

Meeting Housing Needs Supplementary Planning Document Consultation Statement

**Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012
Regulation 12**

Public Consultation 2023

The Council carried out a public consultation on a new Meeting Housing Needs Supplementary Planning Document (SPD). The SPD has a number of purposes which aim to:

- Support relevant policies in the adopted Mid Devon Local Plan 2013 – 2033 in relation to housing and communities
- Engage with developers early in the planning process to include affordable and social rent properties in new development
- Set out a clear process for communities to lead on delivering new homes
- Encourage a wider range of approaches to delivery, including self-build and Modern Methods of Construction (MMC)
- Support design of low carbon, accessible and adaptable homes

The consultation took place from Monday 17 July to Friday 25 August 2023.

The Council wrote to all consultees on the Forward Planning Consultation database at the time of the consultation. These comprised:

- Mid Devon elected members
- Mid Devon parish/town councils

- Adjoining parishes, neighbouring local authorities and statutory groups (including specific and general consultation bodies)
- General consultation bodies and other consultees including database groups defined as individuals, businesses, landowners and voluntary organisations.

In addition, the following methods were used to notify consultees:

- Press releases
- Information on the Council’s website and ‘Let’s Talk Mid Devon’ website
- Social media updates
- Display of documents in public libraries within the district (including the mobile library)

The SPD has been screened for the purpose of Strategic Environmental Assessment, and Habitat Regulations Assessment. As statutory consultees, the Environment Agency, Historic England, and Natural England have been consulted, but no response has been received from any of these organisations.

The Council invited people to make representations in writing by post or via email. A total of 11 duly made responses were received from 3 individuals and 8 organisations. The following table sets out a summary of the main comments/issues raised during the consultation, along with a response and where appropriate explaining how these comments/issues have been addressed in the final Supplementary Planning Document.

Representations received outside of the published consultation period do not form part of this summary as they are not deemed to have been duly made.

The Council has considered all consultation responses received to the Meeting Housing Needs SPD. Amendments made to the SPD, which are also set out in the table below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

General Comments

No.	Representation from	Summary of Representation	Response
01	Individual	<p>What exactly do you mean by zero carbon/carbon neutral? Is this in terms of insulation, solar panels, how homes will be heated? Provision of car chargers? Access to public transport (so not just access to a motorway - that is not a carbon neutral option)? There is a lot in this.</p>	<p>Principle 7 of the Meeting Housing Needs Supplementary Planning Document states that planning applications will be expected to have regard to the Council’s adopted ‘Non-statutory Interim Planning Policy Statement: Climate Emergency’, as this is now a material consideration when determining planning applications.</p> <p>The Statement introduces three tools to guide development to help realise Mid Devon’s ambition to become carbon neutral by 2030. In order to achieve this aim and to attain Net Zero carbon for development, each of the tools advocates a fabric first approach, which takes into account embodied carbon, which involves constructing buildings to a high level of fabric standards, including insulation. In addition, the tools give consideration to the need for operational buildings to achieve Net Zero carbon through the principles of: energy efficiency, low carbon heat and renewable energy.</p> <p>Principle 5 of the SPD refers to Policy DM5 of the adopted Local Plan 2013 - 2033, in regard to electric vehicle charging point provision, and should be considered in conjunction with the current requirements set out in Part S of the Building Regulations.</p> <p>Policy S8 addresses the need for ‘development and transport planning to improve accessibility for the whole community and promote the use of sustainable modes of transport’, which includes access to public transport.</p>
		<p>With respect to nutrient neutrality. My understanding is that the NE letter relates to adverse effects (ie adverse effect cannot be ruled out) and not to likely significant effect. I would question the decision to</p>	<p>As the statutory body responsible for issuing guidance regarding prevention of phosphate pollution from new development, Natural England were consulted on the Meeting Housing Needs SPD, along with its supporting Habitats Regulations Assessment (HRA) and</p>

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		<p>screen out nutrients from the HRA process with respect to the Culm and the downstream Exe Estuaries SAC. Because how can potential for LSE be ruled out for the SAC on the basis of the information available? Plus as I note that 'Small parts to the East of the Mid Devon District also fall within the Somerset Levels and Moor Ramsar Tone Catchment area, for which Natural England has set out advice explaining how plans or projects with the potential to have nutrient impacts on Habitats site should be considered when making decisions in relation to planning.' As this is the case, I don't understand how a decision on no LSE has been made as there is no evidence to show any consideration of potential connectivity to that site and therefore no evidence to rule out potential LSE.</p>	<p>Strategic Environmental Assessment (SEA), but have not raised concerns.</p> <p>The Council recognises that small parts of the district fall within the Somerset Levels and Moor Ramsar Tone Catchment area. However, the SPD does not introduce new proposals for development, although it is acknowledged that it does make reference to four existing site allocations within the adopted Mid Devon Local Plan 2013 – 2033. Paragraph 4.5 of the Meeting Housing Needs HRA further states that: 'No relevant types of development that could affect the Somerset Levels and Moors Ramsar are allocated within the Mid Devon Local Plan and Policy DM28 sets out that where development proposals are likely to have a significant effect on a European site an Appropriate Assessment will be required. In which case, planning permission will be refused unless it has been ascertained that with mitigation measures in place the development will not adversely affect the integrity of the site.'</p> <p>To clarify, the HRA process can comprise of up to 3 key stages to assess the potential harm from development plans and projects to International Sites of nature conservation. There are three types of International Sites designations: Special Area of Conservation (SAC); Special Protection Area (SPA); and Ramsar. The first stage of the HRA process involves 'screening' to establish if the development proposals are likely to produce significant effects (LSE).</p> <p>If it is considered that a risk is considered likely, then a second stage is undertaken. This involves carrying out an appropriate assessment (AA) to consider the likely significant effects in greater detail in order to understand what adverse effects the development plan or project would cause. Ways to avoid or minimise any adverse effects would also be considered at this stage.</p>

