



Planning policy

Housing Monitoring Update

Up to 31 March 2025



November 2025

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1 Introduction

- 1.1. This document provides the housing monitoring update for East Devon District Council (EDDC) to a base date of **31 March 2025**. 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 provides the current five year housing land supply position for East Devon district as of 31 March 2025 and the necessary supporting evidence. The five year housing land supply is to be used in the operation of NPPF paragraph 78 for development management purposes. The housing supply position covers the five year period from 1st April 2025 to 31st March 2030. It applies from the day after this document is published.
- 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 2025 as an Annual Position Statement to 'confirm' the five year housing land supply position for the purposes of NPPF Paragraph 78 and 79 (and PPG Housing supply and delivery paragraphs 12 to 18 and 60).
- 1.5. The most recent at time of publishing National Planning Policy Framework, December 2024, can be found on-line at:
https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.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>

- 1.6. This report considers the following:

Housing completions since 1st April 2013, and in particular the completions over the last 12 month period (1 April 2024 – 31 March 2025) 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 2025 to the end of the adopted Local Plan period.

The East Devon five year housing land supply position as of 31 March 2025 (for the period 1 April 2025 to 31 March 2030) 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.

2 Completions 2024-25

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 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) revised in 2021, states that care

Commented [JD1]: Good catch James. I've looked at the HELAA report so many times that I should really know when it was published!

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 Net completions have fluctuated in the period 2013 to 2025. 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. Net completions take into account losses, in this case demolitions or changes of land use away from residential and as a result, is lower than the gross figures detailed later in the report.
- 2.8 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.
- 2.9 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.

Commented [MD2]: Be good to add a definition of where/what the West End is.

TABLE 3: Net Total Completions 2013 to 2025 – 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	Apr 24 to Mar 25
West End	486	531	403	335	326	392	560	455	568	518	358	393
Rest of	344	498	624	389	540	537	505	417	479	443	276	

	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	Apr 24 to Mar 25
East Devon												297
Annual TOTAL	830	1,029	1,027	724	866	929	1,065	872 Revised to 867 by the MHCLG after taking the net loss of 9 care home bedrooms into account	1,047 Revised to 1,039 by the MHCLG after taking the net loss of 15 care home bedrooms into account	961 Expected to be revised to 998 by the MHCLG after taking the net gain of 67 care home bedrooms into account	634 Expected to be revised to 623 by the MHCLG after taking the net loss of 20 care home bedrooms into account	690 Expected to be revised to 696 by the MHCLG after taking the net gain of 12 care home bedrooms into account

Key monitoring indicator results

- 2.10 Based on the table above, there were **10,674** net total dwelling completions in East Devon (excluding dwelling equivalents from care home accommodation) from 1 April 2013 to 31 March 2025; **690** of these were in the 2024/25 monitoring year. Resulting in an average of 890 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 **891** 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 **845** per year, which is below the adopted local plan housing requirement of 950, the revised LHN of 1156, and annual target of 1168. 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 2025 Monitoring Point.

Completions by parish

- 2.12 The table below shows gross completions during the 2024/25 monitoring period by parish. Parishes where there were no 2024/25 completions are not listed. Town councils are highlighted in yellow.

TABLE 4: Gross dwelling completions by parish

Parish	Total	Parish	Total
Awliscombe	3	Gittisham	13
Axminster	23	Honiton	55
Beer	3	Kilmington	1

Commented [JC4]: @Joseph Dunnett Has this been confirmed yet (i.e. no need to say 'expected to be')?

Commented [JD5R4]: I cant seem to find the right live table to see what they have adjusted the figure to, if they have indeed adjusted the figures

It feels like it should be here but I have downloaded and viewed each of the table and I'm still none the wiser?

Housing supply: net additional dwellings - GOV.UK

Commented [JC7]: @Joseph Dunnett Has this been confirmed yet (i.e. no need to say 'expected to be')?

Commented [JC3]: HDT 2023 says 904
https://assets.publishing.service.gov.uk/media/6759ccfbad4694c785b0eddb/Housing_Delivery_Test_2023_measurement.ods

Commented [JC6]: HDT 2023 says 996
https://assets.publishing.service.gov.uk/media/6759ccfbad4694c785b0eddb/Housing_Delivery_Test_2023_measurement.ods

Commented [MD8]: Might want to note that gross completions are very similar to but marginally differ from net completions as they do not take account of very small number of losses of existing dwellings (I assume this is the reason).

