



## Hallam Land Management

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Our ref

NJD/kn

Your ref

Date

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



Dear Sir/Madam

### **LOCAL PLAN REVIEW OPTIONS CONSULTATION: MID DEVON DISTRICT COUNCIL REPRESENTATIONS SUBMITTED ON BEHALF OF HALLAM LAND MANAGEMENT**

Thank you for the opportunity to comment upon the Mid Devon Local Plan Review Options Consultation. The comments made here are submitted on behalf of Hallam Land Management.

#### **Summary and Overview**

Central to the representations is the support of Hallam Land Management for the proposals at Junction 27/Willand. In this regard Hallam Land Management has agreed Heads of Terms with RABl and the Landowner Consortium representing the majority of the landowners that make up the J27/Willand new community option (Option 2a) in the Mid Devon Plan.

The delivery of the proposals for J27/Willand is therefore backed by the landowners acting with common purpose and by a developer (Hallam Land Management) with direct experience of delivering major strategic proposals in the South West (including new communities) – see below.

Hallam Land Management's representations specifically explain why the long-term growth required within the District is best accommodated through the provision of a new sustainable community identified through option 2a, Land at M5 and adjoining Willand, as set out through policy J27.

#### **Hallam Land Management and Experience relevant to Mid Devon and Junction 27/ Willand/**

Hallam Land Management (HLM) is the strategic land arm of Henry Boot Plc, which has a major presence in the South West including recently delivering the following major schemes in:

- North East Bridgwater – 2,000 dwellings and 110,000 m2 of employment floorspace – commenced October 2010 with 400 new homes now complete or nearing completion;
- Cranbrook new community, east of Exeter. Cranbrook comprises an initial planning permission of 2,900 dwellings within a master plan developed in consultation and which was granted in October 2010. The East Devon Local Plan includes a commitment to expand Cranbrook to at least 6,000 new homes by 2026.

Hallam Land Management Limited

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## **Hallam Land Management**

Working with partners, Taylor Wimpey and Persimmon Homes, Hallam secured a reserved matters consent for 1,100 dwellings just six months following the granting of outline planning permission for the new community in October 2010. A commencement was made on the infrastructure of Cranbrook in 2011 and the first homes were occupied in September 2012.

Today there are some 600 homes that are occupied. Moreover the initial multi-purpose community building and the first Primary school have been completed. The St Martin's Primary School opened in September 2012 coinciding with the occupation of the first homes in Cranbrook.

Detailed reserved matters approvals have been secured for a local neighbourhood centre and for the construction of the Cranbrook Railway station.

Late in 2013 construction commenced on the second phase of infrastructure comprising a further 1.5 kilometres of the principal transport corridor through the site, and the construction of an education campus (including secondary school), to serve the development.

Following extensive consultation, and a collaborative design approach, the Town Centre master plan and design code is in the process of being finalised.

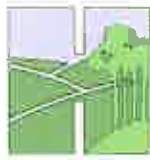
The successful implementation of Cranbrook and achievement of high building rates has been underpinned by the significant progress made by Hallam and its development partners to secure and deliver substantial infrastructure, to include education, energy, transport and community infrastructure at an early stage of the development. Whilst this has involved a substantial investment in partnership working and indeed in infrastructure, Hallam has been committed to this process recognising that the timely provision of such infrastructure underpins the marketability and sustainability to the Cranbrook proposals.

Fundamental to the successful implementation of Cranbrook has been the close partnership working embraced and instigated by Hallam and its partners. In the case of Cranbrook this is enshrined in the East of Exeter Growth Point Board but in all its developments across the South West is central to Hallam's approach. Such partnership working has led to the identification of third party funding resources and mechanisms to bring forward early delivery of particular infrastructure elements.

In the context of Mid Devon, Hallam has close relationships with the County Council – in transportation and education – and with all other key stakeholders in the South west that are key to the development process.

### **Local Plan Review**

These representations provide comment on a number of areas of the Local Plan Review, to include the Development Management Policies, but focuses principally on the amount and distribution of housing proposed within the District over the Plan period in Policy S3 and the need for the plan to deliver the long-term growth required within the District through the provision of the new community identified through option 2a, Land at M5 and adjoining Willand, as set out through policy J27.



