

## **Mid Devon Housing Delivery Test Action Plan 2025**

**April 2025**

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## **1.0 Introduction**

### *The need for this Action Plan*

- 1.1 The Council is required to prepare this Action Plan since the 2023 Housing Delivery Test measurement (published 12 December 2024) shows that in the last three years the total number of new homes completed in Mid Devon district has been less than 95% of the total number of new homes needed in that period.
- 1.2 This is the first time that an Action Plan has been needed in Mid Devon. The Action Plan includes:
- A context for why new homes are needed and are planned for
  - Why the number of new homes each year are monitored
  - An analysis of past delivery of new homes
  - Identifies matters that have affected housing delivery, including reasons for under-delivery
  - A set of 18 actions the Council intends to take to improve the levels of housing delivery in the future

## **2.0 Context**

### *National housing crisis*

- 2.1 There is a housing crisis nationally and this is reflected locally in Mid Devon. Having a home is a basic necessity that provides shelter, security and can support health and well-being. Whether homes are owned, rented, in single occupancy or shared with others, the simple fact is that for many their home is not suitable to meet their needs and having a suitable home may not be affordable. Nationally, for many years there have not been enough new homes being built to meet our needs, and there has been an increasing gap between the price of those homes and being able to afford to buy or rent them – the cost of new homes has risen higher than wages. In Mid Devon (2019) full time employees can typically expect to spend around 9.3 times their workplace-based annual earnings on purchasing a home, higher than the England average ratio of 7.8. Average income in Mid Devon remains below the national average with a relatively low-pay economy, which means that local house prices are too high for many on low-medium incomes to afford.

### *Planning for new homes*

- 2.2 The Council has a key role in the delivery of new homes in Mid Devon, both as the Local Planning Authority facilitating new homes through the planning process and as a Housing Authority responsible for providing and maintaining a retained stock of council houses. The Council's role as a Local Planning Authority is to help facilitate the delivery of new homes through the planning

process, through the preparation of local plans and through making decisions on planning applications that are submitted for determination. The planning process also provides a means to secure the delivery of much needed affordable housing through new development which is kept affordable in perpetuity.

#### *Monitoring delivery*

- 2.3 National planning policy requires that local planning authorities should monitor progress in building out sites which have planning permission. This work is undertaken by the Council and is used to help inform statutory returns to Government including the annual Housing Flows Reconciliation Form and Affordable Housing Delivery Statistics. The Council is also required to prepare and publish an Annual Monitoring Report ('AMR')., Housing completions data is published on the Council's website as part of housing land supply statements: [Housing Land Availability - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/housing-land-availability)
- 2.4 The number of net new homes monitored includes permanent new residential dwellings. It excludes replacement dwellings, bringing existing homes back into residential use, temporary permissions and units for holiday use. The delivery of residential pitches for Gypsies, Travellers and residential plots for Travelling Showpeople is monitored separately and does not form part of the Housing Delivery Test.

#### *What is the Housing Delivery Test?*

- 2.5 The Housing Delivery Test is an annual measurement of housing delivery in Mid Devon district. It is calculated using the Government's rule book and the results are published each year. The Housing Delivery Test is a percentage measurement of the number of net homes delivered against the number of homes required (currently as set out in the adopted Mid Devon Local Plan), over a rolling 3 year period. If housing delivery falls below the housing requirement in a plan-making area, as indicated by the Housing Delivery Test, policies set out in the NPPF (Paragraph 79) will apply to that plan-making area with immediate effect. The policy consequences that are applied are:
- a) Where delivery falls below 95% of the requirement over the previous three years the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
  - b) Where delivery falls below 85% of the requirement over the previous three years the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement to prepare an action plan;
  - c) Where delivery falls below 75% of the requirement over the previous three years the presumption in favour of sustainable

development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.

- 2.6 The most recent measurement (2023) for Mid Devon shows that the percentage achieved for the period 2020 to 2023 is 86%<sup>1</sup>.

Housing Delivery Test: 2023 measurement for Mid Devon											
ONS Code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2023 measurement	Housing Delivery Test: 2023 consequence
		2020-21 <sup>2</sup>	2021-22	2022-23		2020-21	2021-22	2022-23			
E07000042	Mid Devon	244	365	358	967	337	238	253	828	86%	Action plan

[Housing Delivery Test - GOV.UK](#)

*Why is the Housing Delivery Test Action Plan being prepared?*

- 2.7 Since the percentage achieved is less than 95% there is a requirement for the Council to prepare an Action Plan.
- 2.8 Planning Practice Guidance stipulates that action plans should 'identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery. It sets out a range of actions that local planning authorities can consider as part of the action plan.

