



Ref: AJB/A079200

Date: 21<sup>st</sup> March 2014

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



Dear Sir/Madam,

## MID DEVON DISTRICT COUNCIL LOCAL PLAN REVIEW: OPTIONS CONSULTATION

We write on behalf of our client Persimmon Homes in response to the Mid Devon Local Plan Review: Options Consultation (hereafter referred to as Options Consultation).

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.

### Housing Requirement

The existing Local Plan (Policy COR 3) identifies a housing need over the plan period (2006-2026) of approximately 6,800 units which equates to an average of 340 units per year. The Options Consultation at paragraph 1.18 identifies that Mid Devon's population has grown at a significant rate, by 11% over the previous decade. The document highlights that the number of households is expected to grow from approximately 32,750 in 2011 to 44,000 by 2033.

As a result of these trends the Options Consultation identifies that 8,400 (as outlined in draft Policy S4) dwellings (equivalent to 420 units per year) will be treated as an interim housing requirement for the period 2013-2033. It is stated that this figure is based on an adjustment of the Core Strategy target to take into account of historic under-delivery of housing and increased by 20% to take account of population





projections. It is noted that the Council has recently commissioned a new Strategic Housing Market Assessment (SHMA) in partnership with neighbouring authorities the outcome of which will help inform any necessary revisions to this figure.

Persimmon Homes supports an increase to the housing requirement for the District but considers that the proposed figure must be supported by evidence to show how it meets the full objectively assessed needs for market and affordable housing in accordance with Paragraph 47 of the NPPF and as outlined in the newly published National Planning Practice Guidance. Currently, there is no such evidence available.

### **Amount and distribution of development**

Draft Policy S3 outlines two options. Option 1 is broadly based on a continuation of the existing policy strategy in which the majority of development is concentrated at Tiverton, Cullompton and Crediton. The second option sees a new strategic community created towards the back end of the plan period.

The north west urban extension at Cullompton is an essential element of both of these policy options.

### **Cullompton**

We are therefore pleased that the AL/CU/1 allocation is proposed to be rolled forward as Policy CU1. This allocation represents the most suitable effective means of achieving the short to medium term housing needs 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.

We are pleased that the conclusions of the Employment Land Review 2013 (ELR) have been taken into account and are now reflected in Policy CU1 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.

Persimmon Homes is pleased that the masterplanning process for the site is now well under way with the involvement of all parties with a key interest. This demonstrates the site's availability and deliverability.





However, Persimmon Homes is mindful that considerable delay has been incurred to date in bringing the allocation forward given the pre-requisite to have an over-arching Masterplan in place. Whilst this is clearly preferable, we suggest that the detailed policies for the allocation set out within the Local Plan Review should allow a more flexible means of delivery to enable parts of the site to be cable of being brought forward incrementally, should continued progress on the preparation of a joint Masterplan not be made within a timely manner. 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.

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

We trust these comments will be duly taken into account as the preparation of the Local Plan Review progresses.

Yours faithfully

Simon Collier  
**Director**  
For and on behalf of WYG