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### **Vision and Spatial Strategy**

Mid Devon's Spatial Vision, should by its definition, have a spatial dimension that reflects and underpins the planned growth strategy for the District. Whilst the Strategy states that development will be focused at the three main towns of Tiverton, Cullompton and Crediton, there is no reference within the Vision nor Strategy to support a development focus that encompasses the creation of a new community.

The Local Plan Review confirms there are constraints to the growth of Tiverton, Cullompton and Crediton and as such, appropriately identifies an opportunity to deliver much needed housing and employment land through a large scale strategic allocation in a location that benefits from close connections to the M5 motorway. Development on land east of Junction 27 and adjoining Willand is therefore an integral part of the long-term growth of the district, and as such, central to the delivery of the Vision and Strategy for the District. Additional wording is required within the Spatial Vision and Strategy that references that a new community at Junction 27 and Willand is at the heart of the Plan's Spatial Strategy and Vision for the District. By so doing the Plan provides focus for the implementation of the Plan's strategy and vision.

### **Amount and Distribution of Housing: Policy S3**

At the heart of the NPPF is the requirement for local planning authorities to significantly boost the supply of housing, both market and affordable (para 47 and 50) according to the objectively assessed needs for market and affordable housing in the housing market area.

National Planning Policy Guidance (NPPG) requires Local Planning Authorities to objectively assess and evidence needs for housing and economic development.

Paragraph 2.7 of the Local Plan Review states that the level of housing growth is predicated on the existing annual requirement set out in the Core Strategy, adjusted to take into account any historic under-delivery of housing. This has been calculated from a current required amount of housing "of about 350" per annum, equating to 7000 dwellings over the new Plan period (2013-2033) with an uplift of 20% to take into account population projections, resulting in a interim housing requirement of 8,400 dwellings or 420 dwellings per year.

The Local Plan Review (also at paragraph 2.7) confirms that the final housing figures for the Plan will be amended to accord with the findings of the SHMA, which is not yet published. As such the Plan does not currently meet the objectively assessed needs of the District.

The Council's plan preparation process lacks an up-to date evidence base that, in the first instance, identifies the growth requirements of the District, so that the Council can satisfy itself, and indeed any Local Plan Inspector, that the Plan appropriately accommodates an evidenced level of need. This process is critical to ensuring that the plan-making process results in policies that are positively-prepared, justified, evidenced and consistent with national policy.



The quantum of housing growth for the plan period of 8,400 dwellings, as identified through Policy SD3 is neither justified, evidenced nor consistent with national policy. Furthermore, it is expressed as an approximate figure, which creates uncertainty in the actual level of provision required. To ensure consistency with national policy, the wording should accord with the spirit of the NPPF which is to “boost significantly” the supply of housing, and as such should be expressed as a minimum figure. It should be amended to reflect more recent evidence following the consultation including the SHMA.

It is clear that in addition to the increased housing requirement, a driver behind the Local Plan review is to promote employment growth more generally within the district and through improvements to the delivery of employment land.

However, the term “commercial” has no definition in the NPPF, and could potentially comprise one or a combination uses to include office, retail, storage and distribution. Policy S7 refers to provision of 154,000 square metres of floor space, to comprise a range of employment-generating uses, including B1-B8, A1-A5, D2, C2-C2a and other forms of sustainable employment generating uses.

The term “commercial” should be replaced with “employment”, and the uses referred to in Policy S7, and the reference in policy S3, to ensure clarity in the policy.

### **Option 1 – Town Focus and Option 2 – New Community**

Policy S3 sets out two options to deliver growth over the Plan period 2013-2033. These are Option 1 which seeks to continue with the current strategy of town centred growth, that is focused around the three main towns within the District of Tiverton, Cullompton and Crediton, and Option 2 which adopts a strategy that directs a reduced quantum of growth to the towns and promotes the creation of a new settlement to accommodate the longer-term growth needs of the District.