*Local Plan housing target and past trends of housing delivery*

- 2.9 The Mid Devon Local Plan was adopted 29<sup>th</sup> July 2020 and covers the period 2013 to 2033. This sets an annual housing target of at least 393 new homes each year to be delivered through the planning process from. This includes new homes on sites allocated for development in the local plan, and windfall sites (which could include the subdivision of existing dwellings, the conversion of suitable buildings etc.). The local plan also includes one contingency site.
- 2.10 Table 1 shows the number of net house completions monitored each year in relation to the local plan annualised target:

<sup>1</sup> However, there is a minor discrepancy between the figures published for 2022-23 in the Housing Delivery Test 2023 measurement (which records 253 completions) and the related Live tables on Housing Supply (which records 249 completions) – The Council confirms that 249 is the correct figure for 2022-23 and has therefore recalculated the HDT results on this basis – giving a figure of 85% rather than the currently published 86% result. The Council will write to MHCLG to request this is updated.

<sup>2</sup> Housing Delivery Test 2023 Technical Note: For the 2023 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a 3-year period, but an 8-month period has been used for the 2020/21 monitoring year; requirement is assessed from 1 August 2020, meaning that 243 days are assessed. This is to account for the considerable variations in levels of housing delivery as local planning authorities and construction industry faced disruption on a national, regional, and local level due to the pandemic. No adjustment was made in the 2021/22 and 2022/23 monitoring years.

<b>Table 1 Mid Devon Net House Completions 2013 – 2024</b>			
<b>Year</b>	<b>Total net house completions</b>	<b>Annualised target in local plan</b>	<b>Shortfall / surplus</b>
2013/2014	320	393	-73
2014/2015	316	393	-77
2015/2016	288	393	-105
2016/2017	304	393	-89
2017/2018	502	393	+109
2018/2019	432	393	+39
2019/2020	425	393	+32
2020/2021	335	393	-58
2021/2022	238	393	-155
2022/2023	253	393	-140
2023/2024	499	393	+106
TOTAL	3,912	4,323	
2024/2025*	*	393	*
*Data not yet available			

- 2.11 The above table shows that completions over the plan period to date (2013 – 2024) were 3,912. Against a total requirement of 4,323 over the same period, this represents a shortfall of 411 homes, which is marginally over one years' worth of completions. However, this is on the basis of the current adopted housing requirement of 393 dwellings per annum and not the revised standard method calculation of 572 that will be used as the baseline of five year housing land supply calculations from July 2025. This will inevitably result in the level of shortfall increasing significantly. This change could not have been anticipated at the time the local plan and its associated evidence base was prepared and therefore it is highly unlikely that the current local plan (and the flexibility measures / interventions contained within the plan) could respond to this uplift in full. Nevertheless, it is important to consider whether there are any current barriers to delivery in Mid Devon and what measures the Council is able to take to boost housing delivery in the short term.

### **3.0 Matters that have affected housing delivery, including reasons for under-delivery**

#### *Barriers to early commencement*

- 3.1 The adopted local plan identifies Cullompton as the strategic focus for development. This includes land allocated at North West Cullompton (Policies CU1-CU6) and East Cullompton (Policies CU7-CU12), the latter of which is

intended to form part of a much larger development of the proposed Culm Garden Village.

- 3.2 There are a number of infrastructure constraints that have to date, posed a barrier to early commencement of development on strategic allocations. The delivery of the local plan strategy at Cullompton is contingent on the delivery of a Town Centre Relief Road and a strategic intervention at Junction 28 of the M5. The former is required to unlock the residual balance of development at North West Cullompton (excluding the 590 homes currently committed / under construction) as well as the first 500 homes at East Cullompton (Culm Garden Village). Thereafter, a strategic intervention at Junction 28 is required to unlock the remainder of the planned growth for Cullompton. Whilst there have been a range of barriers to delivery previously, not least due to unprecedented increases in construction costs, and technical scheme design issues, significant progress has been made in recent years in securing funding and facilitating the timely provision of infrastructure to unlock housing delivery.
- 3.3 Namely, the Council has secured a full funding package via Homes England's Housing Infrastructure Fund to enable deliver of the Cullompton Town Centre Relief Road (CTCRR). The CTCRR secured planning permission in January 2021 and completion is forecast for 2028. It will form the first phase of major road infrastructure investment in Cullompton with further investment expected to support the upgrading of Junction 28 in order to address the capacity of the junction and support wider planned growth. A further business case for investment in Junction 28 is currently with the Government for consideration.
- 3.4 There are a number of pre-commencement conditions to address prior to construction of the CTCRR taking place and the Council will work proactively with stakeholders to ensure these are discharged in a timely manner to facilitate adherence to the target completion date of 2028.
- 3.5 Overall, whilst the aforementioned infrastructure projects are critical to delivering the strategy of the local plan as a whole, it is not considered that they are currently a significant barrier to development in the short term. The first phase of development at North West Cullompton is already well advanced and the delivery of the CTCRR in 2028 will enable delivery to continue in a timely manner.

