

Proof of Evidence – Appropriate Location – Dr Gillian Baker

LAND OFF SPRUCE CLOSE, EXETER

PINS ref. APP/Y1110/W/22/3292721

Exeter Greenspace Group (Rule 6 Party)

June 2022

1. Executive Summary

- 1.1. The appellant has provided a convincing argument “on paper” that the proposed development is sustainably located. They have provided connectivity diagrams and information to suggest that the site is a natural extension of an urban development with good infrastructure. However, their connectivity map suggests that everyone walks at the “maximal rate” of 1.6 m/sec” and that the site is not challenged by physical topography and served by an effective public transport network.
- 1.2. This proof of evidence sets out our case that the proposed site is not an appropriate location for housing development because a) it is unsustainable, both environmentally and socially and b) it conflicts with the spatial strategy set out in the LPA’s development plan policies.
- 1.3. To substantiate our case, we have gathered a wide range of evidence: This includes door-to-door surveys of 86 households (representing 212 residents) about bus use and active travel; online social media surveys of bus use across beacon heath; thematic analysis of public comments in objection to the development from ECC’s portal; measurement of journey times on [plotaroute](#), and in-person using wearable devices. Data collation and methods are detailed in the Methods Statement provided in CD-GB8.
- 1.4. This evidence proves that
 - 1.4.1. The area is poorly served by local amenities and that the few that do serve the local area are not within “walking distance”, contrary to the appellant’s claims.
 - 1.4.2. The site’s location at the top of a hill with a gradient of 6.4% from the main roads precludes active travel for accessing amenities and would therefore increase car use. 90% of current residents surveyed rely on a car to get around. The physical effort to cycle to the development or walk with shopping/children/wheelchairs is prohibitive for all but the fittest members of society.

- 1.4.3. Local public transport is not fit for purpose. Only 35% of residents in the roads around the proposed site currently use the bus and those that do say that it is expensive and irregular and cannot be relied upon for connection to other public transport, appointments or work.
- 1.5. This proof also provides evidence that the proposed scheme conflicts with the spatial approach set out in ECC's development plan policies and is contrary to policy H1 of the Exeter Local Plan First Review (ELPFR), which stipulates that greenfield sites should be considered only where previously-developed alternatives are unavailable.¹
- 1.6. It concludes that the proposed site is not accessible or sustainable and does not meet the social and environmental sustainability objectives outlined in the NPFF² and would increase, not reduce, greenhouse gas emissions, contrary to NPFF 154 (b) and Policy CP1 of the Exeter Core Strategy (ECS).³ It is our view that significant weight should be given to these conflicts in the overall planning balance, especially in light of ECC's strong housing delivery record, "modest" housing shortfall, and the availability of more sustainably located, previously-developed sites in the city.

2. Introduction to Witness

- 2.1. My name is Dr Gillian Baker. I have a PhD in Ecology. I have published over 20 papers and had my research cited over 2000 times. I was the principal investigator of the Exeter 10000 study, a project that collected diet, lifestyle, activity and medical data from over 10000 local citizens and is the largest medical research cohort in the South West.
- 2.2. I am the convenor of Exeter Greenspace Group, a grassroots community group empowering local people to become involved in greenspace management and facilitating citizens to be actively involved in planning processes affecting local greenspace.
- 2.3. I am presenting evidence in a lay capacity as a resident of Beacon Heath and a member of the Rule 6 party. The methods that I have used to collate and analyse data however have been informed by my > 20 years' experience in research.

¹ Exeter Local Plan First Review (2005) (CD-DP5)

² NPFF, 8 (b-c) (CD-NPP1)

³ Exeter Core Strategy (2012) (CD-DP4)

3. Relevant Documentation

3.1. This proof should be read in conjunction with the following documents:

3.1.1. EGG Statement of Case [CD-ID7]

3.1.2. Statement of Common Ground between EGG and the appellant (still in draft at the time of writing) [CD-ID12]

3.1.3. The following Proofs of Evidence

3.1.3.1. On Public Open Space [CD-SH1]

3.1.3.2. On landscape impact [CD-MB2]

3.1.3.3. Planning balance (summary) [CD-ID12]

3.2. This proof is supported by the following appendices:

3.2.1. Methods Statement by the Rule 6 Party [Appendix CD GB8]

3.2.2. Pseudo-anonymised raw data from house-to-house surveys [Appendix CD GB9].

Identifiable data will be made available directly to the inspector for verification but will not be made publicly available to comply with GPDR.

