



**Representation in respect of Mid
Devon District Council's Local
Plan Review Options
Consultation**

Client: Devonshire Homes

March 2014

- 1.1. This brief representation relates to the District Council's Local Plan Review. It is made on behalf of Devonshire Homes in respect of land at Exeter Hill, Tiverton and land at Old Butterleigh Road, Silverton as shown in the Local Plan Review in the appended plan. The sites were both promoted previously through the 2013 Strategic Housing Land Availability Assessment.
- 1.2. Turning to the Local Plan itself, we make comments in plan order.
- 1.3. Introduction – We welcome reference to the need for a revised Strategic Housing Market Assessment (SHMA) and consider it essential that the inter-relationships between the plan area and Taunton and Exeter are adequately assessed in as much as they relate to the strategic housing requirement. It is not clearly set out what neighbouring local planning authorities will be co-operated with on this issue, but we consider it essential that this crucial part of the evidence base informing formulation of future planning policy takes this into account. We draw attention to the tests of soundness in paragraph 182 of the NPPF, particularly in relation to being 'effective'. In addition, The National Planning Practice Guidance is clear that *"local planning authorities should work with all the other constituent authorities under the duty to co-operate"*.
- 1.4. Paragraph 1.18 – We highlight the importance of meeting the objectively defined needs as required by paragraph 47 of the National Planning Policy Framework. Reference is made to the high levels of population growth in the period between 2001 and 2011 in comparison to the wider region, county or England. The desirability for the area in respect of in-migrants, usually from the south east of England, is a key driver of growth and the SHMA and, by inference, the strategic housing requirement should take this into account in assessing need. Failing to meet these needs will only affect affordability and affect those unable to compete in the open market the most. This paragraph also notes that the number of households is forecast to grow by 11,250 in between 2011 and 2033. It is imperative that the Local Plan Review adequately addresses this need and provides the land to deliver the necessary growth.

- 1.5. We draw attention to a recent RTPI Research Report¹ which stated that “*it seems likely that the 2011 census results – and so official household projections by DCLG for England – were influenced by both the economic downturn and the effects of a long period of poor housing affordability. In turn, this suggests that planning on the basis of these projections could lead to an under provision of housing in some areas. In the light of this, should planners assume that household size will remain stable or resume, at least in part, the previous, falling trend? For some authorities that choice could affect the number of homes required by 30% or more*”. It is essential that trend based data is used appropriately in planning for the plan period.
- 1.6. Paragraph 1.22 – We support the recognition of the link between “*chronic under supply of housing to meet the needs of a growing population*” and house price inflation. The recognition is expanded upon in table 6 and we consider that this should be one of the key drivers behind the Local Plan Review seeking to meet existing and future housing needs.
- 1.7. Paragraph 1.23 – This highlights the mismatch between the need for affordable dwellings and the means of delivering. We highlight reference in paragraph 47 of the NPPF to local planning authorities meeting “*the full objectively defined needs for market and affordable housing*”. We support the recognition therefore of a slightly increased strategic housing requirement of 8,400, but acknowledge that this may change with the production of the SHMA. We note reference to the Exeter Housing market Area, but highlight, as above, the importance of inter-dependencies with Taunton to the north of the plan area.
- 1.8. Vision and Spatial Strategy – We support reference to locations which are or can be made sustainable and the consequent recognition of the villages in the plan area being appropriate locations for limited development.

¹ Planning for housing in England: Understanding recent changes in household formation rates and their implications for planning for housing In England. (January 2014)

1.9. Policy S1 - We support reference to taking a positive approach in favour of sustainable development.

1.10. Policy S2 – We support the focus on Tiverton, Crediton and Cullompton and also applaud the change in emphasis to allow needs in rural areas to be met. The planning system has acted as a brake on meeting rural housing needs, which includes market housing as well as affordable units, for much too long to the detriment of many who have been forced to move to the nearest town given rising house prices and lack of supply in rural areas. This policy of rural restraint has been of limited benefit and has laboured under a simplistic understanding of sustainability, i.e. relating it to use of the private car, in order to distribute housing to meet needs. We highlight paragraph 54 of the NPPF in this regard.

1.11. Paragraph 2.7 – We support the acknowledgement of the historic under delivery of housing and the opportunity this represents to the Local Plan Review to make up this shortfall to meet the objectively defined needs for the plan area. We support reference to an ‘over-allocation’ of land to ensure that the defined need in the SHMA is met. This accords with paragraph 47 of the NPPF’s reference to *“choice and competition in the market for land”*. This is the best means of ensuring that needs are met. The NPPG notes that household *“formation rates may have been suppressed historically by undersupply and worsening affordability of housing”* and that *“the assessment (of housing needs) will therefore need to reflect the consequences of past under delivery of housing”*.