*Barriers to delivery on sites identified as part of the 5 year land supply*

*(Such as land banking, scheme viability, affordable housing requirements, pre-commencement conditions, lengthy section 106 negotiations, infrastructure and utilities provision, involvement of statutory consultees etc.)*

*Viability*

- 3.6 Development viability may be a potential barrier to housing delivery in Mid Devon. However, anecdotally, only a handful of schemes are known to the



Council to have had difficulty moving forward due to viability. Notwithstanding challenges facing the housing development industry through high inflation, increased costs of energy and materials, and labour supply shortages, there is no evidence to suggest that scheme viability presents a significant issue in Mid Devon. Developer activity across the district indicates that Mid Devon is an attractive place to build houses and interest from the development industry is favourable. Nevertheless, the Council will undertake a full review of development viability and the cost impacts of local plan policy interventions as part of its review of the Local Plan. This will test a range of site typologies, as well as proposed policy and infrastructure requirements in accordance with Planning Practice Guidance to give developers certainty that the cost of development will not undermine its deliverability.

### *Market influences*

- 3.7 It is well established that local planning authorities have little genuine influence over the pace at which any given development is built out beyond a grant of planning permission and timely discharge of conditions, nor any immediate control over prevailing market conditions. Table 2 below shows the current status of plots for new homes granted permission in each year from 2019/2020, including a breakdown of those that have commenced to date and those that remain with extant planning permission. It shows that there is currently provision for 1,251 homes on unimplemented plots within the existing supply. Importantly, this figure excludes any sites that the Council considers to be 'stalled' (e.g. plots with a technical commencement but no recent progress, local plan site allocations that have not come forward etc.) and a number of significant 'live applications' that are currently pending determination, including four applications totalling approximately 523 new homes at Phase 2 of the North West Cullompton Urban Extension<sup>3</sup> and three applications totalling 2,800 new homes at East Cullompton (Culm Garden Village)<sup>4</sup>.

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<sup>3</sup> 19/01592/MOUT (225 dwellings), 19/02058/MOUT (90 dwellings), 22/00729/MFUL (208 dwellings) & 22/01562/MOUT (approximately 250 dwellings) – Available to view on Public Access at: Simple Search (middevon.gov.uk)

<sup>4</sup> 23/01440/MOUT, 24/01208/MOUT and 24/01166/MOUT, available to view on Public Access at: Simple Search (middevon.gov.uk)



<b>Table 2 Analysis of the current status (as at February 2025) of new homes granted planning permission in each year in Mid Devon</b>						
	<b>2019/2020</b>	<b>2020/2021</b>	<b>2021/2022</b>	<b>2022/2023</b>	<b>2023/2024</b>	<b>ALL</b>
Plots currently under construction	17	25	158	160	52	412
<b>Plots currently unimplemented</b>	<b>/</b>	<b>6</b>	<b>199</b>	<b>722</b>	<b>324</b>	<b>1251</b>
Expired Plots	2	31	26	/	/	59
Stalled plots	7	/	/	/	/	7
Superseded	/	3	7	2	/	12
All Plots	26	65	390	884	376	1741
Replacements/Residential loss	6	12	17	9	14	
Outline permissions or permission in principle	/	/	1	19	8	

- 3.8 The Competition and Markets Authority's recent study on housebuilding comments on private developer activity noting that '*private housebuilding alone has rarely, if ever, in the past century delivered close to the amount of housing expected under current targets*'. It also found that '*house builder's incentives lead them collectively to build fewer homes than the socially optimal amount and to build them at a rate that is consistent with the local absorption rates – the rate at which homes can be sold without house builders needing to reduce their prices, rather than as quickly as possible.*' With a housing market largely reliant on private developer activity, together with a demonstrable lack of SME builders in Mid Devon, it is considered unlikely that housing delivery will increase significantly over and above current levels.