3.2.3. Raw data from bus-user surveys [Appendix CD GB10]

3.2.4. Thematic analysis of online objections: Sustainability & Infrastructure [Appendix CD GB11]

4. Background and Relevant Policies

4.1. The relevant 'development plan' for the purposes of s38(6) of the 2004 Act in relation to the appeal proposal is as follows:

4.1.1. Exeter Core Strategy 2026 (Adopted February 2012) (ECS)

4.1.2. Exeter Local Plan First Review (Adopted March 2005) (ELPFR); and

4.1.3. The Core Strategy DPD

4.2. Other documents that are material considerations are as follows:

4.2.1. Appeal Decision of Land at Pennsylvania Road, Exeter (PINS ref: APP/Y1110/W/20/3265253)

4.2.2. National Planning Policy Framework⁴

5. Assessment of local amenities and facilities claims

⁴ Relevant sections are agreed in our SoCG with the Appellant (in draft and unsigned at time of writing)

5.1. The appellant states that the site is in a sustainable location and served by a “host of services/facilities.”⁵ It is our case, however, that this claim is not accurate or up-to-date and that, on the contrary, the site is poorly served by local amenities.

5.2. As a local resident group, we have been able to collate information regarding the accessibility of the proposed site and local facilities that are more accurate and up to date than the information provided in the appellant’s Design and Access Statement. This evidence challenges the appellant’s argument that the site is in a sustainable location in relation to accessibility to employment, shops, education establishments and other social and community facilities.

5.3. Table 5.3.1 sets out our evidence that the appellant’s information is out-of-date and misleading in terms of social and environmental sustainability.

Table 5.3.1: Comments on the accuracy of amenity claims in Appellant Design & Access Statement

Appellant’s Design & Access Statement	Rule Six Party Summary Evidence
A host of existing facilities/services can be found south of the Local Centre, including a leisure centre, Co-op, Pharmacy, Hairdresser and fish and chip shop (approximately 1km away). A local Pub is located on Lancelot Road. Extensive sport facilities are located further south as part of Exeter Arena Athletics Stadium	There is no longer a Co-op. There is a Spar convenience shop, but this serves more as an off-licence and confectioner than a location from which to buy balanced family meals. The nearest supermarket is 1700 m from the bottom of the proposed site and involves a climb of 65 m. The pharmacy no longer exists. The leisure centre described is a 19m swimming pool.
Spring Nurseries Exeter located only 8-minute walk. Willowbrook School (Primary School) is a 10-minute walk from the south-eastern boundary. Beacon Heath local centre is an 8-minute walk to the south of the Site	The walk from the primary and secondary schools to the proposed development are 18 and 14 minutes respectively when calculated using usual walking speeds of 1.31m/s.

⁵ Appellant Design & Access Statement, 2.2.1 (CD-PA4)

<p>Bus services operate within close proximity of the Site on Savoy Hill and Chancellor's Way with the nearest bus stop (serving bus service F1 and E) located approximately 3 minutes' walk via Celia Crescent.</p> <p>Along Beacon Lane there is a number of services running to centre of Exeter and surrounding neighbourhoods. From the Beacon Lane bus stop it takes approximately 24 minutes to get to Exeter City Centre and 6 minutes to the nearest train station in Pinhoe (services to Exeter St. David's and London).</p>	<p>The appellant's description of the bus service is out of date. There is now an L bus travelling along Beacon Lane and an F bus on Savoy Hill and Chancellor's Way. There is no information in the Design and Access Statement about the frequency or reliability of the bus service. The walk from the nearest station on the mainline (Pinhoe) is over 2600 m away.</p>
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5.4 Further, we disagree with the appellant's estimated walking times outlined in their Statement of Common Ground with Devon County Council. We provide alternative, more accurate, data in Table 5.5.1. The data shows that estimated journey times are 60% higher than those presented by the appellant.

The difference in data is due to two factors:

- 5.4.1 The appellant only mapped the downhill journey from the proposed development to amenities rather than the return journey which would be the one that determined "walkability"
- 5.4.2 The appellant chose a walking speed algorithm that reflected maximal walking speeds and not usual walking speeds.