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			<p>If it is not possible to either avoid or to reduce the impact of the development proposals then they cannot progress. However, there may be exceptional circumstances that may justify development plans. In this instance, a third stage is embarked upon to determine if imperative reasons of overriding public interest (IROPI) exist.</p>
		<p>Housing need - please can you confirm if this is for mid Devon housing need only. It is not sustainable to place housing need from other areas of the county or country in mid Devon. Houses should be provided where needed - otherwise you increase their carbon footprint by commuting and increase demands on infrastructure such as water/sewage, doctors, schools. Putting hte plan at odds with other policies locally and nationally.</p>	<p>A Local Housing Needs Assessment was completed in September 2022 which sets out the housing requirement within Mid Devon for the period between 2020 and 2040. The Council will engage with neighbouring authorities to discuss any implications of 'unmet need' in other areas as part of the forthcoming plan review process. It is therefore beyond the scope of this SPD.</p>
		<p>Is there an option for community energy as per the community housing option?</p>	<p>The Council is supportive of community energy initiatives, however energy schemes fall beyond the remit of the Meeting Housing Needs SPD. Local energy systems are covered within the scope of Policy DM2 of the adopted Mid Devon Local Plan 2013 – 2033.</p>
		<p>Where do utilities get taken into consideration? The need for water/sewage? Schools? Doctors? Non road based transport? The dependence on the M5 corridor and the road network is unsustainable. The limited supply of 6th form provision already means public transport is insufficient. More is needed, not less and certainly not more dependence on the car.</p>	<p>Additional infrastructure may be needed to support new development although this is principally a matter for development plan policy . Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how this will be delivered, subject to viability assessment. Policy S1 supports the creation of sustainable communities, promoting sustainable transport through the delivery of appropriate infrastructure, reducing the need to travel by car. The Council's adopted 'Non-statutory Interim Planning Policy Statement: Climate Emergency' provides guidance on how to achieve this.</p>

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02	Individual	The new housing should be in the Council ownership. They can then influence rents and, if necessary, selling prices and thereby bring housing into affordable prices and availability.	Comments noted. However this would not be attainable for all new affordable housing.
03	Halberton Parish Council	The Parish Council believe that it is essential to provide affordable homes and low-cost social renting for residents of Mid Devon. Demand currently outweighs supply and whilst there is significant housing development being undertaken in both Tiverton and Cullompton the number of affordable homes is often reduced over the time of the build and quite often the cost is beyond those who are seeking an affordable option.	Comments noted. The intention of the SPD is to provide additional guidance to support the delivery of affordable housing within the district, including social rent. Nevertheless, establishing affordable housing targets is a development plan policy matter, informed by local housing needs and viability assessments. As such, it is beyond the scope of supplementary planning documents. However, the SPD does provide guidance on viability assessment.
		In line with providing an affordable option, it does not rest at the cost of purchasing or renting a home. The homes must be built with a view to being carbon net zero – solar panels on the rooves to reduce costs etc. The infrastructure must be present in terms of shops, schools, doctors and dentist surgeries, leisure facilities, walking routes, cycle routes and, most importantly, public transport.	Principle 7 of the SPD states that planning applications will be expected to have regard to the Council’s adopted ‘Non-statutory Interim Planning Policy Statement: Climate Emergency’, as this capable of being a material consideration when determining planning applications. The Statement provides guidance and is a resource which can be used by applicants to help inform the preparation of planning applications submitted to the Council for determination within the Mid Devon area. The Statement can help clarify how the requirements of existing development plan policies can be met in relation to climate change, which can assist the assessment of planning applications, and it underlines that tackling climate change is a material consideration. The Statement introduces three tools to guide development to help realise Mid Devon’s ambition to become carbon neutral by 2030. In order to achieve this aim and to attain Net Zero carbon for development, each of the tools advocates a fabric first approach,

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			<p>which takes into account embodied carbon, which involves constructing buildings to a high level of fabric standards, including insulation. In addition, the tools give consideration to the need for operational buildings to achieve Net Zero carbon through the principles of: energy efficiency, low carbon heat and renewable energy.</p> <p>Additional infrastructure may be needed to support new development. Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how this will be delivered, subject to viability assessment. Policy S1 supports the creation of sustainable communities, promoting sustainable transport through the delivery of appropriate infrastructure, reducing the need to travel by car. The Council’s adopted ‘Non-statutory Interim Planning Policy Statement: Climate Emergency’ provides guidance on how to achieve this.</p>
		<p>With both DCC and MDDC looking to reach carbon net zero building homes in rural locations where car transport is essential to reach the required facilities makes no sense and most families would be required to run two cars at significant cost and pollution as well as wear and tear on roads that are already under strain from the current traffic levels and often have no pavements.</p>	<p>Comments noted, although infrastructure provision is principally a matter for development plan policy and not this SPD. Additional infrastructure may be needed to support new development. Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how this will be delivered, subject to viability assessment. Policy S1 supports the creation of sustainable communities, underpinning both Councils’ commitments to achieving net zero carbon development. The policy promotes sustainable transport through the delivery of appropriate infrastructure, reducing the need to travel by car. The Council’s adopted ‘Non-statutory Interim Planning Policy Statement: Climate Emergency’ provides guidance on how to achieve this.</p>
		<p>Halberton with its limited public transport network does have a number of affordable homes and approved a development to provide four more but</p>	<p>Comments noted and agreed.</p>