#### *Delivery of affordable housing requirements*

- 3.9 The delivery of affordable housing requirements may also be posing barriers to delivery. It is well documented nationally that there are significant issues at present with home builders finding it increasingly difficult to fulfil their S106 Affordable Housing requirements due to a lack of bids from Registered

Providers (RPs). The HBF's report, 'Bid Farewell'<sup>5</sup> attributes this to a 'perfect storm' of economic and policy challenges including:

- RPs needing to invest heavily in building safety remediation, tackling damp and mould issues and decarbonising and modernising existing stock;
- Inflation and rising costs – High levels of inflation have been a particular concern, with many RPs struggling with the resulting increases in insurance and maintenance contractor costs;
- Falling interest cover – a metric used to assess the financial viability of Registered Providers;
- Rent increase limit – In April 2023, the then Conservative Government introduced a 7% cap on social housing rent for the 2023-24 financial year;
- Reduced cash flow;
- Grant funding - RPs choosing to buy land and tailor schemes towards their own requirements over purchasing S106 stock as it enables access to grant funding through the Government's Affordable Homes Programme), and;
- Capacity issues – many RPs, especially the larger ones, are concentrating on sites where they can deliver large numbers of affordable homes. This presents particular challenges for SME developers.

3.10 A number of the issues identified above have arisen in Mid Devon, particularly in relation to smaller development schemes. The Government has acknowledged that it is aware of the issue and has committed to work with house builders, local authorities and affordable housing providers to tackle the problem. Unfortunately, any direct action that the Council is able to take in relation to addressing barriers to delivery ultimately leads to a less desirable outcome in terms of meeting the affordable housing needs of Mid Devon.

3.11 The Council is a stock holding authority and a registered provider in addition to the strategic housing authority. There may therefore be some scope for the Council to purchase Section 106 affordable housing opportunities, although clearly the Council's capacity to do so will be very limited and this is a matter for the Housing Revenue Account (HRA). Any action in this regard would need to meet the specific objectives and requirements of the HRA and not be a matter for the Local Planning Authority.

*Whether the mix of sites identified is proving effective in delivering that the anticipated rate*

3.12 The Council recognises that there is a significant lack of smaller development sites within the housing land supply in Mid Devon. Small and medium sized sites can make an important contribution to meeting the housing requirement

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<sup>5</sup> [Bid Farewell AH S106 report Nov 2024.pdf](#)

of an area and are essential for Small and Medium Enterprise house builders to deliver new homes, and are often built out relatively quickly (paragraph 72).

*Whether proactive pre-planning application discussions are taking place to speed up determination periods*

- 3.13 The Council is undertaking proactive pre-planning application for many major development schemes. The Council welcomes and encourages discussions at an early stage before planning applications are submitted and experience shows that pre-application advice can help de-risk development proposals, through saving time, costs and frustration and optimise the potential of a site. The Council will continue to promote and improve its pre-application offering to help ensure that issues are addressed early in the planning process. The Council also continues to proactively seek to support and encourage the delivery of strategic housing delivery sites within the district.

*Planning Application Performance*

- 3.14 Data published by the Government shows that 97% of non-major development decisions are determined within 8 weeks or within agreed time<sup>6</sup> and 88.7% of major development decisions are determined within 13 weeks or within agreed time limit<sup>7</sup>. However, it is important to note that the majority of major decisions are made beyond the 13 week time period but within a timeframe agreed with the applicant as a result of a Planning Performance Agreement, Extension of Time (EOT) or EIA. The use of EOTs clearly should be minimised but they are essential in many cases to provide additional time and flexibility to deal with issues and obstacles that emerge whilst the application is being considered, and to ensure that the right outcome is reached. The Council's Performance Indicators also show that very low numbers of minor and major applications are being overturned at appeal, therefore demonstrating sound decision making by the Council. Accordingly, the Council's planning application performance is not acting as a barrier to housing delivery.

*Section 106 Agreements*

- 3.15 The Council recognises that in some cases, Section 106 agreements take a considerable amount of time from instruction to seal/engrossment. However, there are various parties involved in this process and therefore it is difficult to analyse what causes the delay in this process. Multiparty agreements are by their nature more complicated and take more time to complete. However, whilst the timeframe is dependent on a range of factors, the Council

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<sup>6</sup> [Table P153: district planning authorities performance – speed of non-major decisions, October 2022 to September 2024.](#)

<sup>7</sup> [Table P151: district and 'county matters' planning authorities performance – speed of major development decisions, October 2022 to September 2024.](#)

recognises that the length of time it takes for Section 106 agreements to be sealed/engrossed on both full and outline applications is too long. The Council already seeks to front load section 106 negotiations at pre-application stage and seeks to engage relevant stakeholders. The Council has also streamlined its approach to section 106 agreements including the development of a standard template that covers affordable housing, custom and self-build, first homes and Gypsy and Traveller accommodation requirements. Changes to the legal framework and additional planning requirements can also result in delays in the short term (for example Biodiversity Net Gain) whilst the new requirements are assessed and negotiated between the parties, but thereafter the Council does seek to utilise the lessons learnt to help standardise the process as much as possible and help minimise the time required to complete future agreements.

