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Local Plan Review
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP

13th August 2013

Dear Sir/Madam

Consultation on Mid Devon Local Plan Review Scoping Report

Bell Cornwell LLP are planning consultants who act on behalf of MJ Gleeson, who are developers with interests in Mid Devon district concerning the land at Pedlerspool in Crediton. Our client has asked us to review the Scoping Report and to submit some observations on the issues raised.

General Observations

We have provided a response to the options proposed under various headings and these are set out below. However, from a review of the Report, and from our own knowledge of the issues, it is very clear that the Council is facing considerable obstacles to achieving its objectives and that there is every prospect that these will become still more acute over the coming years. As the adopted Core Strategy makes clear, key objectives for the Council include the delivery of new housing, especially affordable housing, reversing the decline in employment and facilitating the regeneration of key towns. In this regard, we note that:

- Housing delivery is falling short of established targets. Although the Report suggests that the overall average level of shortfall is modest, a review of the Council's Annual Monitoring Reports for the last 5 years reveals that this assumption is heavily skewed as a result of growth during the boom years. The more recent levels are very much more modest. Given that there cannot be any expectation of a return to boom conditions in the foreseeable future, there must be an expectation that delivery rates will remain suppressed. This will have the effect of the overall housing shortfall becoming ever greater. The problems in

this regard are amply demonstrated by the problems being encountered in bringing forward key developments in the District, for example the Tiverton Eastern Extension and sites in Cullompton;

- The delivery of affordable housing is extremely low and well below the identified target. Given that affordability in Mid Devon will remain an ongoing issue, especially with the prospect of continuing in-migration, this is an issue which needs prompt attention;
- The Report acknowledges that employment delivery is also well below intended levels. This in turn is holding back the attainment of wider objectives which seek to reverse patterns of out-commuting, principally to Exeter, in order to help sustain the long term future of Mid Devon's main communities. As well as the economic implications, failure to deliver on this issue is having knock on impacts in terms of environmental quality, lost regeneration opportunities, quality of life and climate change issues.

Many of the objectives established in the Core Strategy are entirely laudable and are supported by our client. However, it is clear that the Council is now in a situation where it faces the failure to deliver most of its key objectives. We would suggest that urgent action is needed to address the situation but with care, this can be done without the need to depart from its overall strategic approach. As the Report itself acknowledges, if this opportunity is not grasped, there is a strong prospect that 'planning by appeal' will become the norm. Given the Government's emphasis on permitting new development, and the experience of other local authorities who are in a similar situation, this would be very likely to undermine the overall spatial approach which has been so carefully developed.



Response on Suggested Options

Distribution of Development

Overall, our client is of a view that Option 1 – retaining the current strategy of focussing most growth towards the major settlements – is the most appropriate as this remains the approach which is most consistent with national policy. However, we suggest that the Council needs to take a 'belt and braces' approach to assessing the role which currently identified sites can play and possibly to identifying new sites. We would also suggest that there is less emphasis on delivery via number of very large sites. This 'eggs in one basket' approach is extremely risky given the inevitable complexity and cost of delivery on such sites and particularly so at time when lenders are reluctant to finance such schemes and where public

sector subsidy can be expected to be nil. In such circumstances, greater emphasis should be placed on more modest and deliverable sites.

Ultimately, it may well be necessary for the Council to identify additional land elsewhere in the District but in the first instance the Council should first review the potential to achieve its goals through maintaining its primary focus on sites in and around the three main towns.

Meeting Housing Needs

Our client's view is that Option 2 – to consider revising its housing policies – should be adopted. The degree of failure in achieving its housing objectives and the prospect that this will only get worse given continuing demographic and economic pressures, means that the Council must be proactive in looking at how to address its housing delivery problems. This can be done in a number of ways:

- Identifying additional sources of realistically deliverable housing supply through, for example, the mechanisms identified above;
- Adopting a more flexible approach towards the delivery of affordable housing. Although at first sight this would suggest that less affordable housing would come forward, such an approach would increase development viability and thus provide for an overall increase in the number of housing sites delivered and thus to affordable housing provision;
- Adopt a more flexible approach to the application of design standards. This does not require a reduction in design quality but rather avoiding the application of rigid standards in design.

Employment Policy

Our client's view is that Option 2 – responding to the findings of the Employment Land Review to reduce overall targets and encourage the development of smaller sites – should be pursued. It is self evident that seeking to enforce a 1:1 relationship between the delivery of jobs and housing does not work especially as there is little evidence that this approach has been successful in other districts where this has been attempted, such as in East Devon. The Council should play to its strengths which, as the Report notes, are the high levels of self employment, of business density, and of business start-ups. This would suggest an increasing emphasis on the provision of employment land for small or smaller businesses. It also suggests the need

to allow much greater flexibility on the provision of housing relative to new employment floor space.

Land Allocations - Crediton

The Report notes that there is less development allocated in Crediton than might otherwise be the case due to the town's topographical constraints. It indicates that consideration should be given to whether the Council's strategy for the town should be amended to seek to identify additional land. The Report proposes two options. Option 1 is to continue with a policy of under provision as before. Option 2 suggests that a review be undertaken with a view to allocating more land, subject to the necessary justification.

Our client is strongly of a view that Option 2 is the most sensible approach and that as part of this process a full re-evaluation be undertaken of the potential which the Pedlerspool site can offer to helping the Council fulfill its objectives for both the town and for the wider District.

There is clearly comprehensive evidence to the effect that the Council's strategy as currently construed is failing to deliver in terms of housing, employment and regeneration objectives. Making Pedlerspool a full rather than contingency allocation is likely to be appropriate for a number of reasons:

1. The housing delivery figures for Mid Devon undoubtedly suggests that there is a growing justification for the land to be brought forward than is currently asserted.
2. The land's suitability as a matter of principle has already been acknowledged through its contingency allocation. This, along with the evidence provided by the current land owners during the previous local plan inquiry, shows that there are no fundamental constraints associated with the site which would prevent the site from being developed. This point was accepted by the Inspector at the local plan inquiry. Pedlerspool cannot therefore be considered to be subject to the physical constraints which led to the Council under providing for development in Crediton in the current Core Strategy.
3. The site is large enough to make a meaningful contribution to new housing and employment land provision.
4. It has previously been shown that the land is capable of providing land for a relocated rugby club and this is reflected in the current contingency allocation. Bringing this land forward could therefore facilitate the relocation of the Club. As well as delivering



housing and employment provision, the Pedlerspool site could therefore help to secure a third key objective – encouraging the regeneration of one of Mid Devon’s key towns.

It is therefore our client’s view that there are multiple reasons which support the view that the potential for Pedlerspool should be reconsidered as a full development site. The development ‘yield’ of the site could also be adjusted according to the Council’s objectives by for example, reducing the amount of employment land or by increasing housing density.

In summary therefore, it is our client’s view that there is now an opportunity for the Council to take action to address a number of key issues which are inhibiting its ability to meet a number of important objectives. We therefore hope that the Council will fully recognize the need for a proactive approach and seize this opportunity and take the necessary steps.

We trust that you will find these observations of use. We would be grateful if you could confirm receipt of this submission.

If you have any queries in the meantime, please do not hesitate to contact us.

Yours faithfully
BELL CORNWELL LLP

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Associate

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Email