5.5 We have recalculated journey times based on a walking speed of 1.31m/sec.⁶ We have also calculated ascents and gradients which are integral to assessing the feasibility of accessing amenities on foot.

⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7806575/> (CD-GB1)

Table 5.5.1: Review of distance and walking time to local facilities

Facility	Appellant distance (m)	Appellant time (min)	EGG distance (m)	EGG time (min)	Ascent (m)	Average gradient	Appellant time underestimation
St James School	650	7	802	14	44	5.5	-7 ⁷
Northbrook swimming pool	760	9	816	15	43	5.3	-6 ⁸
Willowbrook school	800	9	1010	18	53	5.2	-9 ⁹
Spar	1000	12	1092	18	52	4.8	-6 ¹⁰
GP Practice	1500	18	1642	27	66	4.0	-9 ¹¹
Morrison's	1600	19	1747	28	65	3.7	-9 ¹²
Polsloe Bridge	1900	22	2003	32	77	3.8	-10 ¹³
Main Road/ Community centre			700	13	45	6.4	n/a ¹⁴

6. Assessment of active travel and sustainable transport claims

⁷ <https://www.plotaroute.com/route/1932020>

⁸ <https://www.plotaroute.com/route/1932010>

⁹ <https://www.plotaroute.com/route/1932022>

¹⁰ <https://www.plotaroute.com/route/1932002>

¹¹ <https://www.plotaroute.com/route/1932028>

¹² <https://www.plotaroute.com/route/1931993>

¹³ <https://www.plotaroute.com/route/1931999>

¹⁴ <https://www.plotaroute.com/route/1932014>

6.1. The appellant states in their Design & Access Statement that the scheme would provide “buildings in a sustainable location that will minimise the need to travel owing to proximity to community services and facilities and sustainable transport nodes.”¹⁵ However, it is our case that the scarcity and distance of local amenities coupled with the hill-top topography of the site would increase car use, contrary to NPFF and ECS policies.¹⁶

6.2. Table 6.2.1 set out our evidence evaluating the appellant’s sustainability transport claims.

Table 6.2.1: Comments on the accuracy of travel/transport claims in Design & Access Statement

Appellant’s Design & Access Statement	Rule Six Party Summary Evidence
<p>Pedestrians can traverse the site and access other facilities at an average speed of 100m/min. (See Fig 6 of D&AS).</p> <p>No mention of gradient is mentioned in the appellant’s statement. The connectivity diagram describes a location easily accessible by foot, cycle & public transport.</p>	<p>Published evidence suggests that the normal healthy adult walking speed is 67m/min (1.31m/sec). Thus, estimations of connectivity and ease of access to facilities have been over-inflated by the appellant. This is a considerable inflation and assumes a flat terrain.</p> <p>In fact, the gradient of road from the main road to the estate is 6.4% (see Table 5.5.1). This gradient is categorised as “challenging” and only suitable for someone in “good hiking condition”.¹⁷</p> <p>Research has shown that a 1% increase in gradient equates to a walk being 10% less attractive.¹⁸</p> <p>The walk up to the development is thus 64% less attractive than a linear walk and thus off-putting for most people, especially those with mobility issues. This is borne out in our questionnaire data (see</p>

¹⁵ Appellant Design & Access Statement, 1.7.8 (CD-PA4)

¹⁶ NPFF 154 (b) (CD-NPP1), ECS Policy CP1 (CD-DP4)

¹⁷ <http://www.nwhiker.com/HikeEval.html> (CD-GB3)

¹⁸ <https://www.sciencedirect.com/science/article/pii/S2352146517309924> (CD-GB4)