#### **4.0 Actions to help improve the delivery of new homes**

##### *Strategic Housing Pipeline for Devon and Torbay*

- 4.1 Mid Devon District Council is part of the Devon Housing Commission which was set up Devon's eleven local authorities to address the broken local housing markets across Devon. The Commission has produced a comprehensive report<sup>8</sup> which includes a number of recommendations to influence the significant housing and social policy changes and practical changes that are needed to start to address the broken local housing markets across geographic Devon. As part of the commission, the Council is working with strategic partners to develop a future Strategic Housing Pipeline for Devon and Torbay. This process is being facilitated by Homes England and includes a list private sites (including stalled sites), public sites, local plan allocations and sites within the Housing Revenue Account development pipeline. This will enable partners to understand key sites, priorities and concerns and work collaboratively to facilitate and enable delivery across challenging development sites.

##### **ACTION 1 – Strategic Housing Pipeline for Devon and Torbay**

The Council will continue to work with strategic partners to develop a future strategic housing pipeline for Devon and Torbay in conjunction with Homes England.

##### *Consider alternative models of affordable housing delivery*

- 4.2 The preceding section has identified a number of challenges that can affect the delivery of affordable housing requirements in new development. Where it may not be possible to secure a Registered Provider to deliver affordable homes then the only practical assistance that the Council can offer is to consider an alternative tenure (e.g. discount market sale) or as a last resort, a

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<sup>8</sup> [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#)

payment made to the LPA in lieu of Affordable Housing. This means that that the most acute affordable housing needs (social rent / affordable rent) may not be met in a timely manner in step with open market development, or potentially, at all.

**ACTION 2 – Consider alternative models of affordable housing delivery**

The Council will be flexible in considering alternative models of housing delivery where there are demonstrable issues in securing a Registered Provider to manage Section 106 Affordable Housing opportunities and where it is clear that this issue is posing a significant barrier to delivery.

*Section 106 Affordable Housing Clearing Service*

- 4.3 Homes England launched a Section Affordable Housing Clearing Service in December 2024. This service is to help facilitate and accelerate the sale of uncontracted and unsold affordable homes. It is intended to provide greater visibility of opportunities in one place for buyers and sellers to connect and build new partnerships. House builders can use the service to provide details of affordable homes they have planning permission to build, and this information is then available for Registered Providers and local authorities to view. The Council can liaise with developers to list their sites on the clearing service.

**ACTION 3 – Use the Section 106 Affordable Housing Clearing Service**

The Council will review its supply of current development sites and where appropriate, liaise with developers to list those sites on the Government's Section 106 Affordable Housing Clearing Service.

*Encourage small sites applications*

- 4.4 The preparation of Local Plans and Neighbourhood Plans can provide a means to identify and allocate a choice and range of different types of sites across the district that can be suited to Small and Medium Enterprise house builders. The National Planning Policy Framework requires that local planning authorities should identify land through the development plan and brownfield registers to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless there are strong reasons why this target cannot be achieved. The Council can also seek to encourage planning applications on small sites in suitable locations that are not allocated in the local plan, where proposals would meet relevant policy requirements and would contribute towards achieving sustainable development. Smaller sites may also provide opportunities for schemes involving modern methods of construction (MMC) which have the potential to be implemented more quickly than conventional building methods.

**ACTION 4 – Encourage small sites applications in suitable locations**

In order to support small and medium sized developers, custom and self-builders and community-led housing organisations and boost housing delivery in the short term, the Council will positively encourage planning applications to come forward on small sites (<1ha) in suitable locations that are not identified in the adopted local plan, but are otherwise acceptable in planning terms and would contribute towards achieving sustainable development in accordance with the National Planning Policy Framework.

*Pre-application advice and use of Planning Performance Agreements*

- 4.5 The Council will investigate ways in which its pre-application advice and use of Planning Performance Agreements can be improved, including through making sure the rights skills and resources are available in its planning and legal services.

**ACTION 5 – Provide pre-application advice and use Planning Performance Agreements**

The Council will seek to review its pre-application advice approach and Planning Performance Agreement structure to secure ring fenced resources to prioritise work on housing applications.

*Adopted Local Plan and other development plans*

- 4.6 The adopted Mid Devon Local Plan provides for a minimum of 7,860 dwellings in the period from 1<sup>st</sup> April 2013 to 31<sup>st</sup> March 2033. This includes completions since 2013, commitments (dwellings under construction or with planning permission) and site allocations for new housing development. The Council will continue to determine planning applications for new housing in accordance with policies of the adopted local plan, neighbourhood plans which are 'made' and adopted Devon waste and minerals local plans, unless material considerations indicate otherwise.