1.12. Paragraph 2.8 – We do not support the ‘either/or’ statement put forward in this supporting text. This text may be correct, but there is no reason for this iteration of policy to rule out a strategy that incorporates growth at the three main towns, a new settlement along with growth in the villages.

- 1.13. Policy S3 – We accept that the 8,400 figure is a provisional one. However, we consider reference should be made to ‘at least’, rather than ‘approximately’, whatever the final figure is.
- 1.14. Policy S4 – we welcome reference to the dependency of delivery on viability.
- 1.15. Paragraph 2.20 – it is important to clarify the NPPF reference includes meeting the full needs in respect of both market and affordable housing. The same comment applies to paragraph 2.22. It will be helpful to clarify what other local planning authorities will be jointly working on the SHMA.
- 1.16. Policy S5 – This policy is pointless and should be removed. It replaces a similarly worded policy in the Allocations and Infrastructure DPD (AL/DE/1) and it is unclear if this policy has been engaged. The levels of delivery have to fall to such stupendously low rates for it be engaged that it is unlikely to be required. The thought and consideration that has gone into it is to be applauded, but we question its utility. Text within the policy refers to the need to demonstrate a five year supply of land, which is a more relevant trigger point for action, rather than what is contained within this policy. It also refers to ‘contingency sites’. We question whether identification of such sites will have any part to play in meeting the housing needs in the short to medium term if other sites are not delivering. We do not consider that they will be able to react to such instances to be of any assistance. Instead, we support the reference to an over-allocation to ensure that targets are met. We support the deliberation that has gone into the policy, but consider that it could be wasted energy.
- 1.17. Paragraph 2.26 – The Core Strategy housing requirement has not been met since 2007-2008 and we consider that this represents historic and persistent under delivery that necessitates reference to a 20% buffer. It is better this than seeking to undershoot housing delivery in the plan period. The supporting text also refers to ‘proactive development

management'. The sentiment behind this is to be applauded, but at present, this is set out in words only. If it is to mean anything, this should be set out. Reference is made to releasing contingency sites, but, as noted above, we question the impact these sites will be able to make. We welcome reference to an early review of the Local Plan if monitoring indicates that this is necessary. This reflects guidance in the National Planning Practice Guidance.

- 1.18. Policy S6 – We query whether there should be a standard requirement for on-site public open space provision where an assessment of existing provision and deficiencies has not been undertaken. Provision of new open space should relate to need and the assessment of existing provision and deficiencies.
- 1.19. Policy S7 – We support the wider definition of employment as set out in this policy text, as also set out in paragraph 2.30.
- 1.20. Paragraph 2.40 - The National Planning Practice Guidance states that *“where the levy is in place for an area, charging authorities should work proactively with developers to ensure they are clear about the authorities’ infrastructure needs and what developers will be expected to pay for through which route. There should be not actual or perceived ‘double dipping’ with developers paying twice for the same item of infrastructure”*. The published Regulation 123 list clearly sets out what will be funded through CIL. This should set out clearly in supporting text.
- 1.21. Policy S11 – We support the focus of growth on the main towns as a matter of principle as part of an overall spatial strategy that seeks to meet needs in all parts of the plan area.
- 1.22. Policy S14 – we support the identification of villages in rural areas as appropriate locations for some limited housing growth. In this instance we support the identification of Silverton.
- 1.23. Tiverton Housing Consultation sites – Given Policy S3 identifies the need for a small amount of deliverable sites to be identified in Tiverton for

the plan period, we consider that deliverable sites, such as TIV13 should take priority over other less suitable sites. TIV7, TIV11 and TIV15 should be deleted from the Local Plan Review as not being deliverable. We consider that the area set out in TIV2 is not required within this plan period and should be reduced to reflect needs. Flood issues affect TIV4 and this site has not come forward despite being allocated in the adopted Local Plan. It is unnecessary to allocate TIV8 and TIV9 which can both come forward to be assessed against development management policies as windfalls. As noted above, the concept of contingency sites is a flawed one. The identified site at Tidcombe Hall is heavily constrained and will not be able to be brought forward to assist with any shortfall in a meaningful way. This site should be deleted from the plan. We support identification of TIV12. Whilst we acknowledge the landscape issues surrounding proposed development of TIV13, the site is a deliverable and we note the highways comments in the 2013 SHLAA concerning capacity bearing in mind named access points.

