Policies do indeed demonstrate such a determination and should be praised for doing so; however, these are undermined by the overenthusiastic embrace of 'a more diverse supply of market housing' in Policy HNo3 which cannot be justified.

Finally, East Devon requires accommodation which can work just as well as starter homes as they do as end-of-life homes; rather than thinking in terms of age range, planners and indeed developers should be thinking in terms of function. Homes which are easy to maintain and use should appeal to both elderly and those starting out – as dealt with in Policies NH04, 06 and 08 – all of which would be negated by encouraging the development of age-restricted gated communities for 'the market', as at Knowle.

Sidmouth is a vibrant community, “where over-90s are having the time of their lives”: as reported recently, “the Devon town has only 842 residents under 30 – and 1,100 over 80 – and yet somehow it works, thanks to a strong sense of community and plenty of willing volunteers.” Sidmouth can adapt and can develop, based on this community spirit – and yet too much specialist market housing for the incoming elderly will threaten this vibrancy, as evidenced in the Housing Needs Assessment.

[<https://www.thetimes.com/uk/society/article/welcome-to-sidmouth-where-over-90s-are-having-the-time-of-their-lives-pklo7sch6>]

3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Meeting Housing Needs chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

Generally, the Policies of the Meeting Housing Needs chapter are sound. Nevertheless, the October 2024 Housing Needs Assessment, commissioned by Sidmouth Town Council – specifically the recommendations under 6.11 – should be referenced in the Meeting Housing Needs chapter 8 of the ED Local Plan in order to make it more sound:

“Many housing and accommodation issues are identified in the HNA report and the town council may also wish to consider how better use can be made of the housing stock to address its aims. The following could be considered:

- engaging with land owners and housebuilders and asking them to deliver a mix of housing and accommodation that would more closely meet local need;
- enabling a small annual programme of newbuild affordable homes prioritised to meet local need. In this way the most urgent need will be met;
- recognising that suitable exception sites will both help deliver an annual supply of affordable housing and ensure that local people benefit from this supply;
- enabling a supply of additional affordable specialised housing for older people which will indirectly assist in housing younger households due to vacancies in the system;
- forming partnerships with housing associations so that small scale development opportunities can address local need; consideration of innovations such as encouraging local people to form and deliver community led housing schemes, possibly by means of a Community Land Trust;
- working with the district Council to agree a Sidmouth Parish local lettings policy and reviewing local connection criteria that would apply to Sidmouth that would ensure that local needs are prioritised and enable younger people to return to the parish; and
- working with the district council to develop policies that minimise vacant homes and discourage second homes.

4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?

Select one option: **Yes**

4(a). If yes, and you wish to support this part of the Meeting Housing Needs chapter's compliance with the duty to co-operate, please use this box to set out your comments.

We wish to challenge this Policy's justifications: see Point 3 above

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Select one option **No, I do not wish to participate in hearing session(s)**

Do you have any files to upload to support this submission? (Please submit this document only once across all your submissions).

Housing Needs Assessment, commissioned by Sidmouth Town Council: October 2024

Housing Needs Survey undertaken by CNB Housing Insight: 2025

Housing Needs Assessment for Sidmouth Town Council SYNOPSIS January 2025