[Adopted Local Plan and Policies Maps - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/adopted-local-plan-and-policies-maps)

**ACTION 6 – Support the implementation of adopted development plans**

The Council will continue to determine planning applications for new housing in accordance with policies of the adopted local plan, neighbourhood plans which are 'made' and adopted Devon waste and minerals local plans, unless material considerations indicate otherwise.

#### *Revising existing site allocations*

- 4.7 A review of existing site allocations was undertaken as part of a wider update to the Council's five year housing land supply position. Following a review of the latest monitoring data and the Council's current housing trajectory, the Council is no longer able to demonstrate a supply in excess of five years, albeit only marginally below. However, in July 2025, the Mid Devon Local Plan will become five years old and the new standard method will form the basis of future housing land supply calculations instead of the current adopted housing requirement. This results in a change from 393 dwellings per annum to 572. It is accepted that this will have the effect of significantly increasing the shortfall.
- 4.8 The lack of a five year housing land supply will be a material consideration in the determination of applications going forward and in some cases, will engage the 'presumption in favour of sustainable development' under paragraph 11d of the National Planning Policy Framework.

#### *Release of the contingency site at Tidcombe Hall, Tiverton (Policy TIV13)*

- 4.9 The adopted local plan includes one contingency site for housing. This is Policy TIV13 Tidcombe Hall. This site is identified as a contingency site for residential development (100 dwellings with 28% affordable housing) to be released in accordance with the local plan Policy S4 and subject to certain criteria being met. The policy makes clear that where cumulative completions since 2013 fall below the expected completions total by over two years' worth of the annual target (as expressed in the defined action level for that year), or a five year supply of deliverable sites cannot be demonstrated, the Council will work proactively to bring forward allocations or outstanding planning consents. If this is insufficient to deliver the necessary level of housing, an identified contingency site will be permitted to boost housing supply.
- 4.10 To date, cumulative housing completions within the plan period (2013 – 2033) amount to 3,912 homes, against a target of 4,323 (the 2023/24 action level defined in Policy S4). This represents a shortfall of 411 homes, which is marginally more than one years' worth of completions. However, following a review of the latest housing monitoring data and the Council's current housing trajectory, the Council is no longer able to demonstrate a supply in excess of five years, albeit only marginally below. Additionally, in July 2025, the local plan will become five years and the new standard method will form the basis of future housing land supply calculations instead of the current adopted housing requirement. This results in a change from 393 dwellings per annum to 572. This will have the effect of significantly increasing the level of shortfall. This therefore means that the need for intervention under Policy S4 has been triggered.
- 4.11 Policy TIV13 Tidcombe Hall is identified as a contingency site and not as a full allocation. This is due to the wide range of constraints and sensitivities that were evident to decision makers at the time the Local Plan was prepared.



This is well-documented throughout the adopted local plan evidence base and indeed in the supporting text to the policy which recognises that whilst the site is *'acceptable in some respects there are a number of constraints which make it less suitable than the sites allocated in the Local Plan, including landscape and highway constraints that need to be mitigated'*.

- 4.12 Importantly, however, the measures identified in this Action Plan must have particular regard to all relevant matters pertaining to deliverability, and actions will need to have the effect of helping to boost delivery in the short term to mitigate the housing supply shortfall. The Council has concerns that the current contingency site at Tidcombe Hall is no longer deliverable. It is noteworthy that there is an ongoing 'live' appeal for part of the site, although critically, the appeal site is not congruent with the area identified by Policy TIV13. Indeed, it is the Council's case for that appeal that the proposal is confined to the more prominent and sensitive areas of TIV13, adjoining designated and undesignated heritage assets and excludes the more developable areas included within the area covered by the policy. However, it is understood that part of the TIV13 site (the western parcel) is not currently available for development due to ownership and legal constraints.
- 4.13 Given these issues, it is clear that there are clear deliverability concerns regarding the contingency site at Tidcombe Hall and that a scheme is not capable of coming forward in a way that accords with the local plan. Accordingly, the Council does not propose to release the contingency site.

#### *New Local Plan*

- 4.14 The Council is progressing the preparation of a new local plan ('Plan Mid Devon'). Once adopted, this will replace the current local plan and will cover a period to 2044 (end date to be confirmed). A new Local Development Scheme has been prepared and was approved by the Council on 4<sup>th</sup> March 2025. This indicates the publication of draft plan proposals in the spring 2026 for public consultation, and adoption of the new local plan in the summer 2028. The new local plan will make provision for the level of new housing need using the Government's' Standard Method, through site allocations and policies for determining planning applications for housing on windfall sites.