It is considered that the distribution of growth identified in Option 2 strikes the right balance between directing an appropriate level of growth to the three largest towns within the District, that is Tiverton, Cullompton and Crediton, in respect of their existing scale, form and character, whilst supporting the creation of a new sustainable community to meet the long-term needs of the District.

The Local Plan Review evidences the constraints placed on the long-term growth of the three largest settlements referred to above. In respect of development opportunities at Tiverton, paragraph 2.12 states that the *“long-term options for growth are limited due to surrounding topography, the position of the A361 and flood plains. Development north of the A361 would be divorced from the town and have unacceptable impacts on flood risk, a scheduled ancient monument and the setting of Knightshayes Historic Park and Garden”*.

Paragraph 2.12 then goes onto say, *“the eastern urban extension and smaller allocations around the town are broadly sufficient to provide for the town’s development needs up to 2026, but beyond that the only realistic opportunity for significant development is further to the east”*.



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It is noted, at paragraph 2.13 of the Local Plan Review, that Cullompton has already seen significant housing development in recent years and has a good supply of employment land and whilst recent development has already funded some improvements to junction 28, further contributions would be required before significant further development in Cullompton could be permitted.

It is clear that the Local Plan Review is focused to ensuring improvements to the delivery of employment land, to date compounded by a low up-take of sites. There are large employment allocations at Cullompton (Kingsmill Industrial Estate) that cannot be brought forward until such a time that they are unlocked by improvements to Junction 28 of the M5. Consequently development of any significant scale at Cullompton is constrained by the capacity issues at Junction 28 and therefore is very much dependent on the sourcing of funding to deliver significant highway improvements to unlock further development.

Paragraph 2.14 of the Local Plan Review, considers the growth potential of Crediton, stating that its physical constraints *“limit the options for developable sites and there are existing problems of traffic congestion through the town centre”*.

The Council accept, at paragraph 2.15 that *“later in the plan period, due to land availability and environmental constraints, it becomes problematic to continue a strategy that focuses the majority of development in the three towns according to the current hierarchy of Tiverton-Cullompton-Crediton”*.

HLM agree with the Council in respect of the problematic nature of directing growth towards three towns with a finite resource of appropriately located land, capable of being developed to achieve a sustainable form and scale of development.

The evidence identifies that the growth of the three main town's should be limited to a level that can comfortably be accommodated without putting increased pressure on existing infrastructure, resources and facilities, nor adversely affect the intrinsic form, character and identity of the existing settlement. Hallam Land Management also considers that there are issues arising as to the delivery of the commitments and options for additional capacity in the three towns.

As such, the most sustainable location for larger scale housing is best provided for through the delivery of a new community with close links to the M5 motorway, to accommodate a substantial proportion of the housing needs of the District. This strategic approach to housing delivery allows for effective and co-ordinated planning of housing coupled with delivery of the necessary infrastructure to support the long-term growth needs of the District.

There are clear advantages for advocating a strategic-scale approach to development, which include accelerated rates of delivery, achievement of economies of scale, provision of comprehensive, as opposed to piecemeal infrastructure and increased access to funding streams. Furthermore, paragraph 52 of the NPPF states *“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”*.



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Policy S3 should therefore be reworded so that it provides certainty as to the future scale of growth for the District, in the interests of securing effective infrastructure planning and funding. Policy S3 must demonstrate commitment to secure the appropriate level of growth to meet the District's housing requirement, albeit, currently a figure that cannot yet be determined, due to a lack of an up-to date and evidenced calculation of housing need.

However, there must be a fundamental recognition within policy SD3 for the provision of a minimum of 3,000 new homes (the quantum of residential development identified in the site specific policy J27, in respect of land east of M5 and at Willand) to be delivered as a new community to the east of M5 and at Willand.

It is imperative to instil certainty and confidence regarding the ultimate scale of, and aspiration for, creation of a new sustainable community to secure confidence of potential investors. It is imperative that the Local Plan policies place an unequivocal long term emphasis on a new community, such that there is a clear positive framework which identifies and commits to the planned capacity of the town.