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		criteria must be set that ensures that these homes remain affordable and for local residents.	
		A survey of residents throughout MDDC might highlight the area's most in need.	A Local Housing Needs Assessment was completed in September 2022, which sets out the housing requirement within Mid Devon for the period between 2020 and 2040. This assessment was based on a detailed review of past trends and current estimates, in accordance with the Government's standard method for calculating local housing need.
04	Hemyock Parish Council	<p>Hemyock Parish Council believes that current levels of affordable housing in Mid Devon both in terms of property to buy and to rent were insufficient to meet the needs of local residents many of whom were on low incomes. This was resulting in young people leaving the area where they had grown up.</p> <p>The Parish Council is given to believe that there is a growing number of families living in temporary accommodation and in the number of registered homeless.</p>	<p>Comments noted.</p> <p>The intention of the SPD is to provide additional guidance to support the delivery of affordable housing within the district.</p> <p>The Council's Housing department are responsible for arranging temporary accommodation and for recording homelessness. The Council's Housing Enabling Officer's role is to co-ordinate the work of between the Housing and Planning departments in order to establish the quantity and types of housing required within the district.</p>
		It was also noted that Mid Devon had several 'unstainable' villages where new builds could not take place as they did not have access to public transport and amenities.	Comments noted. Policy S1 of the adopted Mid Devon Local Plan 2013 – 2033 details the requirements for sustainable communities.
		The 'Right to Buy' introduced in 1984 had given people the opportunity to get onto the property ladder with funding from the resulting sale going to central government thus the policy had diminished council stock and here was now a shortage.	Comments noted.

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		<p>Affordable homes produced by developers were often outside the financial means of local residents and co-ownership solutions often became problematically when selling a property. Rental properties were also becoming increasingly expensive.</p>	<p>Comments noted. The intention of the SPD is to provide additional guidance to support the delivery of affordable housing within the district, including social rent. However, establishing affordable housing targets is a development plan policy matter, informed by local housing needs and viability assessments. As such, it is beyond the scope of supplementary planning documents.</p>
		<p>The possibility of a 'residency' clause was discussed to keep some property available to those who were already living and working in the area.</p>	<p>Comments noted.</p>
		<p>Affordable did not only relate to the cost of the property or the rent being asked but also the ability to be able to access local amenities. Limited bus services which did not relate to working hours meant that most homeowners now had a minimum of two cars.</p> <p>Devon County Council and Mid Devon District Council are looking to become carbon net zero. Increasing the number of cars in the area does not sit aside this long-term goal and furthermore is not sustainable for low income families.</p> <p>Running cars produced to several problems:</p> <ul style="list-style-type: none"> a) The costs associated with running a car b) Increases in the number of cars meant more roads were going to be unlikely to cope with the levels of traffic particularly given that many were already in a poor state of repair 	<p>Additional infrastructure may be needed to support new development. Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how this will be delivered, subject to viability assessment.</p> <p>Policy S1 supports the creation of sustainable communities, underpinning both Councils' commitments to achieving net zero carbon development. The policy promotes sustainable transport through the delivery of appropriate infrastructure, reducing the need to travel by car. The Council's adopted 'Non-statutory Interim Planning Policy Statement: Climate Emergency' provides guidance on how to achieve this.</p>

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05	Clayhidon Parish Council	Clayhidon Parish Council believes that current levels of affordable housing in Mid Devon both in terms of property to buy and to rent are insufficient to meet the needs of local residents. The Parish Council welcomes the initiative to provide more affordable homes.	Comments noted. The intention of the SPD is to provide additional guidance to support the delivery of affordable housing within the district.
		However, Clayhidon is designated as an 'unstainable' village where new builds cannot take place as they did not have access to public transport and amenities thus preventing the ability to provide homes for those who have grown up in the village.	Comments noted. Spatial strategy and settlement hierarchies are matters for development plan policy and is therefore outside the scope of this SPD.
		New developments should take place within the curtilage of existing villages.	Settlement boundaries exist to manage development in accordance with the spatial strategy for the district. However, there are some circumstances in which development beyond the curtilage of a settlement may be appropriate. The criteria for such development is set out within Policy DM6 of the adopted Mid Devon Local Plan 2013 – 2033
		Affordable does not only relate to the cost of the property or the rent being asked but also the ability to be able to access local amenities. Limited bus services which did not relate to working hours means that most homeowners now had a minimum of two cars. Devon County Council and Mid Devon District Council are looking to become carbon net zero. Increasing the number of cars in the area does not sit aside this long-term goal and furthermore is not sustainable for low income families.	Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how additional infrastructure required to support new development will be delivered, subject to viability assessment. Policy S1 supports the creation of sustainable communities, underpinning both Councils' commitments to achieving net zero carbon development. The policy promotes sustainable transport through the delivery of appropriate infrastructure, reducing the need to travel by car. The Council's adopted 'Non-statutory Interim Planning Policy Statement: Climate Emergency' provides guidance on how to achieve this.