[Plan Mid Devon - MIDDEVON.GOV.UK](https://middevon.gov.uk/plan-mid-devon)

#### **ACTION 7 – Prepare a new district wide Local Plan**

The Council will expedite the preparation of a new local plan for Mid Devon in accordance with the timetable set out in the Local Development Scheme.

#### *Masterplans*

- 4.15 The Council has prepared masterplan supplementary planning documents for sites that are allocated in the adopted local plan, including the Tiverton

Eastern Urban Extension, North West Cullompton Urban Extension and the East Cullompton urban extension (which will form part of the proposed Culm Garden Village). These site based masterplans can provide more information about what development is planned, the timing of development, what infrastructure is needed and when, and how this infrastructure will be funded and who will be responsible for delivering it. The site based masterplans can be used to help inform planning applications submitted to the Council for determination and the decisions made on these.

[Masterplanning - MIDDEVON.GOV.UK](https://middevon.gov.uk/masterplanning)

[Home | Culm Garden Village](#)

#### **ACTION 8 – Prepare site allocation masterplans**

The Council will continue to prepare masterplans in collaboration with the development industry where these are required to support the implementation of site allocations in the local plan.

#### *Neighbourhood Plans*

- 4.16 There are currently four ‘made’ neighbourhood plans in Mid Devon: Cullompton, Tiverton, Crediton and Silverton and a neighbourhood plan for Willand has passed its local referendum held on 27<sup>th</sup> February 2025. Two other Neighbourhood Plans for the parishes of Newton St Cyres and Lapford are at earlier stages in their production, although Newton St Cyres Parish Council has advised that it has stopped production of its neighbourhood plan. Neighbourhood Plans provide an opportunity to communities to have a greater say in the future development of their local areas, including the allocation of sites for new housing. The Council will continue to support town and parish councils with their preparation and review of neighbourhood plans.

[Neighbourhood planning - MIDDEVON.GOV.UK](https://middevon.gov.uk/neighbourhood-planning)

#### **ACTION 9 – Continue support for Neighbourhood Plans**

The Council continue to advise and support Neighbourhood Plan Groups on the requirements to meet housing need through planning policies and site allocations.

#### *Local Development Orders*

- 4.17 There are no current or proposed Local Development Orders in Mid Devon. However, the Council may consider the potential for use of Local Development Orders should these provide an opportunity to help bring forward development on sites in suitable sustainable locations in advance of the new local plan, where there is a need to do so. This could include new housing.

### *Housing and Economic Land Availability Assessment*

- 4.18 The Council is preparing a Housing and Economic Land Availability Assessment ('HELAA'). This will be an important source of evidence to help identify areas of land across the district which are suitable, available and achievable for development, including housing. While the HELAA does not guarantee that identified land will be allocated for development, and does not indicate that planning permission will be granted, it will be capable of being used to inform plan-making and decisions made on planning applications.

#### **ACTION 10 – Prepare the Housing and Economic Land Availability Assessment**

The Council will conclude the Housing and Economic Land Availability Assessment as soon as practicable and publish this on the Council's website.

### *Call for sites*

- 4.19 The Council undertook a call for sites in early 2021 and sites submitted are currently being assessed as part of the HELAA. A new call for sites was launched in February 2025 to provide an opportunity for new sites to be submitted to the Council and also for updated information on those sites previously submitted.

#### **ACTION 11 – Complete a new Call for Sites**

The Council has launched a fresh 'call for sites' providing an opportunity for landowners and the development industry to bring potential sites for new homes and other forms of development to the attention of the local planning authority.

### *Brownfield sites register*

- 4.20 The Council maintains and recently updated a Brownfield Sites Register for the district. While the Part 1 of the register does not give sites any formal status the Council can consider whether there is merit for the inclusion of sites in Part 2 of the register and for granting permission in principle on these. The Brownfield Register only includes a handful of sites and as Mid Devon is a predominately rural district, there are very limited numbers of sites on previously developed land and of those that are known, they are often highly constrained. It is unlikely that this offers any significant potential to help increase housing delivery in the short term.

[Brownfield Land Register - MIDDEVON.GOV.UK](https://middevon.gov.uk/brownfield-land-register)

**ACTION 12 – Review the Brownfield Sites Register**

The Council will keep the brownfield sites register under review.

*Mid Devon Housing Strategy*

- 4.21 The Council has prepared a Housing Strategy which details key achievements since 2015 and housing plans and actions for the period 2021 to 2025. These plans and actions relate to new homes coming through the planning process and also the management of the Council housing stock. The housing strategy is currently being reviewed.

[Adopted Housing Strategy 2021-25](#)

**ACTION 13 – Review the Mid Devon Housing Strategy**

The Council will keep the Mid Devon Housing Strategy under review.