1.24. In respect of the land at Silverton we draw attention to the attached letter from Savills dated 25 May 2011 made in respect of LP3. This refers to the appeal decision relating to the land at Old Butterleigh Road under the headings Planning History and Planning Considerations. The letter clarifies that there is no technical impediment to delivery of this site, by reference to the appeal decision, and that the only reason the Inspector relied upon was the fact that the site is located outside the settlement limit relevant at that time. We contend that this provides a significant level of comfort for the site to be allocated to meet a limited amount of growth for Silverton in accordance with Policy S14.

25 May 2011

Liz Pickering
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP



Neal Jilings BSc(Hons) MA MRTPI

The Forum
Barnfield Road
Exeter EX1 1QR

Dear Liz

Development Management DPD consultation

Introduction

We act on behalf of Devonshire Homes and have been instructed to make representations in respect of the above document. In general, the document has been published at an unfortunate time in terms of the status of national planning policy and many questions relate to the scope of policy within the DPD bearing in mind national policy, the precise scope of which is currently uncertain. The Local Planning Authority is in an unenviable position, but we consider is correct in not holding up publication of this iteration of the DPD. The scope of the national Planning Policy Framework will become clear before adoption and any changes thought necessary can be made at that time.

Any answer to the many questions concerning the issue of overlap with national policy must be subject to the caveat that the contents of local policy will be dependant on the contents of national policy. What must not be allowed to happen is that there is a policy vacuum, where any issue is not adequately addressed by either level of policy. Having said this, this particular representation relates to a site in Silvertown and a separate representation relates to broader comments on the document. The thrust of this particular representation is that;

- We support the view that, in principle, the settlement limits for the 21 defined villages in Mid Devon should be reviewed.
- We consider that the underlying rationale for such a review should be to allow some limited growth to occur within the confines of Core Strategy policy COR17
- We consider that the site shown on the attached is suitable for a limited development of market and affordable dwellings

Site Description

The subject site is shown on the plan attached to this brief letter. It forms a parcel of land located between two properties situated on the eastern side of Old Butterleigh Road, Silvertown. Originally there were glasshouses on the site as it was used as a commercial nursery but there are no longer any structures present.

It is screened to the Old Butterleigh Road by an earth bank upon which sits a hedgerow of limited height. Indeed the topography of the land and position of the site is such that the hedgerow is only in existence along the southern "half" of the boundary fronting Old Butterleigh Road. The remaining boundaries are formed by hedgerows interspersed with trees of varying size and maturity. A drainage channel runs down part of the

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eastern boundary of the site. It is below ground level at the northern end of the site but rises to ground level at the eastern boundary. A single point of vehicular access sits at the southern end of the site.

Beyond the site to the east is open land formed by a mixture of garden land and allotments while to the west, beyond Old Butterleigh Road, are allotments and open fields situated on rising land. To the north and south are two existing residential properties, nos. 5 and 4 respectively which form part of a row of properties that sit on the eastern side of Old Butterleigh Road extending north from the centre of the village. There are further properties to the north of the property that sits adjacent to the northern boundary of the site that extend for some distance along Old Butterleigh Road

Planning Policy and other guidance

As is the norm, existing and previous planning policy defines a settlement hierarchy and then provides for a specific policy approach to settlements defined in a particular category. The adopted Local Plan (2006) defined Silverton as a 'village for limited development' under policy S3 where development was limited to small scale proposals within the defined settlement limit. The adopted inset map attached shows the tightly defined settlement limit with the subject site located adjacent to this limit. The relevant Core Strategy policy, which has replaced S3 of the Local Plan, is COR 17 relating to 21 defined villages, one of which is Silverton. This is reproduced in full below.

"The following rural settlements with some local facilities and employment and access to public transport will be designated as villages: Bow, Bradninch, Burlascombe, Chawleigh, Cheriton Bishop, Cheriton Fitzpaine, Coplestone, Culmstock, Halberton, Hemyock, Kentisbeare, Lapford, Morchard Bishop, Newton St Cyres, Sampford Peverell, Sandford, Silverton, Thorverton, Uffculme, Willand and Yeoford.

Development will be limited to minor proposals within their defined settlement limits and to allocations for:

*a affordable housing meeting a local need;
b small scale employment and tourism;
c services and facilities serving the locality; and
d other very limited development which enhances community vitality or meets a local social or economic need."*

Development on this site is currently limited, in accordance with existing development plan policy, to that defined under Policy COR18 of the adopted Core Strategy. This representation considers that the site is suitable for a minor amount of residential development within a refined settlement limit, which would be in accordance with Core Strategy policy COR17.