Broadclyst	222	Newton Poppleford and Harford	1
Broadhembury	5	Offwell	2
Buckerell	1	Ottery St. Mary	15
Budleigh Salterton	1	Plymtree	1
Clyst St. George	1	Rockbeare	1
Clyst St. Mary	1	Seaton	18
Colaton Raleigh	1	Shute	1
Colyton	1	Sidmouth	1
Combe Raleigh	1	Sowton	1
Cranbrook	172	Talaton	3
Dunkeswell	9	Uplyme	2
East Budleigh	1	Upottery	2
Exmouth	139	Upton Pyne	1
Farringdon	2	Yarcombe	1
		Grand Total	705

Completions by settlement

- 2.13 The table below shows gross completions during the 2024/25 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 (BuAB) of the settlements or by very close proximity where settlements don't have BuAB. Settlements where there were no 2024/25 completions are not listed.

TABLE 5: Gross dwelling completions by settlement

Settlement*	Total	Settlement*	Total
Axminster	23	Kerswell	2
Beer	3	Newton Poppleford	1
Broadclyst	1	North of Blackhorse	94
Budleigh Salterton	2	Ottery St Mary	2
Clyst Honiton	35	Payhembury	3
Clyst St George	1	Pinhoe	71
Clyst St Mary	2	Rural areas	31
Colyton	1	Seaton	18
Cranbrook	172	Sidmouth	1
Dunkeswell	1	Uplyme	2
Dunkeswell (Highfield)	8	Upton Pyne	1
Exmouth	139	West Clyst	20

Commented [MD9]: Does this need qualifying or extra text adding as Weston, Honiton (I assume, but not sure where the reference refers to) does not have a Built-up Area Boundary. Or should the text refer to at/or around the settlement noting the section below. Also, perhaps for the future, is there any merit in have this section and the next? They end up saying very similar things.

Farringdon	1	Weston, Honiton	2
Honiton	68	Grand Total	705
<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 2024/25 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 2025. Those BuABs where there were no 2024/25 completions are not listed.

TABLE 6: Gross dwelling completions by BUAB

BuAB	Total	BuAB	Total
Axminster	23	Newton Poppleford	1
Beer	3	North of Blackhorse	94
Broadclyst	1	Open Countryside	126
Budleigh Salterton	1	Ottery St Mary	2
Clyst St Mary	1	Pinhoe	72
Colyton	1	Seaton	18
Cranbrook	166	Sidmouth	1
Exmouth	139	Uplyme	1
Honiton	55	Grand Total	705

Completions split by Greenfield / brownfield

2.15 The table below shows the breakdown of gross completions between greenfield and brownfield sites during the 2024/25 monitoring period.

TABLE 7: Gross dwelling completions by Greenfield/Brownfield

		Dwellings	%
Greenfield	General Greenfield	537	95%
	Garden Greenfield	18	3%
	Greenfield Ag/Forestry Building Conversion	12	2%
	Total	567	80%
Brownfield	Brownfield Redevelopment	107	78%
	Brownfield COU	31	22%

	Total	138	20%
	GRAND TOTAL	705	100%

- 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 80% of completions in the district during the 2024/25 monitoring period were on greenfield sites, which is 5% more than during the 2023/24 monitoring period.

Affordable completions

- 2.18 The Housing Strategy and Enabling team report a total of 236 affordable units delivered during 2024/25, including 36 for social rent, 95 for affordable rent and 105 shared ownership.

Key facts for the year

- EDDC acquired 10 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
- 74 affordable homes have been completed at Cranbrook
- 15 affordable homes completed at Exmouth – Plumb Park
- 33 affordable homes at Pinhoe
- 95 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.

Commented [MD10]: Did we ever get to a point where we have a site by site breakdown of all affordable houses that have been delivered through new developments. This figure presumably includes these three bullet pointed items but what about the top bullet pointed one.

Commented [JD11R10]: There is a completions by year breakdown that Cassandra has worked on (I haven't spent much time trying to understand the figures but they are there) alongside a trajectory of future affordable completions. Tim has worked through the additional affordable completions brought forward by allocations using policy using % affordable figures, resulting in a affordable trajectory.

2.20 The table below shows that over the past 12 months 308 of the 690 net completions have been windfalls. This equates to 45% of net completions in the last year. Of these 308 net windfall completions, only 83 were in the West End with the remaining 225 in the Rest of East Devon. Resulting in 27% being in the West End and 73% in the Rest of East Devon.

