



Local Plan Review  
Forward Planning  
Mid Devon District Council  
Phoenix House  
Phoenix Lane  
Tiverton  
Devon  
EX16 6PP

SENT BY E-MAIL AND POST

14<sup>th</sup> February 2017

Dear Sir / Madam

## **MID DEVON LOCAL PLAN REVIEW PROPOSED MODIFICATIONS CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations and in due course attend the Examination Hearing Sessions to discuss these matters in greater detail.

### **Modifications 7, 8 and 17**

The HBF acknowledges the increase in the proposed housing requirement to 7,860 dwellings (393 dwellings per annum) for the plan period of 2013 – 33 compared to the previously proposed housing requirement of only 7,200 dwellings.

This newly proposed housing requirement figure is based on the Exeter HMA SHMA Final Report by DCA published in 2015 which identifies an objectively assessed housing need (OAHN) range of 378 – 400 dwellings per annum with a mid-point figure of 389 dwellings per annum for Mid Devon. Whilst the proposed housing requirement figure is marginally higher than the identified mid-point figure it remains below the upper end of the identified OAHN range. Therefore this proposed housing requirement may still not support the

additional jobs created from the economic growth planned at Junction 27 of the M5. Moreover there are no other upward adjustments for worsening market signals as set out in the NPPG (ID : 2a-019) or to assist in the delivery of affordable housing needs as set out in the NPPG (ID : 2a-029). It is also noted that the Exeter SHMA pre-dates the publication of the 2014 Sub National Household Projections (SNHP) and by the time of the Local Plan Review Examination the Council's evidence will be somewhat dated. It is suggested that before the Local Plan Review is submitted for examination an update of the Exeter SHMA is undertaken to confirm that no meaningful changes to OAHN have arisen as set out in the NPPG (ID : 2a-016). The HBF may submit further comments on OAHN and the Council's proposed housing requirement when further evidence is available.

The proposed modifications also update the Council's overall housing land supply (HLS) and housing trajectory. It is noted that the HLS includes a 10% contingency to provide flexibility for unforeseen circumstances and in acknowledgement that not all commitments translate into completions. The Council should provide further robust evidence that the proposed 10% contingency plus its reserve sites provide an appropriate amount of flexibility for Mid Devon.

Using the Sedgefield approach to recouping previous shortfalls and a 20% buffer applied to both the shortfall and annualised requirement the Council only just has a 5 YHLS. The HBF agrees that the Council's use of the Sedgefield approach and 20% buffer are appropriate. Whilst the HBF does not comment on the merits or otherwise of individual sites in the Council's HLS and housing trajectory other parties may be able to demonstrate that the Council's evidence is not robust. If during the Examination the Council was unable to demonstrate a 5 YHLS on adoption of the Local Plan Review then the Plan would be unsound. Therefore lead-in times, lapse rates and delivery rates set out in the Council's 5 YHLS calculation and housing trajectory should be realistic as evidenced by support from housebuilders with interests in identified sites and sense checked by the Council using historic empirical data. As always the HBF would advocate the widest possible range of sites in the HLS and trajectory to maximise delivery.

It is also noted that Modification 17 proposes that Gypsy & Travellers pitches are provided on large housing sites for example at Tiverton Eastern Urban Extension, North West Cullompton, East Cullompton and Pedlerspool in Crediton. This proposal should be incorporated into the Council's whole plan viability testing to assess its impacts on net developable areas, land values and house prices. This proposal should also be agreed with the respective landowners / developers of these large housing sites.

### **Modifications 18 and 198**

The HBF welcomes recognition of self build and custom build under the same definition. However our objections remain to Bullet Point (d) of **Policy S3 Meeting Housing Needs** which has not been subject to any modifications.

## **Modifications 150 and 151**

The HBF is supportive of the simplification to the wording and format of **Policy DM12 – Design of Housing** and the deletion of **Policy DM13**. However the HBF objections to the introduction of the nationally described space standards and higher optional Part M4(2) accessible / adaptable home standards remain. As previously stated by the HBF the Council should fully justify the inclusion of these optional standards in its Local Plan policy.

## **Conclusion**

We trust that these representations are helpful in informing the next stages of the Mid Devon Local Plan Review. In the meantime if you require any further information or assistance please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**