*Housing Revenue Account ('HRA')*

- 4.22 The Council is a registered Social Housing Provider and has a retained stock of Council owned and managed houses. The Council maintains a sustainable Housing Revenue Account ('HRA') to maintain, refurbish and replace its existing housing stock, including the replacement of houses lost to right to buy. An objective of the current housing strategy is to retain a viable Council housing stock baseline of a minimum of 3,000 properties, deliver 70 new Council homes between 2021 and 2023 and additional 15 homes per annum thereafter to 2025. The Council, via the HRA, is extremely proactive in delivering new HRA stock and in the period 2024 – 2025 has achieved 62 new 'HRA' homes to date. To support this development pipeline, the HRA also seeks external grant funding in order to support and enable the delivery of these new homes.

**ACTION 14 – Maintain the Housing Revenue Account**

The Council will continue to maintain a sustainable Housing Revenue Account.

*Housing Enabling*

- 4.23 The Council in its role as a 'housing enabler' continues to work positively with local communities and site promoters and developers to help facilitate new housing on suitable sites in sustainable locations through the planning process. This work includes:
- Supporting Community Land Trusts in helping to identify sites to meet local housing need and through funding from the Council's community

housing fund and Section 106 for affordable housing. Funding was also recently secured, through devolutions discussions, to directly support the delivery of CLT projects – expected to be in Chawleigh and Thorverton. This proactive work demonstrates the Councils commitment to unlocking CLT projects and supporting the diversification of housing delivery mechanisms.

- Supporting SME house builders and custom and self-build schemes through policies of the adopted local plan. The new local plan will seek to include provision of 10% of its housing requirement on sites no larger than one hectare. This work will help to diversify the housing supply in Mid Devon and increase housing choice.
- Supporting parish based local housing need surveys through membership of the Devon Community Housing Trust. These surveys are capable of being used by local communities to help inform housing schemes, including proposed developments on rural exceptions sites.

#### **ACTION 15 – Continue Housing Enabling**

The Council will continue its role as a Housing Enabler to help facilitate new housing.

#### *Development Management*

- 4.24 The Council will continue to work positively with the development industry in the determination of planning applications for new housing. This will include offering pre-application advice to applicants to help guide the preparation of applications and increase the likelihood of permission being granted. It can also include the use of voluntary planning performance agreements (PPAs) with applicants to agree timescales, actions and resources for handling particular applications and the Council is already utilising PPAs where there is interest in doing so.

#### **ACTION 16 – Development Management**

The Council will continue to work positively with the development industry in the determination of planning applications for new housing.

#### *Infrastructure delivery*

- 4.25 The Council will continue to investigate opportunities to forward fund major infrastructure and is proactive in securing other sources of funding to help pay for the delivery of infrastructure needed to support planned new development. This includes working closely with Devon County Council, Homes England, Highways England, Network Rail, Healthcare Trusts and organisations responsible for waste management, utilities, and digital / telecommunications,

and with other local authorities in relation to cross-border strategic planning and infrastructure matters.

- 4.26 Having secured funding to support the delivery of the Cullompton Town Centre Relief Road (CTCRR), the Council will continue to be proactive in seeking funding required to support the 'strategic intervention' at J28 of the M5 in order to support planned growth around Cullompton. A Strategic Outline Business Case (SOBC) was recently considered by the Department for Transport (DfT) and feedback from Government is currently awaited.

**ACTION 17 – Continue support for infrastructure delivery**

The Council will continue to support the delivery of key enabling infrastructure through lobbying Government, investigating funding opportunities, working with strategic partners.

*Developer round table / engagement with stakeholders*

- 4.27 The Council will investigate setting up a Developer round table with one or more meetings a year. This will provide an opportunity for the local planning authority and developers to discuss the state of the housing market affecting Mid Devon, explore factors affecting the delivery of new homes and seek to identify potential actions that have delayed or preventing housing developments coming forward. However, it should be noted that development sector interest in attending similar events held previously has been limited and so, to avoid wasting resource, the Council will determine interest in such events prior to progressing them.

**ACTION 18 – Engagement with the development industry**

The Council will, subject to developer interest, host a developer round table session with volume house builders, SME builders, planning agents and other stakeholders to inform future iterations of this Action Plan. The Council will invite views on a range of issues including the local housing market, market influences, application timescales, infrastructure barriers, experiences of planning committee as well as any general technical / viability issues. The outcomes of the round table will be used to inform an updated draft of this Action Plan.

**5.0 Monitoring and review**

- 5.1 The Council will continue to monitor the delivery of new homes in the district and will undertake the measures identified in Section 4.0 of this report to help boost delivery. Any developer round table will be used as a means to keep the Housing Delivery Test Action Plan under review and for it to be updated as necessary.