

Plan Mid Devon

From: Pickhaver, David [REDACTED]
Sent: 25 March 2022 15:34
To: Tristan Peat; Plan Mid Devon
Cc: [REDACTED]
Subject: Mid Devon 2023-43 Regulation 18 Issues Consultation.

Dear Tristan and Team

Thank you for your consultation on the Regulation 18 Issues paper on 'Plan Mid Devon'. I note that you have an online questionnaire, however as most of the points that Torbay would wish to raise are quite specific, it seemed more appropriate to make these via email.

The document is very well set out and clearly has involved a great deal of work since the adoption of the current Mid Devon Local Plan in 2020.

Given that Devon local authorities have declared a Climate Emergency, it makes good sense to make "responding to the climate emergency and moving to a net zero future" the first priority that sits over the remaining five priorities.

I note that Plan Mid Devon does take a longer term timeframe but still cites a Plan period of 2023-43. Whilst this is a matter for MDDC, paragraph 22 of the 2021 NPPF suggests a 30+ year trajectory where larger scale developments or significant extensions to existing villages and towns form part of the strategy. This may be appropriate given the scale of projects in Mid Devon, particularly Culm Garden Village.

The current consultation is an early stage consultation that raises issues, rather than makes proposals. Section 6 quite correctly looks at housing need evidence, including the Standard Method. There will inevitably be new demographic data available as Plan Mid Devon progresses. In particular the 2021 Census and 2020 based population and household projections (when published) are likely to make the government's reliance on the current 2014 based "standard method" increasingly untenable.

Paragraph 6.1 of the consultation document refers to the majority of new houses in Mid Devon providing homes for people in Mid Devon. However the Mid Devon Local Plan does need to reflect the interconnected nature of the housing and employment market in the Sub Region. In particular Mid Devon is part of the Greater Exeter Housing Market Area (HMA) and Functional Economic Market Area (FEMA). Overall population increase in the whole of the area (and indeed Devon and Cornwall) is driven by net domestic immigration, and this should be considered at an HMA level. The housing requirement for each area would more rationally be set according to factors such as areas' environmental capacity, proximity to employment and facilities and transport links, rather than a district level algorithm.

As you are aware, Torbay has indicated that it will struggle to meet its local housing need as identified by the current Standard Method due to its environmental constraints. Accordingly, as part of the ongoing Duty to Cooperate, we have been alerting nearby LPAs that we may need to ask neighbours to accommodate part of this need – which as I have noted is driven by inter-regional domestic migration. MDDC has quite rightly responded to Torbay's recent Regulation 18 Growth Options consultation to indicate that it (Torbay) needs to do all it can to meet its needs within its area. We are preparing additional assessment work based on the consultation responses and look forward to ongoing engagement with our neighbours, including MDDC. I confirm that Torbay will be seeking to meet as much of its needs within its area, particularly through significant urban regeneration opportunities in Torquay, Paignton and Brixham.

In the context of this, the 2021 Housing Delivery Test figures show Devon as a whole exceeding the housing requirement by over a fifth (with a score of 121%). The former GESP authorities plus Torbay

score 113%. On this basis it appears to me that a more rational distribution of housing need according to what is already being delivered would show that Devon's housing need is being met at a county level, despite some local shortfalls. Both Torbay and Mid Devon have pressing affordable housing needs, and I welcome that the issues paper engages with this issue

Greater Exeter	2021 HDT Score
East Devon	123%
Exeter	155%
Mid Devon	127%
Teignbridge	86%
Torbay	75%
Plymouth JLP	128%
North Devon and Torridge	142%
All Devon	121.00%

I hope that these comments are constructive, and we look forward to ongoing work with Mid Devon as part of our ongoing Duty to Cooperate.

Kind regards
David

TORBAY COUNCIL

David Pickhaver | Chartered Planner, Strategy and Project
Management | Spatial Planning
2nd Floor North, Tor Hill House, Torquay TQ2 5QW

www.torbay.gov.uk
[Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Instagram](#)

Following Government social distancing guidelines, I am currently working from home and can be contacted by email or by phone on the number above.
We want to support our communities during this current climate. Thank you for support and understanding.

This electronic email is confidential and may also be privileged. If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately. The views in this message are personal; they are not necessarily those of Torbay Council.