

# National Planning Policy Framework

## Council note on implications for 3313401 – Land at Hartnoll Farm, Tiverton

19 December 2024

1. The revised National Planning Policy Framework (NPPF) was published on 12 December 2024 and for development management purposes took immediate effect.
2. Of particular relevance to the determination of this appeal are those provisions in respect of housing land supply and delivery. Namely, changes made in respect of establishing mandatory housing targets and the reversal of other changes made in December 2023 under the previous Government regarding housing supply.
3. As set out Mr Beecham's evidence<sup>1</sup>, it is accepted that in July 2025 the Mid Devon Local Plan will become five years old. However, until that time, it remains up-to-date and the adopted local plan housing requirement (393 dwellings per annum) continues to form the baseline for five year housing land supply calculations.
4. In July 2025, a fresh five-year housing land supply update will be needed taking into account updated data on housing completions and permissions as well as updated trajectory information for those sites included within the Council's supply. As set out previously, this is a complex and extensive process that requires robust evidence and it is not appropriate to speculate on the outcomes of this process without undertaking any detailed assessment.
5. Importantly, no changes (save to the paragraph number) are made to the text of what is now paragraph 72 of the NPPF and the requirements to identify a supply of specific, deliverable sites for five years following the intended date of adoption, and specific, developable sites or broad locations for growth for the subsequent years 6-10 and, where possible, 11-15 of the remaining plan period. Similarly, no changes have been made to the definitions of 'deliverable' and 'developable' at Annex 2 of the Framework. The Council's evidence presented to this inquiry therefore remains robust and appropriate in the context of the December 2024 revised NPPF.
6. The Housing Delivery Test 2023 measurement was also released on 12<sup>th</sup> December 2024. The result for Mid Devon is 85%<sup>2</sup> therefore requiring the Council to prepare an Action Plan. Importantly however, the result does not currently trigger a need to incorporate a 20% buffer into housing land supply calculations. In preparing an Action Plan the Council will take appropriate action to reduce the risk of under-delivery in future and set out measures that the Council intends to take to improve levels of delivery.

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<sup>1</sup> Paras 3.1 and 3.2 of Rebuttal Proof of Evidence

<sup>2</sup> 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.

7. Furthermore, as set out in the Council's closing submissions<sup>3</sup>, there is no dispute that there is a housing crisis nor that the Government has, for a number of years held a policy aim of significantly boosting the supply of housing. However, it was clear from the consultation proposals then, and remains the case now, that this does not mean departing from a planned system<sup>4</sup>. Should any delivery failure be likely to occur later in the plan period (outside of the 5YHLS) then the plan review process remains the most appropriate vehicle for addressing such issues. Indeed, the Council is progressing a new local plan and intends to set out a revised timetable no later than 6<sup>th</sup> March 2025 as per the Chief Planner's Planning Newsletter issued to local planning authorities by email on 13<sup>th</sup> December 2024<sup>5</sup>. The Council is dedicated to a timely review of its local plan and intends to respond positively to the latest national planning policy changes.
8. Accordingly the Council's housing land supply position (both five year housing land supply and delivery over the residual plan period) and supporting evidence remains unchanged since the close of the inquiry and remains current and appropriate for the determination of this appeal.

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<sup>3</sup> Paras 3-10 of the Council's Closing Submissions

<sup>4</sup> S38(6) of the Planning and Compulsory Purchase Act 2004

<sup>5</sup> [Chief Planner's newsletter December 2024](#)