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		The provision of good public transport is very important.	
06	Sampford Peverell Parish Council	<p>Given the amount of new housing development in Tiverton, concern was expressed that MDDC might look to the Tiverton-Sampford Peverell corridor for future development. Government policy was that building should not take place on agricultural land and the corridor was made up of agricultural land which fell outside the settlement areas of Tiverton, Halberton and Sampford Peverell. The current road structure was already struggling to cope with the increase in cars, agricultural vehicles and HGVs.</p> <p>Whilst Sampford Peverell Parish Council recognised the need for affordable housing and social rental accommodation, thought had to be given to ensure that it truly was affordable both in terms of cost and location.</p> <p>Accessibility to good public transport that allowed for people to travel to work and/or school was essential. The majority of people living in a rural area found themselves having to run two cars. This firstly did not meet the affordability concerns and also seem in</p>	<p>Comments noted. Future strategic growth options are matters for development plan policy and therefore beyond the scope of this supplementary planning document.</p> <p>Development proposals beyond existing settlement boundaries are subject to criteria outlined in Policy S14 of the adopted Mid Devon Local Plan 2013 – 2033, and in Policy DM6 which sets out the requirements for rural exception sites.</p> <p>Policy S1, criterion j) ‘encourages the effective use of land, taking into account the economic and other benefits of the best and most versatile agricultural land’.</p> <p>Additional infrastructure may be needed to support new development. Policy S8 sets out how this will be delivered, subject to viability assessment.</p> <p>Comments noted. The intention of the SPD is to provide additional guidance to support the delivery of affordable housing within the district, including social rent. Nevertheless, establishing affordable housing targets is a development plan policy matter, informed by local housing needs and viability assessments. As such, it is beyond the scope of supplementary planning documents. However, the SPD does provide guidance on viability assessment.</p> <p>Additional infrastructure may be needed to support new development. Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how this will be delivered, subject to viability assessment.</p>

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		<p>contravention to DCC's and MDDC's aim of becoming carbon neutral.</p> <p>Prior to further housing development consideration also needed to be given to schooling and the ability of pupils to walk to school.</p>	<p>Policy S1 supports the creation of sustainable communities, underpinning both Councils' commitments to achieving net zero carbon development. The policy promotes sustainable transport through the delivery of appropriate infrastructure, reducing the need to travel by car. The Council's adopted 'Non-statutory Interim Planning Policy Statement: Climate Emergency' provides guidance on how to achieve this.</p> <p>Devon County Council's Education department is consulted prior to both inclusion of housing allocations within the Local Plan and determination of planning applications for residential development. Home to school distances and safe, sustainable modes of travel are taken into consideration at this stage.</p>
		<p>In addition, the Parish Council have concerns about the ability of the local waste water treatment works to cope with additional inputs; there is already a high rate of sewage spillage from the Sampford Peverell WWTW.</p>	<p>Policy S8 of the adopted Mid Devon Local Plan 2013 – 2033, sets out how additional infrastructure will be delivered when required, although this will be subject to a viability assessment. Paragraph 2.53 of the policy's supporting text advises that development will be guided to locations with sufficient sewerage capacity, or require that increased capacity be provided in step with development. It further sets out that sewerage network improvements will be negotiated with developers as and when the need arises.</p>
07	Individual	<p>I have been delighted to discover MDDC are consulting on this document.</p> <p>It has been a very long time coming, but, at last, a local authority is actually considering this kind of housing for its local residents!</p> <p>I have been interested in Co-housing, as an alternative to living alone or in a care home (when I get older) for many years - at least two decades.</p>	<p>Support and guidance noted. The SPD includes reference to co-housing within the section on community housing.</p>

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		<p>It makes sense, in terms of a mutual support network within a housing community.</p> <p>The recent pandemic has demonstrated how we all need to make and retain good connections with our local community, and in my mind, nothing would do this better than co-housing.</p> <p>How we live isn't just about bricks and mortar, it's also about emotional and psychological health and I strongly believe that co-housing can offer support on this level.</p> <p>There are now many co-housing communities across the globe, the first being set up in the Netherlands, some decades ago.</p> <p>For up to date information about the various projects that already exist in the UK and also those currently in development, please follow this link: https://cohousing.org.uk/</p> <p>I do hope MDDC carries this investigation into Community - Led - Housing further and invite them to contact me with the results of this consultation, especially if they are needing members of the public to make further contributions to this initiative</p>	
08	The Planning Bureau Limited on behalf of McCarthy Stone	The Council should initially note that paragraph: 008 Reference ID: 61-008-20190315 of PPG on Plan Making states <i>'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development</i>	Comments noted. The SPD does not introduce additional financial burdens, and does not seek to go beyond the policy requirements set out in the adopted Mid Devon Local Plan 2013 – 2033. The Local Plan has already been subject to both a viability appraisal and impact assessments of new development.

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		<p><i>plan, they cannot introduce new planning policies into the development plan...They should not add unnecessarily to the financial burdens on development’.</i></p> <p>We are concerned that some of the requirements within the Meeting Housing Needs Draft SPD (‘the draft SPD’) may introduce an unnecessary financial burden on development and therefore be contrary to PPG. The Council should ensure that they consider the draft SPD in the context of ensuring that requirements do not add to the financial burden of development.</p>	
		<p><u>Net zero and the Climate Emergency - Principle 7</u></p> <p>The Council’s commitment to meeting both its and the UK Government’s target of net zero carbon emissions is commendable. However, currently it appears that the Council is going to achieve this through Principle 7 of the draft SPD that then relies on applicants having ‘regard to the principles and objectives included in the ‘Mid Devon Non-Statutory Interim Planning Policy Statement: Climate Emergency – Planning Applications Checklist’. This interim guidance itself appears to set a number of measures for consideration in relation to relevant policy and legislative requirements and appears to be trying to achieve net zero.</p> <p>Introducing a more onerous requirement than is in the adopted Local Plan through SPD or non-statutory</p>	<p>Neither the SPD or the ‘Non-Statutory Interim Planning Policy Statement: Climate Emergency’ introduce either new policy, or seek to go beyond the policy requirements set out in the adopted Local Plan 2013 – 2033.</p> <p>The climate emergency is increasingly recognised nationally as a significant material consideration in decision-making and appeals. The ‘Non-Statutory Interim Planning Policy Statement: Climate Emergency’ has been prepared by the Council having regard to national planning policy and relevant legislation, as detailed within Section 3 of the document. Many of the measures suggested within the Statement’s Planning Applications Checklist are commonly utilised within the development industry but serve as an aide memoire. However, the requirements for each development proposal will be considered on a case-by-case basis.</p> <p>The place of sustainable materials, methods of construction, and operational requirements for achieving net zero carbon will be taken</p>