TABLE 8: Net windfall completions (excluding garden-greenfield sites)

Gross site capacity	1-2 dwellings*	3-5 dwellings*	6-9 dwellings*	10-20 dwellings*	21+ dwellings*	TOTAL
RoED	46	32	20	7	120	225
West End	2	0	1	5	75	83
TOTAL	48	32	21	12	195	308
Percentage	15.6%	10.4%	6.8%	3.9%	63.3%	100%

*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 care home had seen new beds created in the 2024/25 monitoring year in East Devon district: The Curlews, Exmouth (12 bedrooms). It is anticipated this will result in a net gain of the equivalent of 6 dwellings once confirmed by the MHCLG.
- 2.23 No gains of shared accommodation, such as student accommodation occurred in the 2024/25 monitoring year.

Commented [JC12]: @Joseph Dunnet This contradicts Table 3 and paragraph 2.22

3 Projections 2025-2029

- 3.1 This section is an assessment of forecast and projected completions for the remainder of the plan period from 1 April 2025 to 31 March 2031. The forecasts and projections can be broken down into:
- Sites with extant permissions at the 2025 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 2025 Monitoring Point).
 - Cranbrook expansion zones:
 - These are forecast completions on the four Cranbrook expansion areas – Treasbeare, Bluehayes, Cobdens and Grange are allocated in the Cranbrook Plan DPD adopted 19 October 2022. These include sites with recent Planning Committee resolutions to grant planning approval subject to completion of S106 agreements and have begun to gain outline and reserve matters permissions.
- 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 may be reallocated in the new local plan.
- 3.3 Annex 3 of 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). 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 1st April 2025. 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 2025.

Windfall projections

- 3.7 As mentioned, paragraph 75 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 2020 to 31 March 2025).
- 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 2020-2025

Gross site capacity	Apr 2020 to Mar 2021	Apr 2021 to Mar 2022	Apr 2022 to Mar 2023	Apr 2023 to Mar 2024	Apr 2024 to Mar 2025	Average per year
1-2 dwellings	50	58	43	35	48	46.8
3-5 dwellings	30	19	17	25	32	24.6
6-9 dwellings	35	3	26	14	21	19.8
10-20 dwellings	22	47	32	11	12	24.8
Totals	137	127	118	85	113	116

- 3.10 The table above identifies a basic net average windfall projection of 116 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:

Commented [JC13]: [@Joseph Dunnet](#) I think this reference may now be paragraph 75? Please check!

TABLE 11: Adjusted windfall projections 2025-2030

Final projected windfall allowance	2025 to 2026	2026 to 2027	2027 to 2028	2028 to 2029	2029 to 2030	Total
Total windfalls with permission (A)	767	151	33	30	20	1,001
<i>Of which windfalls that are on sites of 20 or less dwellings and not on garden-greenfield land (B)</i>	427	14	5	0	0	446
Basic windfall projection (C)	116	116	116	116	116	580
Total eligible net windfalls (D)	116	14	5	0	0	135
Adjusted windfall projection (E) (C-D)	0	102	111	116	116	445

- 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 of March 2025. These sites are forecast for completion in the five year period 1st April 2025 to 31 March 2030 and total 445 dwellings.
- 3.12 Because there are more permissions (total eligible net windfalls) than the basic windfall projection (the 116 per year in row C in the table above) in 2025/26, we cannot increase our predicted number of completions in that monitoring year. Therefore, the adjusted additional windfall in 2025/26 is nil.
- 3.13 In the periods 2026/27 through to 2029/30, 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 **445** 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 2025 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	Total Commitments	Non-Major / Small sites	Major / Large sites (excluding Cranbrook expansion sites)	Cranbrook expansion zones	Exeter HMA HELAA calculated additional predicted windfalls	Total projections
2025/26	1,157	513	644	0	0	1,157
2026/27	701	0	676	25	102	803
2027/28	581	0	481	100	111	692
2028/29	573	0	283	290	116	689
2029/30	635	0	155	480	116	751
2030/31	767	129	193	445	116	883
2031/32	425	0	15	410	116	541
Total	4,839	642	2,447	1,750	677	5,516