The District Council undertook a survey of 'Rural Services in Mid Devon' in 2010. This related to the 21 villages defined under policy COR17. Silverton was found to have the following;

- Doctor;
- Mobile Library;
- Primary School;
- Shop;
- Pub;
- Hall;
- Post Office; and
- A daily bus service.

In support of our view that Silverton should attract a small amount of existing growth beyond the existing settlement limit, we draw attention to some extracts from the report to the Government by Matthew Taylor MP entitled "Living Working Countryside: The Taylor Review of Rural Economy and affordable Housing". It was commissioned by the previous administration and published in 2008, but its findings remain pertinent.

The introduction to the report states that *"this country's rural communities cannot stand still. Change is inevitable whether development takes place or not, and the choices we make today will shape tomorrow's character of the market town's, villages and hamlets that make up our countryside"*¹. The introduction also makes reference to the previous policy approach of 'protecting' (his emphasis) villages from development and the unfortunate, and unintended, consequences of this policy approach; the loss of services and facilities, increased affordability problems etc.

Chapter 3 is entitled "Living Working Villages". Paragraph 1 refers to an *"overly narrow interpretation of policies designed to protect the countryside which mistakenly (my emphasis) brands small settlements as 'unsustainable' (his emphasis)"*. One of the housing challenges facing villages is identified as a *"restrictive planning regimes and shortfall of planned provision of new homes creating an especially constrained supply of both (my emphasis) market and affordable homes"*².

Paragraph 38 states that *"as Local Planning Authorities prepare their Core Strategies and Development Plan Documents, they should be considering sites in and around villages where appropriate (reflecting local needs, and the importance of maintaining and improving environmental, economic and social sustainability) for schemes that will provide a mix of private and affordable housing"*.

Paragraph 42 states that *"simply ruling out whole categories of villages as unsustainable, as too many local plans currently do, ignores the potential for enhancing the sustainability of many smaller rural communities, and the real needs of those who live and work there. The process of allocating sites for mixed development should be implemented in a wider range of communities than is typical today"*.

The approach put forward in this brief report of allowing some market housing in certain villages, in this case Silverton, is backed up by the recognition that *"the scale and pace of increased house prices over recent years has created severe housing need among working people on average incomes, not just those traditionally needing social housing"*³. This is part of a wider view that housing need encompasses all forms of housing, i.e. open market housing for those who can afford market prices need to be catered for, as do those who require social rented and intermediate housing.

Planning History

A planning application Council Ref: 4/45/91/1143 submitted to the Council in 1991. This application, submitted in outline form only, was for residential development. It was refused and dismissed at appeal.

A further planning application for *"Erection of 6 bungalows together with new vehicular access"* was registered on 15th December 2009. It was then refused, under delegated powers, by the Council on 8th February 2010. A copy of the decision notice (Council Ref. 09/01762/FULL) is attached. The decision had five reasons for refusal relating to the following issues;

1. Location outside the settlement limit;
2. Highway safety;
3. Impact upon trees and hedges;
4. Impact on protected species; and
5. Surface water drainage.

A subsequent appeal was submitted by Devonshire Homes (Appeal Ref: APP/Y1138/A/10/2124263/NWF) against Mid Devon District Council's decision to refuse a full planning application.

The Inspector's decision letter is dated 03 August 2010 and deals with each issue in turn. Part of the appellant's case was that, whilst outside the defined settlement limit, the site is previously developed and can be considered as infill as it falls between existing development to the north and south of the site. This

¹ Para. 1 - Introduction

² Para. 3 - ch. 3

³ Para. 46 - ch. 3

argument was not accepted by the Inspector, who, in short, concluded that the site fell outside of the settlement limit and that policy relating to this issue is very clear.

In relation to highway safety, the Inspector concluded that *"the close proximity of local facilities and public transport would in my view be likely to encourage future residents to walk, rather than drive, into the village centre"*. In addition, she concluded that it *"seems fair to assume that the residents of the dwellings to the north of the appeal site have been walking to and from the village, past the appeal site, without mishap"*. In conclusion the Inspector stated that *"it seems to me that given the relatively low use of this quiet road, this small increase in pedestrian traffic would not be so significant as to materially increase the risk of conflict with other road users"* and *"that the proposed development would satisfy the aims of Policies TR2, TR5 and TR10 of the Devon County Structure Plan 2001 to 2016"*.

In relation to trees and hedges the Inspector concluded that *"the proposed development would not conflict with any Development Plan policy"*.

The Inspector noted within her decision that the Council, at the hearing, withdrew its refusal reasons relating to protected species and surface water drainage.

