



Mid Devon District Council

Local Plan Review: Scoping Report

**Representation made on behalf of
Messrs Cole, Cottrell & Persey**

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.

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.

1.9. In particular, we commend the land shown on the attached for consideration under option 3. We show a very crude diagram showing the land ownership (all previously submitted in response to the SHLAA call for sites) and how a new settlement could be delivered near Junction 27 of the M5 and Tiverton Parkway Mainline Railway Station. The land is not subject to any protective designation, but adjoins land subject to flood risk to the west. A ‘green buffer’ can be provided to separate the new community from Sampford Peverall, which should retain its own distinct identity. Access from the highway network can be achieved within the land ownership, although further work on impacts on the trunk road network and the wider highways network would be required.

1.10. We draw attention to paragraph 52 of the National Planning Policy Framework, which states that *“the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities”*. One only has to look at neighbouring East Devon to see what can be achieved with positive planning towards a new community at Cranbrook. The land owned by Messrs Cole, Cottrell and Persey provides a similar opportunity for Mid Devon to provide an exemplar new community. WE look forward to

discussing this with the local planning authority in more detail as it works on preparing its Local Plan.

1.11. 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.

1.12. 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.

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

1.14. Options (Villages) – Option 2 is preferable.

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