	<p>Appendix CD GB9) where 75 out of 86 households living in the roads around the proposed development felt they could not use active travel (bike, walk) due the steepness, distance, time and effort needed to travel back up to the estate.</p> <p>Our evidence also shows that carrying half a week's shopping from the supermarket to the proposed site requires 93% of the maximal heart rate for a fit healthy adult and is thus not a realistic expectation (see Figure 6.4.1).</p>
<p>Pedestrian 2.2.5 Surfaced and lit pedestrian footways are typically present on both sides of Pinwood Meadow Drive and Celia Crescent, both of which lead to the Site. Pedestrians can use this route to access public transport, local centre services and the City Centre. Spring Nurseries Exeter located only 8-minute walk. Willowbrook School (Primary School) is a 10-minute walk from the south-eastern boundary. Beacon Heath local centre is an 8-minute walk to the south of the Site</p>	<p>There are surfaced and lit paths however the gradient is very steep. In surveys of 86 households living in streets surrounding the proposed site > 91% use a car for trips to the shops and doctors. The majority of residents felt that they would not be able to give up their cars due the steepness of roads, poor public transport and distances to local facilities (see Appendix CD GB9).</p>
<p>Cycle 2.2.6 A range of local facilities are within a 6-minute cycle of the Site. A formal cycle network is accessed from the south of the Site linking the wider area. Traffic-free routes are available along Summer Lane leading to schools, supported with signalled crossing.</p>	<p>Again, the considerable gradient of the roads to the proposed development have not been mentioned. Local facilities are within 6 minutes downhill cycle, however according to surveys of 86 households the majority would not consider cycling due to the steepness of the roads (see Appendix CD GB9 questionnaire data). Only 4 households used a bicycle to access their doctor and only 1 to access shops.</p>

	<p>Thematic analysis of resident objections to the proposed development (see Appendix CD GB11) also suggest that cycling is not a realistic travel option for this site e.g.</p> <p>“I am a keen cyclist and found it a challenge to cycle to this site so the anticipation that people will cycle/walk to their destinations from the proposed site is in my opinion hopeful rather than realistic.”</p>
<p>Bus 2.2.7 Bus services operate within close proximity of the Site on Savoy Hill and Chancellor’s Way with the nearest bus stop (serving bus service F1 and E) located approximately 3 minutes’ walk via Celia Crescent.</p> <p>2.2.8 Along Beacon Lane there is a number of services running to centre of Exeter and surrounding neighbourhoods. From the Beacon Lane bus stop it takes approximately 24 minutes to get to Exeter City Centre and 6 minutes to the nearest train station in Pinhoe (services to Exeter St. David’s and London).</p>	<p>In an online survey of 103 Beacon Heath residents (see Appendix CD GB10 bus survey), 27% said they never used the buses. 96% of these respondents did not use them due to their unreliability. Of the 73% of responders who did use the buses 88% described the service as “poor”. Free text optional responses included e.g. “Although I have a bus pass, and therefore do not pay, the service has become so unreliable that I no longer use the buses very much.”</p> <p>In the survey of residences (Appendix CD GB9 questionnaire) closest to the proposed development only 35% of the 86 households used the bus (unreliability, poor service and cost being the major factors for not using the bus). When questioned many residents expressed the view that the proposed extension of the bus service further into the estate as part of the development would be more of a detriment (in terms of road safety and congestion) than a benefit (as a reliable source of public transport). S106 payments of £80K are proposed to extend bus infrastructure to the site, but this will not address persistent reliability and affordability issues nor improve the network of destinations available.</p>

	<p>Respondents said that they would not rely on the bus service to get connecting trains or to meet specific appointments. The walk from the nearest station on the mainline is over 2.6km away.</p>
<p>Environmental 1.7.8 Moreover, through providing energy efficient buildings in a sustainable location that will minimise the need to travel owing to proximity to community services and facilities and sustainable transport nodes, and that avoids areas of flood risk, the proposals will contribute to mitigating climate change. The enhancement of sustainable transport connections will also contribute positively to reducing the need for car travel, and therefore to reducing CO2 emissions and improving air quality.</p>	<p>According to our surveys (Appendix CD GB9) >90% of households in the roads either side of the proposed site are dependent on private car use due to the gradient of the roads which make them unsuitable for active travel. The addition of >150 parking spaces in the new estate and a further 4 at Spruce Close will increase the number of cars in the estate and using the Beacon Lane. An extended bus service is unlikely to have an impact on car use as the core issues with the city's bus service cannot be solved with a one-off £80k S106 payment.</p> <p>The increase in traffic in this part of the city will not contribute positively to addressing climate change, will not reduce CO2 emissions and will not improve air quality.</p> <p>We cannot find any specific mention in the design and access statement of any specific standards for "energy efficiency", such as passivhaus. If the housing design is not planned to the highest energy efficiency standards we would argue that the development is unlikely to contribute to the mitigation of climate change.</p>

6.3. Government guidance in the Manual for Streets notes that walkable neighbourhoods have a range of amenities within 800m walking distance.¹⁹ It also sets out that pedestrian and

¹⁹ Manual for Streets (2007), para 4.4.1 (CD-SPD19)

cycle routes should ideally have a gradient of no more than 5%.²⁰ All but one amenity listed in Table 5.5.1 are over 800m away from the proposed site and the journey from the development to the main road involves a gradient of 6.4%. It is our view that the development does not meet the criteria for a walkable neighbourhood.

