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Email:

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Planning Policy  
Mid Devon District Council  
Phoenix House,  
Phoenix Lane,  
Tiverton  
Devon EX16 6PP



Dear Sir/Madam

**LOCAL PLAN REVIEW: SCOPING REPORT – REPRESENTATIONS ON BEHALF OF PERSIMMON HOMES (SW) LTD**

We are pleased to be able to enclose representations on behalf of our client Persimmon Homes (SW) Ltd in response to the Mid Devon Local Plan Review: Scoping Report (hereafter referred to as Scoping report) which was published for consultation in July 2013.

Our client has an interest in land to the north west of Cullompton which forms a part of the mixed use allocation AL/CU/1 (74.8 hectare site which is to provide 1,100 dwellings and 40,000 sq.m of B1 or other suitable employment development, alongside community infrastructure and transport enhancements) and comprises part of the proposed North West Cullompton Urban Extension. With this in mind the principal focus of these representations is on land allocations within Cullompton.

**Cullompton**

The Scoping report outlines two options for Cullompton, the first of which is to maintain the existing strategy for the North West Urban Extension whilst the second is to find a different location for such an extension or bring forward a number of other smaller sites across Cullompton.

We strongly support the retention of **Option 1** as the preferred approach for Cullompton. This represents the only effective means of achieving the long term housing need and demand for Cullompton as identified by the Strategic Housing Market Assessment. Furthermore the urban extension would represent a



sustainable development proposal and would provide the best opportunity of addressing the infrastructure requirements that have been identified in association with the scale of development needed in Cullompton.

## **Employment**

We note the conclusions of the Employment Land Review 2013 (ELR) in so far it recommends a significant reduction (10,000 sqm as opposed to the 40,000 sqm currently proposed) in the amount of employment floorspace that the urban extension should be expected to deliver.

The ELR highlights a number of factors which taken together result in the recommendation to reduce the employment allocation:

- The current allocations include proposals for the extension of the Kings Mill industrial estate by some 22 ha (already consented) which effectively doubles the scale of employment land within this area. This is in addition to the 40,000 sqm of floorspace currently proposed as part of the urban extension. The report concludes that the market would be unlikely to be able to support such a scale of additional employment land up to 2031.
- The urban extension is dependent on the delivery of a significant amount of new infrastructure which invariably has a long lead in time. This coupled with the current economic situation within the UK economy results in significant risk in the delivery of employment within the overall scheme;

The ELR recommends the following for the urban extension site:

*"It would be appropriate therefore to plan for modest provision of employment floorspace focused on meeting demand from SMEs for B1 floorspace. Provision of around 2 hectares of employment land would be appropriate as part of the development with potential for up to 10,000 sq.m of employment floorspace."*

We consider that these ELR conclusions should therefore be reflected in the Local Plan Review proposals for the North West Cullompton Urban Extension.

## **Delivery**

We also note that concern is raised within the Scoping Report that no masterplanning exercise for the site has been commenced and as a result no proposals are likely to be brought forward within the immediate future.



Whilst this is clearly the case we suggest that any revised policy should allow a more flexible means of delivery should tangible progress on a Masterplan not be made within a timely manner. Indeed, given that the preparation of a Masterplan will require cooperation from numerous landowners, we consider that if tangible progress has not made within a given timescale parts of the site should be able to be brought forward incrementally. We consider that in such circumstances it is essential that the policy allows for this flexibility so that the site, which is crucial to the Council's future housing trajectory, can be brought forward. In our view this could be achieved without having to prejudice the overall aims of the allocation or the objectives of the suggested Masterplanning process but would appropriately reflect the NPPF's emphasis on actual delivery.

Our client has a proven track record in the timely delivery of development on such sites and would be pleased to work further with the Council in its ambitions for the delivery of this urban extension.

Yours faithfully

*Alex Bullock*

**Alex Bullock** B.Sc (Hons) MSc MRTPI

Senior Planner

For and on behalf of **WYG Environment Planning Transport Ltd**