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		<p>guidance is therefore contrary to PPG Paragraph: 008 Reference ID: 61-008-20190315.</p> <p>Given the requirements of para 008 Reference ID: 61-008-20190315 of the PPG on Plan Making as detailed above, the introduction of an embodied carbon policy must not be so inflexible that it introduces a financial burden and deems sites unviable. Any SPD requirement needs to ensure this to make sure it is consistent with NPPF/PPG.</p>	<p>into account during the plan-making stage of the new Local Plan (Plan Mid Devon), and will underpin new policies.</p>
		<p>The Council should note that new development will often be far more sustainable in many circumstances including building fabric and by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site.</p>	<p>Comments noted.</p>
		<p><u>Wheelchair accommodation – Principle 10</u></p> <p>Principle 10 states that <i>‘The Council will work with applicants to explore opportunities to ensure at least 10.5% of all new affordable rented housing and 5.5% of market is wheelchair adapted, in accordance with the findings of the Mid Devon LHNA’</i>. Para 3.5 acknowledges that ‘the adopted Local Plan 2013 does not have a policy on wheelchair housing provision’.</p> <p>It is common for Local Authorities to conflate the needs of ‘wheelchair users’ with the needs of older people in the community. The Council are respectfully reminded that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an</p>	<p>Comments noted. The approach set out in the SPD is to encourage an element of wheelchair adapted housing and not impose specific planning policy requirements. Paragraph 3.5 of the SPD acknowledges that the Local Plan does not have a policy on wheelchair housing provision. This is in response to need identified in the Mid Devon Local Housing Needs Assessment.</p> <p>It is therefore not agreed that the requirement for wheelchair adapted housing should be removed from the Supplementary Planning Document. The SPD does not introduce either new policy or additional financial burdens, and does not seek to go beyond the planning policy requirements set out in the adopted Local Plan 2013 – 2033. The Local Plan has already been subject to both a viability appraisal and impact assessments of new development.</p>

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		<p>appropriate manner of meeting the substantial housing needs of older people. Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. Housing particularly built to M4(3) standard may serve to institutionalise an older persons' housing scheme reducing independence contrary to the ethos of older persons.</p> <p>Given the requirements of para 008 Reference ID: 61-008-20190315 of PPG on Plan Making as detailed above the council should note that wheelchair adapted housing has a cost implication and including such a requirement in an SPD is contrary to national policy and the requirement should be removed from the SPD.</p>	<p>Finally, the Council fully acknowledge that ensuring residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the substantial housing needs of older people. The SPD seeks to facilitate a wide range of housing options for older persons and this is reflected in the SPD.</p>
		<p><u>Section 7: Self and Custom housebuilding</u></p> <p>Section 7 looks at self-build housing and identifies the Local Plan requirement to sites of 20 dwellings or more'.</p> <p>The Council should note that housing for older people, being specialist in nature, is often delivered on brownfield sites separate to housing allocations or other development sites and tend to be high-density flatted developments on small or medium sized sites of around 0.5 hectares located near town centres that</p>	<p>The requirement to provide self and custom build is derived from Policy S3 of the adopted Mid Local Plan 2013 - 2033. The Meeting Housing Needs SPD simply seeks to support delivery of that policy. Viability impacts will need to be considered on a case by case basis.</p>

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		<p>have a minimum amount of around 35 to 40 units. There is therefore not room for self-build plots on site.</p> <p>Older person's housing schemes are already marginal with respect to viability and as it is impractical to deliver self-build plots on site, the proposed threshold is not suitable for specialist housing for older people schemes. The threshold for the provision of self-build plots should be reconsidered and the requirement applied to units over a certain area for example 1 hectare or an exemption provided for older persons housing schemes.</p>	
09	Tiverton Neighbourhood in Action	<p>The TNP <i>[Tiverton Neighbourhood Plan]</i> commissioned its own Housing needs assessment in September 2019 conducted by AECOM.</p> <p>It found that between 2009 and 2018 house prices in Tiverton increased by an average of 28% which is higher than both district and national rates. Comparing these prices to median and low affordability thresholds it concluded that the most affordable tenures in Tiverton were social rent, affordable rent and Shared Ownership. I see from your report that there has been <i>[sentence submitted uncompleted]</i></p> <p>My understanding is that all new housing developments should contain at least 30% 'affordable' housing being roughly 80% of the value of market housing I believe but this is still not affordable. Two salaried households are still unable to afford to buy</p>	<p>Comments noted. The SPD seeks to support increased delivery of social rent, affordable rent and shared ownership.</p> <p>Comments noted. The quantum of affordable housing is a matter for Local Plan policy and not for this supplementary planning document which seeks to support delivery of Local Plan policy requirements. However, in terms of tenure, the SPD seeks to provide a range of</p>