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

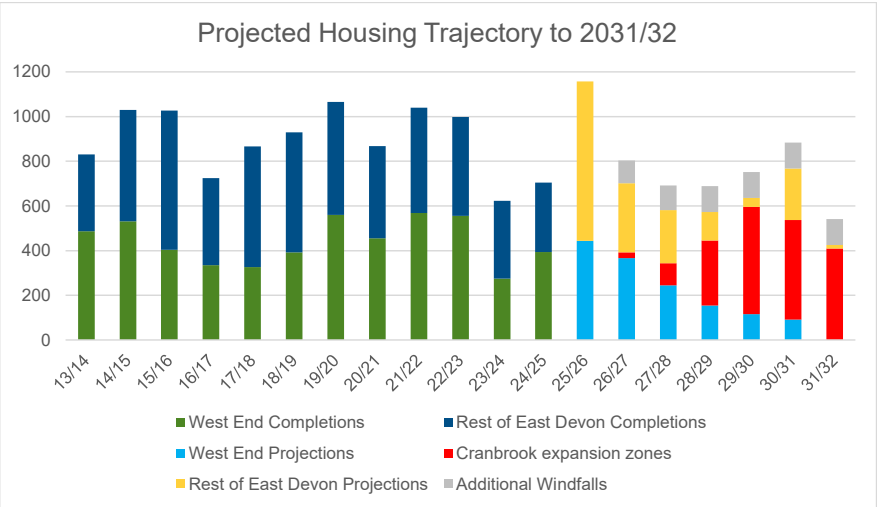
Year	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
Totals	1,157	803	692	689	751	883	541
	4,092					Projected five year housing delivery for 2025/26 to 2029/30	

- 4.3. The net number of deliverable dwellings in the five years from 1 April 2025 to 31 March 2030 is **4,092** as shown in above. This is the figure used to calculate the five year housing land supply position at the 2025 monitoring point (see Section 5 of this report). The average yearly deliverable dwellings in the next five years is 818.

Forecast/Projected East Devon district housing trajectory to 2031

4.5 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 the 2031/32 monitoring point.



Commented [MD14]: Looking at the data/graph would it help to add some text about (I presume it's the case) that no new local plan allocated sites are predicted to deliver completions (i.e. do not feature in the numbers) in the forward looking period. But to note that if they were to be built they would be in addition to those identified.

- 4.5 This trajectory is specific to the 2024-25 monitoring point and does not take into account the emerging local plan allocations. When developments are brought forward on allocations through the gaining of planning permission, dwellings within will then be projected. The local plan contains a local plan trajectory which, in addition to the data shown above, also displays the projected rate of completions on allocations.
- 4.6 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	393	312					696*
25/26			444	0	713	0	1157
26/27			367	25	309	102	803
27/28			244	100	237	111	692
28/29			155	290	128	116	689
29/30			115	480	40	116	751
30/31			92	445	230	116	883

*After MHCLG adjustments for care home beds have been made

Natural England – River Axe phosphate levels

- 4.7 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, 17 sites with outline / reserved matters planning permissions have been excluded from the forecast deliverable supply calculations. There is, however, potential for permissions to be granted if effective mitigation for nutrient neutrality is shown.

Commented [MD15]: Should this be "granted"? Do we have data on how many are 'held-up' by this constraint? Any merit in referencing the number?

4.8 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.

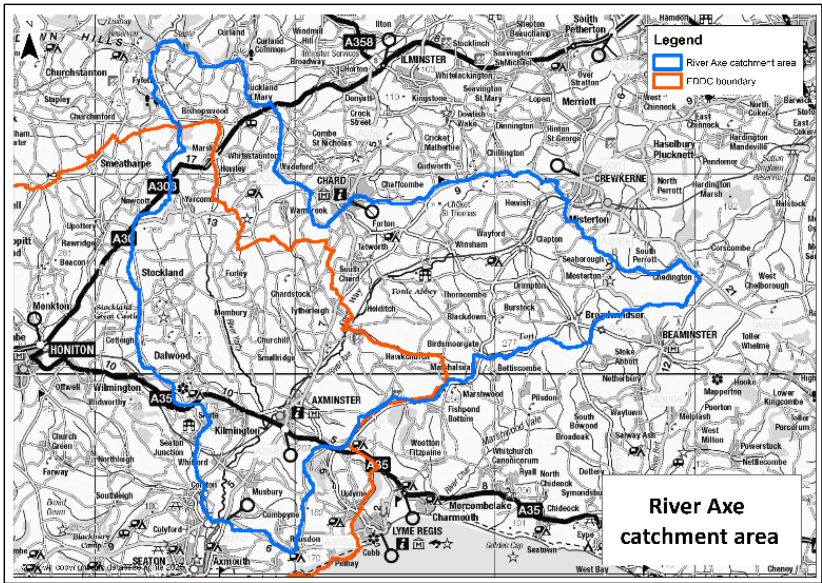


FIGURE 1: Map of River Axe catchment area

4.9 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 Maintaining supply and delivery

