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1581/2377/Dm12



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Local Plan Review Consultation  
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Date: 27 April 2015  
Our Ref: CB M5/0105-21  
Your Ref:

By email only:  
[localplanreview@middevon.gov.uk](mailto:localplanreview@middevon.gov.uk)

Dear Sir or Madam

**RE: PROPOSED SUBMISSION CONSULTATION OF THE LOCAL PLAN REVIEW**

We represent the **South West HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

**Policy S3: Meeting Housing Needs (Affordable Housing)**

We support the policy thresholds set out in this policy as being PPG-compliant.

It is evident that affordable housing need is significant within Mid Devon with a substantial accrued backlog demanding urgent attention.

Appendix III Table 1.4 of the 2014 SHMA sets out a backlog of 535 affordable homes in Mid Devon with an overall annual total set out in table 1.10 of 279 new affordable homes. The Council have set out a lower affordable housing figure, justified by paragraph 11.1.3 of the SHMA which states that:

*"...only new forming households should be taken into account in the calculation as the backlog and existing households already live in housing units which would be freed up when they are housed and do not create any net need in terms of the total future requirement."*

The PAS guidance quoted above is not applicable here as affordable housing need is calculated differently to total need, as acknowledged by the PAS guidance which states that "affordable need should not be treated as a component of the OAN but as an adjustment to the main OAN calculation" (paragraph 2.12). In practice 42.8% of homes in Mid Devon do not meet the decent homes standard (SHMA 2014 Table 5.2). If a family need to move from a two bed to a three bed property then a new home will be freed up; if however the house is unsuitable for habitation, or a household is forced into the private rented sector and are waiting to move into affordable accommodation then the dwelling left behind is unsuitable and should not be included.

The Housing Needs SPD (2012) noted the evidence of a Housing Needs Assessment undertaken by David Couttie Associates in 2011:

*"This used the Government's method for calculating need which identified that to meet the existing backlog of need in Mid Devon, 643 affordable dwellings are required per annum. Some of this need can be met by re-letting the existing social stock which currently averages 234 units per annum. After allowing for this level of re-let supply, and an estimated 16 shared ownership re-sales annually, there will still be a total annual affordable housing shortfall of 393 units if dealing with the backlog over 5 years or 335 units over 10 years."* [Our emphasis]

Table 1.4 sets out an average affordable need of 124 homes per year; with a target of 360 dwellings per annum that is an affordable housing target of 34%. This assumes that every site is above the

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threshold to deliver affordable homes and that all sites deliver at 34%. Policy S3 sets out a target of 28% in Tiverton, Cullompton and Crediton and 30% across the rest of the district. This would not be sufficient to reach the affordable housing target.

The above calculation is made worse when the affordable housing target is set at 279 dwellings per annum (as per Table 1.10 which also includes the backlog), is taken into consideration. This would require an affordable housing policy of 77.5% to reach the affordable housing target, using the overall housing target of 360. In such circumstance it would be appropriate to note the following statement in the PPG (Reference ID: 2a-029-20140306):

*“an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”*

We strongly urge the Council to reconsider its approach to meeting local affordable housing need by seeking to boost its overall housing target to aid delivery of affordable housing across the District.

### **Policy DM12: Design of Housing (Including Older Peoples Housing)**

Paragraph 2.29 acknowledges that the SHMA forecasts a significant increase in Mid Devon's older population; Figure 8.2 of the SHMA shows population growth in the 75+ age group will increase by over 80% alone. Despite this the Council consider that there is no specific need for a policy target related to housing for older people.

We do not think that Policy DM12 is suitable in addressing the needs of older peoples housing and an individual policy should be adopted. This would bring the Plan into greater conformity with the NPPF, which notes the need to deliver a wide choice of high quality homes, including for older people. The NPPF specifically notes *“the full range of retirement and specialised housing for those with support or care needs”* suitable for meeting the diverse range of needs of older people.

We also note that the Government announced in a written ministerial statement published on 25 March 2015 the new housing standards, including the introduction of new Building Regulations and the new National Technical Standards (national space standards). These rationalise the previous standards (including Code for Sustainable Homes), and provide local planning authorities with the option to set additional technical requirements for access and water. Policy DM12 should now be revised to either reflect the new National Technical Standards (with the required evidence), or to remove those points conflicting with the PPG, which states:

*“Where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard”* (Paragraph 018 Reference ID: 56-018-20150327)

*“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- **need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- **viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- **timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”* (Paragraph 020 Reference ID: 56-020-20150327)

Similarly, Mid Devon should be aware that in order to introduce the optional accessibility, adaptability and wheelchair housing standards that evidence is to be provided demonstrating clear need for housing for people with specific needs, and plan to meet this need. Mid Devon District Council are also required to provide evidence of local need in seeking to apply the new Building Regulations optional water requirement. Whilst the timing of this announcement and guidance change is unfortunate, we would be strongly supportive of Mid Devon seeking to introduce these new standards which come into effect on 1 October 2015.

The above comments are intended to be constructive and we welcome further opportunities to provide input. We would like to be informed of the progress of Local Plan Review; please ensure that the **South West HARP Planning Consortium** are retained on the LDF database, with **Tetlow King Planning** listed as their agents.

Yours faithfully

**CHRIS BURTON MPLAN**  
**ASSISTANT PLANNER**  
For and On Behalf Of  
TETLOW KING PLANNING

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