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		<p>locally. According to your report there is still a huge amount of unmet need with poor achievements against planned numbers in the last few years. If a housing development scheme including affordable housing doesn't work financially, it's usually because too much has been paid for the land, and that developers and landowners would negotiate lower prices if they knew they could not escape their obligations. This needs to be addressed to enable planned affordable housing to be realised.</p>	<p>affordable housing products in response to the findings of the Local Housing Needs Assessment (2022).</p>
		<p>Instead there is a huge amount of market housing bringing in more people to live in the area putting a strain on local resources when local people are struggling with the cost of living crisis, overcrowded living conditions and homelessness. This needs to be addressed urgently.</p>	<p>Comments noted. The SPD seeks to support delivery of a wide range of housing products including affordable rent, social rent, affordable home ownership, first homes, community led housing, custom and self-build in an attempt to diversify the housing market in Mid Devon.</p>
		<p>I understand Mid Devon is falling behind on the number of self-build housing plots they are offering for sale to enable people to build their own homes as an alternative affordable option. This needs to be improved.</p>	<p>Comments noted. Policy S3 of the adopted Mid Devon Local Plan 2013 – 2033, coupled with guidance within the SPD, seeks to enable delivery of custom and self-build homes to fulfil the Council's statutory duties.</p>
		<p>With the growing impact of climate change and food insecurity the relaxing of planning laws to enable people to live sustainably on their smallholdings should be encouraged.</p>	<p>Comments noted. This is a matter for development plan policy and is therefore outside the scope of this SPD.</p>
		<p>In addition I would wholeheartedly support the initiative to set aside affordable housing for local essential workers with some kind of basic assessment criteria to enable them to be affordably housed</p>	<p>Support noted. Supermarket workers are included within the key worker definition in Appendix 2 of the SPD, but in terms of specific roles such as 'Retail</p>

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		locally. I would also include salaried supermarket workers in this definition as it was very apparent during Covid lock down how essential their jobs are.	cashiers and check-out operators’, ‘Shelf fillers’, and ‘Stock control clerks and assistants’.
10	Tetlow King Planning on behalf of the South West Housing Association Planning Consortium (SWHAPC)	<p>Introduction</p> <p>Paragraph 1.4 of the Introduction outlines that there is a <i>“particular focus on affordable and social rent properties alongside a strong commitment to having low carbon, accessible and adaptable homes.”</i> (Emphasis added)</p> <p>The SWHAPC supports this focus on affordable housing and is pleased with the attention that is given to affordable housing in this introduction. Notwithstanding this, the Council must demonstrate that the commitments of low carbon, accessible and adaptable homes will not result in fewer affordable homes being delivered because of reduced financial viability of residential schemes.</p> <p>Affordable Housing</p> <p>The Draft SPD sets out the national affordable housing definition at paragraph 2.1. In order for the SPD to remain relevant and up-to-date, we recommend that it refers readers to Annex 2 of the National Planning Policy Framework (NPPF).</p> <p>Paragraph 2.3 and corresponding Table 1 refer to the Mid Devon Local Housing Needs Assessment (LHNA), completed September 2022, which is the most recent housing needs assessment for the area. While this will ensure that affordable housing is provided in line with</p>	<p>Support noted. The SPD does not introduce additional financial burdens, and does not seek to go beyond the planning policy requirements set out in the adopted Local Plan 2013 – 2033. The Local Plan has already been subject to both a viability appraisal and impact assessments of new development.</p> <p>Comments noted the wording within the SPD currently states that ‘A full definition of affordable housing is provided in the National Planning Policy Framework ...’. This allows for future amendments to the National Planning Policy Framework, including to annexes.</p> <p>Amendment agreed.</p> <p>Paragraph 2.3 to be amended to read: The Mid Devon Local Housing Needs Assessment (LHNA, completed September 2022, or any subsequent update) provides evidence of</p>

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		<p>current objectively assessed needs, to allow the SPD to remain relevant, the SWHAPC recommends that the SPD also refers readers to the <u>most up to date assessment of housing need</u>.</p>	<p>housing mix requirements, by bedroom size that would enable both affordable and market housing need to be met.</p> <p>The caption for Table 1 to be changed to read: Table 1: (Based on Figure 53 <i>'Overall need' of the LHNA, completed September 2022</i>)</p>
		<p>Furthermore, paragraph 2.6 outlines that 60% of affordable homes should be provided in the form of social rented units, and 19% in the form of affordable rented units. This represents a significant contrast to the current Local Plan policy, which assumed a tenure mix of 60% affordable rent and 40% intermediate tenures. The SPD explains that it does not seek to supersede existing development plan policy but does refer to the latest housing needs evidence to ensure that an appropriate mix of types and tenures of affordable housing are provided. The SWHAPC accepts the Council's position at paragraph 2.6 given that the Council recognises that the SPD cannot supersede existing plan policy.</p>	<p>Support noted.</p>
		<p>First Homes</p> <p>Principle 1, set out on page 9, outlines that in accordance with adopted Local Plan Policy S3, the Council will seek the provision of affordable housing in accordance with the following proportions:</p> <ul style="list-style-type: none"> ● Affordable Rent*: 60% 	<p>Comments noted. The concerns raised are acknowledged and it is recognised that a more flexible approach is needed given that the LHNA only shows a need for 4.4% of affordable homes to be First Homes. Accordingly the following changes have been made to the SPD.</p> <p>Paragraph 2.9 to be amended to read:</p>