6.4. It is clear from the data that accessing local amenities by foot or bicycle would be difficult for all but the very fittest residents. To determine the physical effort required to return home on foot from the local Morrison's supermarket, a local resident carried half a week's shopping for two adults from the road adjacent to the supermarket to the proposed site access at Celia garages. The graph shown in Figure 6.4.2 shows the elevation of the walk and heart rate required to undertake this exercise. The activity scored 93% of maximum heart rate. Vigorous activity is defined as activity that results in a heart rate of 77- 93%.²¹ This single shopping trip carrying half a week's groceries required vigorous activity levels for fit middle-aged person. This is equivalent effort to a sprinter on the home straight. This level of physical effort would not be possible for an older or less fit person.

Figure 6.4.1 Data of shopping trip from St Katharine's Road (100m from Morrison's Supermarket) to the proposed development off Celia Crescent.

<i>Total distance (meters)</i>	1500	<i>Average heart rate (bpm)</i>	133
<i>Total time (minutes)</i>	19:40	<i>% of Max HR based on age</i>	79%
<i>Average pace (min/km)</i>	13:08	<i>Max heart rate (bpm)</i>	157
<i>Average speed (km/hr)</i>	4.6	<i>% of Max HR based on age</i>	93%
<i>Total Ascent</i>	67m		

²⁰ As above, para 6.3.27 (CD-SPD19)

²¹ <https://www.cdc.gov/physicalactivity/basics/measuring/hearttrate.htm> (CD-GB12)

Figure 6.4.2 Graph of heart rate and elevation during a grocery shop from St Katharine’s Road (100m from Morrison’s Supermarket) to the proposed development off Celia Crescent.



6.5. As set out Table 6.2.1, survey responses confirm that the topography of the site prevent residents from using active travel (walking or cycling) to access local amenities. I would also refer the Inspector to the conclusion of the Inspector of the Land at Pennsylvania Road appeal – a similar hill-top site – that the site location was not accessible because “the appeal site is located on a hill and therefore to access services and facilities on foot would involve walking down and up a relatively steep incline. This would not be practical if carrying shopping or pushing a buggy for any distance. I do not therefore consider the location to be accessible.”²²

6.6. Secondly, while two bus services do serve the site, services are infrequent, expensive and unreliable. As shown in Table 6.2.1, 92% of residents surveyed said they did not use the bus due to their unreliability. In April 2022, the Exeter Highways and Traffic Orders Committee (HATOC)

²² Land at Pennsylvania Road, Exeter (PINS ref: APP/Y1110/W/20/3265253), para 101. (CD-A14)

called an emergency meeting with the Managing Director of Stagecoach Southwest to discuss failing bus services in Exeter. HATOC concluded that services are “not fit for purpose”.²³

6.7. While the appellant proposes to extend the F bus route to the development, this will in no way address endemic issues with the bus service, increase route availability or address the issue of unaffordable fares, all of which prevent current residents from using the bus as an alternative to their cars. We do not share the appellant’s view that their one-off S106 payment to provide additional bus stops constitutes a betterment of sustainable transport modes. Rather, it is simply a mitigation and will not decrease car dependency in real terms.

6.8. Considering all the evidence, it is our conclusion that residents of the proposed development would be obliged to use cars to access local amenities and the wider city. This will increase, not decrease, carbon emissions, thereby conflicting with NPPF 154 (b) which says that new development should be planned in such a way that helps to reduce greenhouse gas emissions. It is our view that this policy conflict should be given considerable weight, especially at a time when the LPA has alternative, more sustainably located, sites currently under active consideration.²⁴