- Housing Delivery Test (HDT)**
- 5.1 In the latest National Planning Policy Framework (NPPF), published December 2024, Paragraph 79 states a buffer is required dependant on previous achievement of housing supply.
- 5.2 *“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 underdelivery 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 78 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.”*
- 5.5 This buffer is dependent on the results of the 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%. The calculations are as follows.

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

- 5.6 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

5.9 For more information on the calculations, the HDT Measurement Rule Book can be found at:

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

5.10 The results of the sixth HDT (covering 2020/21 to 2022/23) were released in December 2024. East Devon District Council passed the test with a score of 118%, meaning no 20% buffer is required when calculating the 5 year housing land supply figure, the calculations are shown below in table 1:

<https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

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

TABLE 1: Requirement and delivery 2020-2023

Number of homes Required			Total number of homes required
2020-21	2021-22	2022-23	
618	918	946	2,482
Number of homes delivered			Total number of homes delivered
2020-21	2021-22	2022-23	
904	1,039	996	2,940

TABLE 2: Housing Delivery Test calculation and results 2020-2023

Commented [JC16]: @Joseph Dunnett Wasn't the sixth set of HDT results published Dec 2024 rather than 2023?

Commented [JD17R16]: Yes definitely, it is the next 2 HDTs (2023-24 to be published in 2025 and 2024-25 to be published in 2026) that may be delayed.

Total number of homes required	Total number of homes delivered	Housing Delivery Test: 2023 measurement	Housing Delivery Test: 2023 consequence
2,482	2,940	118%	None

5.12 Previous results, including the sixth 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%
Sixth HDT (2020/21 to 2022/23)	118%

5.13 It should be noted that the 2024 and 2025 HDT are yet to be published but the following comment on the progress has been published:

“Stakeholders will be aware that we are currently operating to a delayed publication timetable for HDT as a result of planning reforms and associated consultations. We recognise that authorities, developers and others rightly expect the HDT to be published according to a regular timetable. We are therefore, considering options for expediting future HDT collections, including the possibility of combining the data collections for the 2024 and 2025 HDTs. We will update in due course.”

Buffer ensuring choice and competition

5.14 The NPPF sets out that to allow fair choice and competition or previous undersupply, buffers should be added. Paragraph 78 looks to:

5.15 *“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

a) 5% to ensure choice and competition in the market for land; or

b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement⁴² is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.”

Commented [JD18]: There is a need to add a 5% buffer to the 5 year requirement (not the yearly target)

- 5.16 The HDT shows there is no significant under delivery of housing so no 20% buffer is needed. However, to ensure choice and competition, a 5% buffer is required to be added to the annual target.
- 5.17 The resulting 5 year housing land supply position is used in 2 ways, for plan making and decision making. Paragraph 11 of the revised NPPF states:
- 5.18 *“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 strong 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*

6 District Five Year Housing Land Supply Position

- 6.1 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.
- 6.2 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).
- 6.3 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 1,156 dwellings per annum.
- 6.4 Working from the baseline figure of 1156 the following calculations outline the process to finding East Devons 5YHLS figure. This includes both the HDT result showing no need for a 20% buffer and the required 5% buffer to ensure choice and competition.

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

East Devon and sub-area housing requirement for 1st April 2025 to 31st March 2030					
	Calculation	Rest of East Devon	West End	EDDC Total	Supply sources
A		442	714	1,156	Local housing need
B	Ax5	2,210	3,570	5,780	Five year requirement target
C	A/20	22	36	58	5% buffer
D	B+C	2232	3606	5,838	Five year requirement target with 5% buffer
E	D/5	446	721	1,168	Annual Requirement