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		<ul style="list-style-type: none"> • Affordable Home Ownership (excluding First Homes): 15% • First Homes (Discounted by a minimum of 30%): 25% <p>The SWHAPC are concerned about having to provide First Homes on smaller directly-procured sites which are 100% affordable. The SWHAPC therefore request that the guidance allows First Homes to be provided as social rent instead as this would enable the delivery of a higher proportion of affordable housing. Given that the Mid Devon LHNA shows a need for only a 4.4% of affordable homes to be First Homes (as opposed to the government requirement for 25%), it would be advisable for there to be more flexibility in the wording around their provision on a site by site basis. The SWHAPC has long had concerns about the introduction of First Homes and its potential implications on the delivery of traditional forms of affordable housing, particularly that it undermines the delivery of Shared Ownership properties.</p>	<p>The Mid Devon LHNA (Figure 53) shows a calculation based purely on ability to access the product, which that assumes a 70% First Homes discount results in only 4.4% of affordable homes being First Homes. This is significantly less than the Government’s requirement of 25%. The Mid Devon LHNA undertakes additional sensitivity testing in order to meet the Government’s First Homes target, although these will be matters which will be investigated further <u>as part of</u> the preparation of a new local plan for Mid Devon (“Plan Mid Devon”). In the interim, <u>the Council will adopt a flexible approach to the delivery of First Homes. Whilst the Council recognises that the Written Ministerial Statement is a material consideration in planning decisions, on the basis of current need for First Homes, they are unlikely to be the Council's preferred form of affordable housing. Provision of First Homes will therefore be considered on a case by case basis. The Council will monitor need for, and delivery of, First Homes and continue to negotiate the most appropriate mix of housing types to meet local needs.</u> for the purpose of determining applications in relation to the adopted Local Plan Policy S3, adjustments are made to the tenure mix to achieve the Government’s First Homes policy target and to reflect the viability and policy considerations in relation to securing social rented homes through the planning process.</p> <p>The bullet points at paragraph 2.10 are amended as follows:</p> <ul style="list-style-type: none"> • Affordable Rent (including social rented housing) (60%) • Affordable Home Ownership (excluding First Homes) (15%) <u>(including a proportion of First Homes) (40%)</u> • First Homes (discounted by 30%) (25%)

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			<p>Principle 1 to be amended as follows:</p> <p>In accordance with adopted Local Plan Policy S3, the Council will seek the provision of affordable housing in accordance with the following proportions:</p> <ul style="list-style-type: none"> • Affordable Rent*: 60% • Affordable Home Ownership <u>(including a proportion of First Homes): 40%</u> (excluding First Homes): 15% • First Homes (Discounted by a minimum of 30%): 25% <p>*The Council will work with applicants to explore the potential for an element of social rent housing to be included within affordable housing proposals, subject to viability and local housing need</p>
		<p>Dwelling Size Mix</p> <p>The SWHAPC welcomes Principle 2, set out on page 9, which provides guidance on affordable housing tenures and sizes. The SWHAPC also supports Principle 3, set out on page 10, which outlines that the Council’s Housing Enabling Service will work positively with applicants to help achieve suitable and optimal mix of housing types, sizes and tenures in development proposals submitted for determination to meet identified affordable housing needs.</p>	<p>Support noted.</p>
		<p>Standards of affordable housing</p> <p>Paragraph 2.17 states that all homes must comply with internal Nationally Described Space Standards (NDSS). The SWHAPC accepts the NDSS guidance given the NDSS is already adopted in the Local Plan, although we would like to remind the Council how the increased delivery of such properties may affect</p>	<p>Comments noted. However, as identified, Policy DM1, criterion h), of the adopted Mid Devon Local Plan 2013 – 2033, states that designs of new development must be based upon internal Nationally Described Space Standards.</p>

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		<p>viability and overall affordable housing delivery in Mid Devon. Additionally, many households eligible for affordable housing in Mid Devon may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. There will be occasions where it is neither practical nor necessary to achieve the standards.</p>	
		<p>Timing of affordable housing</p> <p>The SWHAPC agree with paragraph 2.28, that affordable housing should be provided broadly in-step with market housing as the development progresses and should be inter-mixed with it across the site.</p>	<p>Support noted.</p>
		<p>Layout and Design</p> <p>Paragraph 2.33 states that social and other affordable housing which is segregated from other housing provision, and has a distinguishing design approach, can lead to problems. The SWHAPC agrees that tenure blind development should be applied in practice.</p> <p>Paragraph 2.34 outlines that there should also be a genuine intermixing of tenures within a scheme with affordable housing distributed across a site rather than concentrated in any one area, often referred to as “pepper potting”. The SWHAPC agrees with these points. The distribution of affordable housing within housing schemes should allow for social integration within the overall design, although the SWHAPC reminds the Council to consider the practical implications for housing associations when it comes</p>	<p>Comments noted. Paragraph 2.34 to be amended to reflect the design and layout principles for affordable housing set out in the National Design Guide and to allow for a more flexible approach to take into account management implications whilst still ensuring there is no segregation or difference in quality between tenures.</p> <p>Paragraph 2.34 to be amended to read:</p> <p>It is therefore important that the design of new housing areas which include affordable housing take a “tenure neutral blind” approach to location and design. Under such an approach it should not be possible to distinguish the tenure of a dwelling from its external appearance. Similarly, there should be a genuine intermixing of tenures within a scheme with affordable housing distributed across a site rather than concentrated in any one area, often referred to as “pepper potting”. As set out in the National Design Guide, there should be no segregation or difference in quality between tenures</p>

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		<p>to the management of their housing stock. Encouraging pepper potting across a scheme makes management more difficult as the properties are more spread out. The SWHAPC would not encourage affordable housing to be grouped together in one area, instead recommending that affordable housing is clustered across a site, with policy expressing a maximum group size or range; approximately 10 dwellings forming each cluster on larger sites (circa 100+ dwellings) is often favoured.</p>	<p><u>by siting, accessibility, environmental conditions, external façade or materials. Homes of all tenures should be represented in equally attractive and beneficial locations, with no differentiation in the positions of entrances. Shared open or play spaces should also be accessible to all residents around them, regardless of tenure.</u></p>
		<p>Registered Providers</p> <p>It is noted in paragraph 2.36 that all affordable housing must be retained in perpetuity. The sole reference to retaining affordable housing in perpetuity is in Annex 2 of the NPPF where this is sought for affordable housing delivered on Rural Exception Sites. This principle is appropriate and supported by our Members as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.</p>	<p>Support noted.</p>
		<p>However, securing affordable housing in perpetuity more widely is not supported for a number of reasons. Foremost is that it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. We therefore</p>	<p>Comments noted. However, the Council requires that all affordable housing is subject to arrangements to ensure that it remains available to eligible households in perpetuity.</p>