Furthermore, the policy currently restricts delivery of a new community until later in the plan period, that is 2026, or the completion of the 5,460 dwellings elsewhere, whichever is the sooner. Such a restriction places an artificial constraint on the delivery of housing in a location which is entirely sustainable and does not recognise:

- The risk of failure to deliver within the three main towns;
- The lead in times to bring forward the new community;
- The positive signals required to plan effectively and positively for public and private sector infrastructure delivery;
- The need for flexibility to recognise that the new community may be required alongside sites within the three towns to meet need and demand.

Hallam Land Management propose that additional flexibility is provided for in relation to phasing and that the start date is reviewed. Perhaps it would be more appropriate to link the delivery to the need for a comprehensive master plan.

### **Option 2a – Land at M5 Junction 27 and adjoining Willand and Option 2b – East Cullompton Urban Extension**

The Local Plan Review identifies two locations for delivery of a new community. Option 2a proposes a mixed use allocation at Junction 27, known as Land at M5 Junction 27 and adjoining Willand (articulated through policy J27) and Option 2b a mixed use allocation at Junction 28, known as East Cullompton Urban Extension (articulated through policy CU11).

#### **Option 2a analysis - Land at M5 Junction 27 and adjoining Willand**

A Strategic Housing Land Availability Assessment (SHLAA) was published in December 2013 and includes an assessment of Option 2a Junction 27 and Willand, referred to as Site 1, Land East of M5, concluding the site to be suitable, available and achievable for development within the Plan period. Furthermore there are no technical reasons identified that would preclude development of land east of junction 27.



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In summary the SHLAA concludes that the site is located in Flood zone 1, and therefore a sequentially preferable site for development in terms of minimising flood risk, as required by the NPPF. Furthermore, the site is generally level and offers a good development platform with minimal ground re-contouring required. There are no air quality issues. There are areas of visual enclosure within the site. Some 98% of the agricultural land is categorised as Grade 4, and therefore considered to be of relatively low agricultural quality.

The site is therefore largely unconstrained but, moreover, provides a strong opportunity to develop a comprehensive master plan that will result in a high quality and sustainable new community.

The site also enjoys substantial and important benefits including:

- close proximity to Tiverton Parkway Rail Station which is accessible by foot and cycle;
- location on existing bus routes;
- a cycle path linking to the station, Tiverton and Willand and Uffculme, runs through the site;
- the existing road infrastructure and network has available capacity and is capable of being improved (including Junction 29) without impinging on any constraints or raising any technical or landowner issues;
- will be well served by employment to be delivered in an attractive location in market terms;
- is close to Uffculme Secondary School;
- is reasonably close access to Willand's services to include shops, a school, doctor's surgery and a village hall.

Importantly, therefore, much of the key infrastructure elements are already in place. This is a critical benefit of the proposals facilitating, in the manner of Cranbrook, delivery of the new community with appropriate and/or improving levels of infrastructure hand in hand with new homes.

### Option 2b analysis - East Cullompton Urban Extension

Conversely, the SHLAA identifies a number of technical issues in respect of development of land East of Cullompton (SHLAA reference Site 18, East Cullompton) that question the sustainability credentials of the site insofar as it can deliver significant strategic development of a sustainable form.

The SHLAA identifies capacity limitations for Junction 28 of the M5 and traffic implications for the Honiton Road. The junction already operates at capacity at times with queues on the off-slips extending back onto the M5 mainline. This causes serious road safety concerns. The Highways Agency have stated that the site should not be included in the SHLAA until it can be demonstrated that improvements can be delivered to the Strategic Road Network capable of accommodating the traffic flows likely to arise from development, and that an allocation would otherwise be unsound.

The Local Plan Review confirms that recent development has already funded some improvements to junction 28, however further contributions would be required before strategic development in Cullompton could come forward. As such, development at Cullompton is wholly dependant upon securing the necessary funding to undertake junction improvements.



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Furthermore, at least 10% of the site, which include areas primarily through the centre of the site, to the northwest and east, is located within flood zone 2 and 3 which are areas of higher flood risk, the NPPF states that development in areas at risk of flooding should be avoided by directing development away from those areas. There is no evidence that neither a Strategic Flood Risk Assessment, nor a sequential approach has been carried out to support this option.

