



**Mid Devon District Council**

**Local Plan Review: Scoping Report**

**Representation made on behalf of  
Devonshire Homes**

**August 2013**



- 1.1. This brief representation is made in response to the Scoping Report published in July 2013. We welcome the opportunity to engage with the local planning authority in planning for the future needs of Mid Devon beyond the current development plan timescale.
- 1.2. Our response is structured in the same order as the Scoping report and aims to focus on specific questions posed throughout.
- 1.3. Paragraph 1.13 - A key policy driver should be the policy exhortation in paragraph 47 of the NPPF to boost significantly the supply of housing and we welcome the acknowledgement of under delivery of housing.
- 1.4. Paragraph 1.14 – We consider that the forthcoming SHMA should be progressed as a matter of urgency and ensure that any historic shortfall is addressed adequately across the housing market area. WE would welcome clarification of timescales for publication of this important element of the evidence base.
- 1.5. Paragraph 1.30 – we note reference to demographic changes and the high need for affordable housing as stated in the text box under this paragraph. This should be a key driver for seeking to provide a significant boost to housing land supply (to ensure delivery of both market and affordable housing).
- 1.6. Paragraph 1.34 – We comment on growth outside the main centres below, but wish to comment specifically on the Neighbourhood Planning process. In our view, it is for the Local Plan to meet the growth needs of all settlements within the plan area, including villages. Neighbourhood Plans can supplement and complement this identified growth, but planning for villages should not be left to Neighbourhood Planning, which can be used as a charter for non-planning and not meeting objectively defined needs.
- 1.7. Paragraph 2.6 – This paragraph acknowledges the current limited role that villages are seen as playing. We consider that this should change; villages and rural areas have affordable housing needs and the only mean to address is to plan for growth. We concur that the role and status of Bampton should be reviewed in the emerging Local Plan.

1.8. Options (amount and distribution of development) – We consider that the spatial strategy for the plan area requires revisiting. It is unnecessary to specify detailed splits across the district. In our view, an alternative distribution scenario should be explored fully; this could include option 2 and/or option 3. It will be helpful for the local planning authority to spread the load in terms of an additional sources of supply of housing. Allowing for growth in rural areas taps into a different market that means that objectively defined needs are more likely to be met. As an illustration, delivery of 1,000 dwellings within the plan area is more likely from a range of sites spread throughout different settlements than it is from fewer sites in Tiverton, for example. This is due to the existence of different markets, where Tiverton is one market that can only sustain so much supply, whereas development in many settlements represents a multitude of markets that can, when taken together, accommodate more demand and thus supply. We do not necessarily advocate any particular distribution but consider that a realistic assessment of the alternatives set out in options 2 and 3 should be undertaken to address the tests of soundness set out in paragraph 182 of the NPPF.

1.9. Paragraph 2.20 – We agree with the sentiment expressed in this paragraph. It is essential that the Local Plan identifies sufficient land so that the market can deliver the housing that is required. To overprovide housing land supply is a much better option than undersupplying. With the latter, an unfortunate consequence can be planning by appeal, as noted.

1.10. Options (Housing) – Option 2 is clearly the only realistic option. Paragraph 158 of the NPPF requires a proportionate evidence base to inform the policy making process.

1.11. Paragraph 2.26 – It is important to acknowledge that housebuilding forms an important economic activity that also assists with recovery from the recession.

1.12. Paragraph 2.30 – We consider that a thorough rethink of policy relating to employment land provision is required following the publication of the Employment Land Review (ELR).

1.13. Options (Employment) - Option 2 is clearly the only realistic option. Paragraph 158 of the NPPF requires a proportionate evidence base to inform the policy making process.

1.14. Options (infrastructure) – Whatever distribution strategy is preferred in later iterations of the Plan, it is essential that there is clarity on what items will be paid for by CIL and what items will be expected to be paid for by s106. Neither option is particularly preferable and the option will be dictated by what is the correct spatial strategy to deliver objectively defined needs, rather than the growth strategy being driven by an ‘infrastructure delivery strategy’.

1.15. Options relating to the Area Centres – We consider that the emphasis should be on meeting objectively defined needs in the most appropriate manner. WE have no particular view on the future direction of growth for any of the Area Centres.

1.16. Paragraph 3.26 – The 2013 ELR recommends that Bourchier Close is retained as an allocation, but makes no comment on Scotts other than noting a desire on the part of the LPA to see it retained.

1.17. Options (Bampton) – Bampton should remain as a focus for limited growth, which is not in conflict with a preference for option 2 in respect of villages. In short neither option is preferred as we consider that Bampton should not be ‘downgraded’ but that villages should be ‘upgraded’.

1.18. Options (Villages) – Option 2 is preferable as expressed above.

1.19. Options (Managing development) – Option 2 is clearly preferable.