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		request that all references to securing affordable housing in perpetuity are removed from the Draft SPD unless they are made specifically in relation to Rural Exception Sites.	
		<p>Assessing Rural Need</p> <p>The SWHAPC is encouraged to see that Principle 8 states that the Council’s housing register is recognised as an appropriate evidence base for affordable housing proposals. The benefits of including the housing register as an acceptable evidence base include that it is robust, up-to-date and often reasonably easy to access for applicants. It can assist in providing evidence of local housing need where housing need assessments may not be preferable.</p>	Support noted.
		<p>Accessible and adaptable homes / Wheelchair accommodation</p> <p>The SWHAPC agrees with the contents of Principle 9 and 10, in that new housing development should be of high quality in terms of its design and resilience, and provide adequate space to achieve good living standards, as required by the NPPF. We accept that there is a growing need for properties which comply with Part M(2) or Part M(3) of the current Building Regulations and so we support this policy direction, although we would like to remind the Council how the increased delivery of such properties may affect viability and overall affordable housing delivery in Mid Devon.</p>	Comments noted. The SPD does not introduce either new policy or additional financial burdens, and does not seek to go beyond the planning policy requirements set out in the adopted Mid Devon Local Plan 2013 – 2033. The approach in the SPD is simply to set out the current evidence of need and encourage provision as far as reasonably practicable.

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		<p>Community Led Housing</p> <p>Paragraph 4.3 outlines that the Council is committed to working with Community Land Trusts ('CLTs') and other organisations to deliver homes retained in perpetuity for local need. Furthermore, paragraph 4.15 recognises that while the inclusion of CLTs in the provision of affordable housing on allocated housing sites would not deliver any additionally in terms of the quantum of affordable housing delivered, it would:</p> <ol style="list-style-type: none"> 1. Encourage communities to support new developments in exchange for securing a genuine stake in them, and; 2. Ensure that affordable rented homes are protected from the various current forms of right to buy. <p>Given the Council's comments in this Draft SPD, we would like to use this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people, particularly in rural areas. The Council may find it insightful to know that a number of the SWHAPC Housing Associations have delivered significant levels of affordable housing through partnerships with CLTs across the south of England. It is positive to see acknowledgement of this working relationship in the Draft SPD.</p>	<p>Support noted. The Council acknowledges the successful proven track record of delivering affordable housing via partnerships between CLTs and Housing Associations. The Council welcomes continued close working to facilitate further delivery.</p>
		<p>Delivery of Affordable Custom and Self-Build</p>	<p>Support and guidance noted.</p>

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		<p>The SWHAPC encourages the inclusion of affordable custom and self-build dwellings as it offers another route toward affordable housing. We support the conditions listed at paragraph 7.54 which ensure that affordable custom build plots will be delivered to those most in need of them. Self-build or custom build helps to diversify the housing market and increase consumer choice. The SWHAPC advises that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy.</p>	
		<p>Further comments</p> <p>These comments are meant to be constructive, to ensure planning for development remains a proportionate process, aiming for high standards of sustainability without placing unduly onerous expectations at the earliest stages of planning. The Guidance should remain supplementary to the existing adopted planning policies, and not seek to place additional burdens with implications for costs.</p>	<p>The SPD remains supplementary to the policies in the adopted Mid Devon Local Plan 2013 – 2033. It does not introduce additional financial burdens, and does not seek to go beyond the planning policy requirements set out in the Plan. The Local Plan has already been subject to both a viability appraisal and impact assessments of new development.</p>
11	Tiverton Civic Society	<p>Members of Tiverton Civic Society have carefully read the draft document, and we consider that it is comprehensive, aspirational and excellent in all respects, and that, in some elements, it represents a considerable advance on previous documents and policies.</p>	Support noted.
		<p>We appreciate the 21 Principles, in each case preceded by a clear description, and we consider that Mid Devon's housing needs are clearly expressed,</p>	Support noted.

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		<p>especially the desire to meet affordable and socially rented targets on all developments, as well as the embracing of First Home principles, An important principle is intermixing or 'pepper potting' of the various types of housing, all being indistinguishable in general design.</p>	
		<p>We appreciate the section on Community Led Housing, '<i>considerable positive weight will be given to proposals where it is clear that the proposal is genuinely community led and genuinely community supported</i>', and the importance of Community Land Trusts. However, as has been expressed elsewhere, there may well be difficulties encouraging sufficient volunteers to come forward.</p>	<p>Comments noted.</p>
		<p>We appreciate the statement that '<i>Rural Exception Sites are the sole permissible type of exception site in Mid Devon outside towns</i>' (P.15), although this could clash with Class Q proposals, as with the recent application 23/00761/FULL, and housing developments immediately adjoining towns e,g,if approved, the present Hartnoll Farm proposals 21/01576/MOUT.</p>	<p>Comments noted. The wording as drafted is intended to make clear that Mid Devon does not have entry level exception sites. However, it is recognised that other forms of development, including Class Q proposals will continue to take place outside of the towns.</p>
		<p>Is the wording of Principle 11 on bungalows strong enough? Despite the obvious need, developers are notoriously reluctant to build bungalows, and some element of coercion or encouragement may be needed!</p>	<p>Comments noted. However, the SPD cannot introduce new development plan policy, such as explicit requirements to deliver bungalow development.</p>
		<p>We appreciate the considerable detail provided on the need for satisfactory measures to secure sites and</p>	<p>Support noted.</p>

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		pitches for gipsies and travellers, as well as the provision of homes for travelling show people.	