The SHLAA also reports that there are significant areas within the SHLAA site where there is evidence of prehistoric and Roman activity recorded in the County Historic Environment Record. To the west, recent archaeological work has demonstrated the presence of prehistoric and Roman settlement in and around Cullompton and therefore, there is potential for the allocated site to contain prehistoric and Roman activity.

Part of the western edge of the site is an unclassified wildlife site. The Interim Sustainability Appraisal (SA) dated January 2014, states that the Council are not aware of the presence of protected species or habitats and further site specific evidence will be conducted once the "preferred" options are finalised. The SA reports that this option would result in the loss of 63.2 ha of Grade 1, that is excellent quality agricultural land, 131.2 ha of grade 3 good to moderate quality agricultural land. A significant negative effect, given that Grade 1 agricultural land in Mid Devon amounts to only 3.5% of the District. The SA reports "that given the loss of a significant amount of Grade 1 agricultural land an overall significant negative effect is considered".

The SA also reports that development of the site would have an impact on Cullompton Air Quality Management area which will require some mitigation.

It is clearly evidenced that option 2a benefits from less site specific constraints than option 2b, and as such would result in a more sustainable form of development that could be more readily delivered. Furthermore, option 2a presents an opportunity to deliver commercial development and to secure employment growth, alongside housing growth through a residential allocation to the south, to encompass a mutually reinforcing sustainable new settlement.

### Policy S4 Meeting Housing Needs

Reference has already been made, under Policy S3 that the Plan does not currently meet the objectively assessed needs of the District. Therefore the housing requirement figure in the final version of the Local Plan must reflect the up-to date objectively assessed housing needs (to include market and affordable) of the housing market area, to include the SHMA that is currently being prepared. In any case the requirement should be expressed as a minimum. They will also need to be reviewed in the light of updated evidence including the SHMAA.

### Policy S5 Ensuring Housing Delivery

This policy is supported and represents the pragmatic approach taken by the Council to ensure a constant rolling 5 year supply of deliverable housing land. The policy states that "*if cumulative completions fall below the expected completions total by over two year's worth of the annual target (as expressed in the defined action level for that year), or a five year supply of deliverable housing land cannot be demonstrated, the Council will work proactively to bring forward allocations or outstanding planning consents*".





To rigidly constrain delivery of the new community, as currently demonstrated in the wording of both policy S5 and J27, is therefore contradictory to this policy.

### Policy S7 Employment

Policy S7 refers to provision of 154,000 square metres of floor space, to comprise a range of employment-generating uses, including B1-B8, A1-A5, D2, C2-C2a and other forms of sustainable employment generating uses.

As stated in policy S3, the term “commercial” should be replaced with “employment”, to ensure clarity in the policy.

### Policy J27 - Land at M5 Junction 27 and adjoining Willand.

Hallam supports option 2a of the overarching policy for spatial distribution of growth as set out in Policy S3 and therefore strongly supports the principle of policy J27 as a robust means of accommodating a significant proportion of Mid Devon's growth requirements and the evidence set out above demonstrates the overwhelming performance in sustainability terms of the site at land at M5 Junction 27 and adjoining Willand and in terms of the availability and delivery of the infrastructure necessary to support the new community.

Notwithstanding the in principle support given to this policy, there are a number of elements are not “effective” as they are not flexible, nor deliverable and therefore not “justified”, these are set out below:

- a) 3,000 dwellings with 35% affordable housing to commence after 1st April 2026 or the completion of 5,460 dwellings elsewhere, whichever is the sooner.

Reference has already been made, under Policy S3 and S4 that the Plan does not currently meet the objectively assessed needs of the of the District, as such, the total housing requirement for the District and the proportion of that growth to be accommodated through M5 Junction 27 and adjoining Willand cannot be finalised until such time that the SHMA has been published.

Furthermore, the SHLAA reports that the site can accommodate up to 3,312 units. As such it is considered necessary to provide flexibility within the policy with regard to housing numbers, by expressing quantum as a minimum.

