



Ref: AJB/A079200

Date: 24th 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 Summerfield Developments (SW) Ltd in response to the Mid Devon Local Plan Review: Options Consultation (hereafter referred to as Options Consultation).

Summerfield Developments has an interest in the Bouchier Close, Bampton allocated site and an interest in land within the village of Hemyock (which was submitted as part of the SHLAA 2013 call for sites).

With this in mind the principal focus of these representations is on land allocations within Bampton and the Villages. However, comments are also made in relation to a small number of strategic issues.

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.

Summerfield supports an increase to the housing requirement for the District but considers that the proposed figure must be supported by evidence to show that it meets the full objectively assessed needs for market and affordable housing in accordance with Paragraph 47 of the Framework 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 treatment in which the majority of development is concentrated at Tiverton, Cullompton and Crediton. Other settlements would accommodate more limited development which meets local needs. The second option sees a new strategic community created towards the back end of the plan period.

We are pleased to see that both Options 1 and 2 allow for more development in villages as stated in paragraph 2.18. We note that although the Core Strategy pursued a very strong town-centric strategy the average housing completions outside of the towns have been twice the level anticipated. We agree that development in villages enables the provision and improvement of local infrastructure such as schools, roads and affordable housing, benefitting existing residents as well as new ones. This is supported by the NPPF.

We support therefore the proposed strategy to allocate land for housing in villages in order to help maintain their existing levels of services and overall vitality and viability.

If policy Option 1 is to be pursued our client would favour an allocation being reinstated for Bampton. Our client considers that Bampton is of a size and hosts a range of services which distinguish it from other rural areas of the District and accordingly could accommodate a proportion (20-50 units) of the 1,600 figure outlined for Rural areas.

Ensuring housing delivery

We appreciate the motivations behind Draft Policy S5 which outlines the course of action that the Council would take should it find itself in a position where insufficient levels of housing have been delivered relative to the forward trajectory as outlined in this policy.





Our client supports the notion that contingency sites will be given support in order to help boost supply. However, given the requirements of the Framework (Paragraph 49) in such a situation the Council would have to consider residential led applications in the context of the presumption in favour of sustainable development. Whilst the contingency sites may be preferable to the Council it will be important to consider all available options at that point in time.

Villages

Draft Policy S14 identifies Bampton and Hemyock as villages which would be suitable for allocations for small scale housing, employment, tourism and leisure development.

While we are disappointed to see that Bampton has been downgraded in the Council's settlement we agree that its role and function cannot realistically be compared with Tiverton and Cullompton. However, as outlined in our previous representation we consider that the size and level of services available within Bampton is significantly greater than the majority of the larger villages in the District. As such it is certainly suitable for the allocation of housing sites of a scale that would recognise this fact and we would therefore expect this to be reflected in the Council's decisions in respect of which sites it seeks to allocate in future iterations of the Local Plan Review.

We support the identification within draft Policy S14 that Hemyock is a village which would be suitable for allocations for small scale housing, employment, tourism and leisure development. Paragraph 2.65 states that the villages identified in Policy S14 are considered appropriate for a limited level of development based on their physical characteristics and the availability of an educational facility, convenience store and transport service which are identified as essential services. In addition to these essential services, Bampton is also able to offer a church, an estate agent, a heritage centre, a library, a pharmacy and sporting facilities. Hemyock is also able to offer a church, medical facility, public house and sporting facilities.

The draft policy goes onto outline that such development will be limited to proposals within their defined settlement limits and to allocations. We consider that a more flexible approach could be considered which would not limit development based on a line drawn on a map but should be more focussed on delivering sustainable development to meet and support the role and function of the District's many villages. Such an option would be fully in line with the provisions of Paragraph 55 of the NPPF which advocates allowing development in rural areas "*where it will enhance or maintain the vitality of rural communities*" and would still maintain the core focus on the Districts main settlements.





Allocations

The Options Consultation does not provide draft policy wording for allocations within the respective villages on the basis that the exact quantum of development is not as yet fully defined and as a result the Council wishes to retain flexibility in the allocations it ultimately makes. Consequently it merely lists sites that could be considered for allocation within the villages in Table 23.

Table 23: Potential Housing Sites in Rural Areas identifies both of our client's sites (as outlined at the start of this letter) as being potentially suitable for development. It is also noted that our client's site at Bampton is identified within Table 26 as being potentially suitable for commercial development.

The site at Bampton has already been identified (allocated by Policy AL/BA/2) by the Council and the Inspector of the Allocations and Infrastructure Development Plan Document as being both suitable and sustainable. We therefore consider that the allocation for this site should be rolled forward given that the site is still available, is in the control of a developer and is therefore deliverable.

We consider that Hemyock, for the reasons outlined above, can be considered to benefit from strong sustainability characteristics and would therefore be an appropriate location for a housing allocation to be made as part of the Local Plan Review.

The Culmbridge Farm site (SHLAA ref: Site 2), as identified on the enclosed plan, is located a short distance to the east of the village centre and is therefore within easy walking distance of the majority of services that the village has to offer.

The site is completely located within Flood Zone 1 (as identified by the Environment Agency mapping) with residential development being highly compatible with adjacent land uses. Although concerns have been raised (changes in topography) in regard to achieving a suitable access we consider these to be unfounded and could be adequately addressed through a detailed assessment of access options. To this end the SHLAA report considered that an adequate access was achievable.

Summerfield have undertaken preliminary investigations and considers that there are no technical constraints to the delivery of a housing development on the site which is within the control of a house builder and therefore capable of being developed immediately. Compared with the two other sites within the village listed in Table 23, the Summerfield site is more





centrally located and so better located to the villages' facilities. The site is also better related to the existing built form of the village and would be a more natural continuation of residential development within the village. We strongly believe that the site should be identified as a housing allocation within the future iterations of the Local Plan Review.

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

Yours faithfully

A handwritten signature in black ink that reads 'Alex Bullock'.

Alex Bullock
Senior Planner
For and on behalf of WYG