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

Supply sources at 31 March 2025 with realistic prospects of delivering dwellings 1st April 2025 to 31st March 2030					
	Calculation	Rest of East Devon	West End	EDDC Total	Supply sources
F		1,427	1,325	2,752	Extant permissions
G		0	895	895	Cranbrook Plan DPD expansion zones without Reserve Matters or Unconsented**
H		170	275	445	Future windfalls
I	F+G+H	1,597	2,495	4,092	Total five years deliverable supply
J	D-I	635	1,111	1,746	Five year shortfall figure
		SHORTFALL	SHORTFALL	SHORTFALL	Shortfall or Supply
Five year housing land supply position at 31st April 2025, the 2025 monitoring point					
K	H/C	3.58	3.46	3.50	Years of land supply

* 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

Five year housing land supply position – EDDC Total

6.5 At the 31st of March 2025, East Devon District Council can demonstrate a **3.50** year housing land supply position against the annual requirement of **1,168**. The total number of dwellings deemed deliverable in the five year period being 4,092 dwellings. Comparing the 4,092 forecasted five year supply (including dwelling equivalents from care homes) to the 5,838 net dwellings five year requirement indicates a district supply **shortfall of 1,746** dwellings.

6.6 Therefore, EDDC cannot demonstrate a five year housing land supply of deliverable sites as of the 31st of March 2025.

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

6.7 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 1,168 annual requirement shown 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 1,168 in the table above are therefore:
 - West End 61.77% (i.e. 721 p.a.)
 - Rest of East Devon 38.23% (i.e. 447 p.a.)

6.8 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 3.46 years supply
- Rest of East Devon 3.58 years supply

6.9 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. However, action to rectify the sub area position has occurred, namely:

- The Cranbrook Plan DPD was adopted.
- In three of the four Expansion Areas, there are recent planning applications where Planning Committee resolved to grant planning approval, subject to S106 agreements.
- Master planning is underway for the creation of Marcombe, a new town situated in the West End.
- Work is ongoing on the new Local Plan which is currently nearing 2nd Reg 19 stage which allocates a range of sites for housing and mixed use development across all of East Devon.

6.10 Details on the five year housing land supply figure calculation can be found online at:

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

6.11 The results and conclusions in this document supersede all previous East Devon Housing Monitoring Updates reports regarding the five year housing land supply position.

7 Delivery compared to adopted plan trajectory

- 7.1 The table below compares the 2025 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 19: Comparison of Local Plan and projected trajectories

Period	2025 monitoring point total annual completions and 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 2025 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	705*	1,012	-307	-3,862
25/26	1157	830	327	-3,535
26/27	803	691	112	-3,423
27/28	692	566	126	-3,297
28/29	689	551	138	-3,159
29/30	751	551	200	-2,959
30/31	883	565	318	-2,641
TOTAL	11,445	18,318		

*Assumes MHCLG adjustments for care home beds have been made

Commented [JC19]: [@Joseph Dunnet](#) The wrong MP is highlighted in white

- 7.2 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.
- 7.3 In producing the trajectory for the 2025 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.

APPENDIX 1 - Local housing need calculation

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 2025 monitoring point. The calculations are as follows:

TABLE 20: Average annual increase in households

EAST DEVON ONS HOUSEHOLD PROJECTIONS		
A	Projected households 2025	71,420
B	Projected households 2035	80,724
C	Projected increase in households 2025-2035 (B-A)	9,304
D	Annual projected increase in households 2025-2035 (C/10)	930.40

TABLE 21: 2025 affordability ratio

EAST DEVON ONS AFFORDABILITY RATIO		
	House price to workplace-based earnings ratio (published March 2025)	
E	East Devon median house prices five year average up to 2024	316,800
F	East Devon median workplace earnings five year average up to 2024	32,330
G	East Devon affordability ratio five year average up to 2024 (E/F)	9.86

TABLE 22: 2025 Monitoring Point East Devon Local Housing Need

EAST DEVON LOCAL HOUSING NEED		
H	Adjustment factor (PPG method. Calculations detailed below)	1.9234
I	Annual projected increase in households 2025-2035 (<i>D</i>)	930.4
J	Local Housing Need (annual) (<i>I</i> * <i>H</i>)	1156

TABLE 23: Adjustment Factor Calculations

Calculation of Adjustment Factor (based on PPG standard method)	
East Devon adjustment factor is calculated as follows: (((9.86 – 5) / 5) * 0.95) +1)	
9.86 – 5 =	4.86
4.86 ÷ 5 =	0.972
0.972 x 0.95 =	0.9234
Adjustment factor for East Devon. 0.9234 + 1 =	1.9234