The policy currently restricts delivery of a new community until later in the plan period, that is 2026, or the completion of the 5,460 dwellings elsewhere, whichever is the sooner. Again, comments have been made under Policy S3 state that delivery should not be rigidly constrained by policy but be more flexibly expressed so it can positively respond to meet current needs of the District. A proper approach is to allow the delivery of a strategic housing development, in conjunction with available funding and delivery of necessary off-site infrastructure. As such, any reference that stipulates timescales on delivery should be removed.

For the reasons outlined above, this will ensure consistency with national policy, that the allocation will “boost significantly” the supply of housing.



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- b) 96 hectares for mixed commercial floorspace subject to an impact assessment which demonstrates no adverse impact on town centre vitality and viability. Development might comprise
- 1) 25 hectares for B8 storage and distribution/logistics development
  - 2) 13 hectares outdoor leisure designation
  - 3) 8 hectares for designer retail outlet/village
  - 4) 4.5 hectares Devon produce promotion centre
  - 5) 3.3 hectares for sports and activity centre including associated retail
  - 6) 3 hectares for plant/horticulture centre
  - 7) 2.4 hectares for cinema
  - 8) 1.9 hectares for motorway service area, parking and refuelling services
  - 9) 1.8 hectares for hotel, conference venue and concert hall
  - 10) 0.8 hectares for regional visitor centre

The quantum of defined uses as set out in the policy is too prescriptive. A list of appropriate land uses (without detailed quantum) is adequate and appropriate.

- c) Transport provision to ensure appropriate accessibility for all modes, improvement to Junction 27 of the M5 motorway and provision of a dedicated pedestrian and cycle route to the Tiverton Parkway railway station

The importance of securing appropriately accessible transport modes as an integral part of the delivery of a new community is understood; particularly the principle of securing sustainable modes of transport is supported, however, the policy as stated makes no reference to the existing cycle link through the site that offers access to Tiverton and Tiverton parkway and to Willand. The policy should therefore be clear in its reference to an upgrading of the existing cycle link, as opposed provision of a new and therefore additional link.

- d) A public Masterplanning exercise to be undertaken before any planning application is made.

Whilst a masterplanning exercise, prior to submission of any planning application is supported in principle, flexibility should be built into the policy as to how such an exercise is best carried out as to ensure the most appropriate design outcome. Reference to a "public" exercise should therefore be removed.

Furthermore, flexibility should be built into the policy to ensure that the commercial element and residential elements are capable of coming forward independently of each other, as appropriate and in response to viability, funding streams, provision of necessary infrastructure and market demand. This approach is critical so as to recognise the distinctions between demand and delivery of land for housing and land for employment.



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For the reasons stated above the wording of policy J27 should be amended to the below.

*"Land between M5 Junction 27 and Willand is allocated for mixed commercial and residential development, the two elements of which may be brought forward independently of each other.*

*The development shall provide:*

- a) a minimum of 3,000 dwellings with 35% affordable housing (subject to viability) during the Plan period;*
- b) 96 hectares of mixed commercial floorspace subject to an impact assessment which demonstrates no adverse impact on town centre vitality and viability. Appropriate uses may include:
  - offices, general industry, storage and distribution (B1-B8);*
  - retail, tourism, sports and leisure (A1-A5, D1, D2 and relevant sui generis use);*
  - hotel accommodation (C1); and*
  - and ancillary motorway service use (sui generis)**
- c) transport provision to ensure appropriate accessibility for all modes, improvement to Junction 27 of the M5 motorway and upgrade to the pedestrian and cycle route to the Tiverton Parkway railway station;*
- d) environmental protection and enhancement including strategic green infrastructure which delivers multiple environmental benefits;*
- e) community facilities to meet local needs arising from housing development;*
- f) carbon reduction and air quality improvements;*
- g) an agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development;*
- h) subject to a masterplanning exercise prior to submission of any planning application"*

### **Local Plan Part 3: Development Management Policies**

The Council are also seeking comment on the Development Management Policies. Representations are made on a number of the policies as set out below.

#### **DM2 High quality Design**

Policy DM2 requires major residential development proposals to achieve "green" status under at least 8 of the 12 Building for Life Criteria.