7. Conflict with ECC’s Spatial Strategy and Policy

7.1. Both the ELPFR and the ECS set out the need to prioritise sustainable development sites to ensure that Exeter grows within its environmental limits. This is to be achieved through delivering a spatial strategy set out by Policy CP1 that focuses on the city centre, existing centres and previously developed land while providing for additional developments in sustainable urban extensions to the east and southwest of Exeter and extending the development of the east Exeter beyond the city’s administrative boundary. This spatial strategy is underpinned by an unequivocal imperative to steer development away from the hills to the north and northwest that are “strategically important to the landscape of the

²³ <https://www.devon.gov.uk/news/council-committee-concludes-that-radical-change-is-needed-to-improve-bus-services-in-exeter/> (CD-GB5)

²⁴ See for example Land at St Bridget Nursery, Old Rydon Lane, Exeter (ECC Ref: 22/0537/OUT) (CD-GB6)

city.”²⁵The proposal site is designated as landscape setting in the ELFR and ECS and sits on those very hills that are marked out for protection.²⁶

7.2. In the same spirit, ELPFR Policy H1 sets out a spatial hierarchy for assessing planning proposals. “Greenfield developments through sustainable urban extensions within public transport corridors” are at the bottom of that hierarchy and are to be considered only where there are no previously developed alternatives. Contrary to the appellant’s claim that it is no longer reflected in national policy, Policy H1 was found to be in date by the Inspector of the Land at Pennsylvania Road appeal.²⁷

7.3. The appellant argues that this development would not conflict with H1 on the basis that there is an absence of previously developed alternatives. There is also an assumption running through their application and appeal materials that ongoing spatial constraints within the city require the LPA to consent to greenfield development to meet its housing requirements.²⁸ They go as far as to cite decisions made in 2012 to allocate limited landscape setting land for strategic urban extensions as evidence of this. It is our view that the context has evolved markedly over the last decade and there is compelling evidence that there are sufficient brownfield sites within the city to maintain our housing land supply.

7.4. The LPA is currently preparing its new Local Plan which will be underpinned by a bold vision for sustainable brownfield development and urban regeneration. Exeter City Council’s Liveable Exeter programme, while nascent, has clearly identified a host of previously developed sites that will support the development of 12,000 homes by 2040. Not only are these sites brownfield, but they are well-connected to local amenities would allow for car-free developments, in stark contrast to the appeal proposal. While the Plan has not yet been adopted, it is incorrect, given the advanced work that has been done to scope sites, to claim that greenfield development is the only way for the LPA to meet its housing requirement. Further, as mentioned above, there are applications already in the planning

²⁵ Exeter Core Strategy para 4.11 (CD-DP4)

²⁶ See EGG Proof of Evidence – Landscape for our treatment of landscape impact and Policy CP16 (CD-MB1)

²⁷ Appellant statement of case para 3.32 (CD-ID2). Land at Pennsylvania Road (PINS ref: APP/y1110/W/20/3265253), para 21 (CD-A14)

²⁸ Appellant statement of case, paras 3.3, 3.6, 3.33, 3.34, 3.41. We deal with previous appeal decisions in Proof of Evidence – Landscape Impact (CD-ID2)

system that are on brownfield sites and sustainably located. Therefore, it is our view that this proposal does indeed conflict with Policy H1.

8. Conclusion

- 8.1. The appellant argues that “significant weight” should be given to available and appropriate opportunities to accommodate growth in Exeter.
- 8.2. My evidence shows that the proposal site is not an accessible, appropriate or sustainable location for housing development. It is located on top of a hill and underserved by amenities and public transport. It would increase car dependency at a time of climate crisis and the housing design is not stated to meet specific energy efficiency targets (e.g. Passivhaus design). We do not therefore believe that it meets the NPPF’s social and environmental sustainability objectives.
- 8.3. I have also shown how the proposal site conflicts with ECC’s spatial strategy and Policy H1. In the context of an only “modest” housing shortfall and when the LPA scored 155% on the 2021 Housing Delivery Test, I believe this policy conflict be given significant weight.²⁹
- 8.4. Given the evidence of alternative, more sustainable and better-connected sites to meet Exeter’s housing supply, I strongly disagree with the appellant’s view that the proposal scheme offers an “appropriate” opportunity to accommodate growth and do not believe that this factor should be given significant weight in the planning balance.

²⁹ Land at Pennsylvania Road (PINS ref: APP/y1110/W/20/3265253) para 96 (CD-A14). 2021 Housing Delivery Test - <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement> (CD-SPD11)