Paragraph 59 of the NPPF states that *"design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally"*.

It is considered that this element of the policy should be deleted to ensure compliance with the NPPF that seeks to prevent overly prescriptive wording within design policies.



### DM3 Sustainable Development

The starting position for policies in relation to sustainable construction are those set out in paragraph 95 of the NPPF. The Code for Sustainable Homes is a requirement over and above that of the national zero carbon requirement. For a local planning authority to depart from national standards should be rare on only on the basis of a full understanding of costs and technical matter which is most unlikely to be available to them. Any additional aspiration for Code level 4 or BREEAM excellent could only be expressed as an aspiration rather than requirement and only then with the benefit of a clear and robust evidence base.

It is however recognised that the Council understand that overly aspirational sustainability objectives can render development unviable.

Notwithstanding the above, the summary analysis of the responses to the 2013 Housing Standards Review into the "Housing Standards Review" (2013) (DCLG) have now been published, the Ministerial Statement, dated 13<sup>th</sup> March, and provides an indication that the requirements of the Code for Sustainable Homes will be consolidated into Building Regulations, and will likely result in the Code being wound down.

As such, reference to the CSH appears inappropriate, paragraphs 2, 3 and 4 should be deleted and replaced with the following wording:

*"Proposals for new development will be expected to demonstrate how sustainable design and construction methods will be incorporated in a way consistently with the Governments zero carbon buildings policy and adopt nationally described standards taking account of viability and/or wider planning considerations and site specific considerations."*

### DM5 Renewable and low carbon energy

Policy DM5 as written, is not consistent with national planning policy as set out in the NPPF. Paragraph 109 seeks to minimise impacts on biodiversity and provide for net gains "where possible", therefore the wording of part d) should be amended to state:

*"Biodiversity (avoiding habitat fragmentation where possible)"*

### DM15 Dwelling Sizes

Policy DM5 as written, is not consistent with national planning policy as set out in the NPPF, nor is justified, in that it is not supported by a robust evidence base.

The summary of Responses to the "Housing Standards Review" (2013) (DCLG) and the accompanying Ministerial Statement refer to a new standard that will offer a consistent set of requirements with regard to the internal area of new homes. It is likely that it will remain optional for local authorities to use, however if authorities do decide to implement the standard, this will need to be justified according to evidenced needs and subject to local plan viability testing. Policy DM15 should therefore be removed.



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### Conclusions

The representations made on behalf of Hallam Land Management, demonstrate that the amount and spatial distribution of development over the Plan period should be delivered through Option 2a, a new community with at Land at M5 Junction 27 and adjoining Willand.

This approach is supported through the technical evidence and the Sustainability Appraisal, conducted through the development of the Local Plan review, as far as it is complete, and confirms the strong, overwhelming, performance in sustainability terms of focusing development at Junction 27 and in terms of the availability and deliverability of infrastructure..

Delivery of a new community will require the establishment arrangements for carrying out development in an effectively co-ordinated and strongly managed programme from start to completion. This will cover all the planning and development processes and projects. This is in effect a role of the "town developer", a model that is adopted in respect of other major developments that Hallam have current experience in implementing – such as at Cranbrook, already referred to in this submission.

Hallam has agreed heads of terms with landowner consortium that covers the J27/Willand Option. There is therefore every prospect of successful delivery of this option. Hallam has demonstrated its ability to deliver new communities in a highly effective manner.

A fundamental characteristic of planning for and delivering a new community is that this is a long term role. Working in close consultation with local planning authorities, the developer will be responsible, through its land controls, for securing the implementation of orderly and high quality development in accordance with a master plan and vision for the development.

The experience of Hallam elsewhere brings a demonstrable capacity for working through strong partnership and in particular an ability to generate funding arrangements within such partnership working to instil confident in delivery rates of both housing and infrastructure.

I trust these comments will be considered in the preparation of the Submission version of the Mid Devon Local Plan. Should you have any questions, please do not hesitate to contact me.

Yours faithfully

*pp K Need*  
Nick Duckworth  
Director