Planning Considerations

As noted by the Local Planning Authority's own evidence base, Tiverton is a village with a good level of facilities. The village has, in the past, grown organically and the imposition of planning policy, most recently through the Core Strategy, particularly policy COR17, is an artificial limit to what has occurred before. There are many reasons why the division between settlements much beloved by planning policy is overly simplistic, but we have to acknowledge the existence of adopted Core Strategy policy which dictates the scope of policy within the Development Management DPD. We believe that the current consultation and adopted Core Strategy Policy COR17 offers scope for a limited amount of growth at village locations.

In relation to the site shown on the attached plan and the five reasons for refusal in the recent decision, the Council withdrew reasons 4 and 5 and the Inspector concluded that reasons 2 and 3 were not of sufficient strength or relevance to warrant a refusal. The sole reason for the Inspector's decision to dismiss the appeal was a statement of fact that the site, at that point in time, was located outside a defined settlement limit, which was subject to an adopted development plan policy that restricts acceptable development.

In conclusion to the other four refusal reasons, which related to 'technical matters' the Inspector saw no cause for concern. If, therefore, the Local Planning Authority accept our overall argument that, as a matter of principle, some limited growth should occur in villages, there is every reason to conclude that the subject site is the most appropriate site as there are no technical difficulties that would hinder development of the site for a minor amount of residential development that would aid the villages existing good level of services and facilities.

All things being equal, if the settlement limit was redrawn to encompass the subject site, there would be no reason to refuse the application. Lack of technical constraints is not, in itself, a reason to allocate a site for development. However, if it is accepted that the settlement limits should be reviewed, which the Development Management DPD clearly alludes as being a realistic option, a site with no technical constraints should clearly be thought of as providing a suitable location for any limited growth allowed by an amended settlement limit.

Tiverton is a settlement with a good level of facilities, as defined with the local planning authority's evidence base. Growth should occur, in our view, at a commensurate scale to the scale of the settlement. The proposed Tiverton urban extension to the east of the town is, in our view, no more sustainable than the limited controlled growth of the main villages, including Tiverton, which have a good level of facilities and services.

Whilst it is an obvious point that most growth should go to the larger settlements of Tiverton, Cullompton, Crediton and Bampton, there is no 'cut off point' whereby growth in other settlements suddenly becomes

'unsustainable'. Managing growth should be slightly more refined than defining four settlements as 'sustainable' and then defining everywhere else as unsustainable and putting unreasonable limits on limited growth.

In our view the settlement limit for Silverton should be extended to allow the sensitive small scale development of the site shown on the attached plan.

Conclusion

In response to the relevant text within the draft DPD, from page 34 to 36, we make the following comments and conclusions;

Paragraph 5.9 – As above, we see no need to stress that the level of development for the defined villages is 'very limited' as if development is something to be avoided at all costs. We accept that COR17 does limit development, but we have attended meeting with officers of the local planning authority where there is a clearly defined change in emphasis and mind set from 'development control' to 'development management'. This text hints at remnants of the former and we would hope that the local planning authority can see the benefits of providing for limited growth within and adjoining the 21 defined villages. One particular benefit is clearly delivery of affordable housing and, with a lack of housing grant, this can only be provided through cross subsidy. The nettle of allowing some market housing (which, in itself, is meeting a need in villages in Mid Devon) should be grasped with a view to also providing affordable housing in accordance with existing LDF policy.

Paragraph 5.11 – We concur that the DPD cannot allocate large extensions to the existing settlement limits, but consider that minor alterations can deliver benefits within the confines of existing LDF policy.

Paragraph 5.12 – We welcome the DPD's acknowledgement that 'more sustainable patterns of development' can be promoted by focussing development 'In, or next to, existing towns and villages'.

Paragraph 5.13 – We support the view that the 21 defined villages should be "*considered suitable for limited development because they have a good level of services*".

Paragraph 5.14 – We note the DPD's assertion 'de-linking' housing development and service provision. The corollary of this line of thinking appears to be that recent housing development has had no discernible positive affect in terms of service provision. In our view the loss of services in villages has had more to do with wider restructuring and attitudes prevalent in society over the last 30 years rather than there being no link between the two. We do not accept the assertion that further housing will necessarily have no positive impact of retention of services in villages, as the local planning authority seems to be relying on in being overly restrictive.

We welcome the fact that settlement limits should be reviewed but would welcome clarification on the impact that the 'broader principles of localism in mind' statement will have on this process. We think we know what this means, but it should be clarified.

Options – The DPD offers two options in respect of 'settlement limits'; one option proposes to leave the settlement limits unchanged and the other proposes minor adjustments to recognise new development, existing land ownerships or to potentially be more restrictive by being defined more tightly. In our opinion, there is a glaring omission here in that an option proposing an extension of the settlement limits in the 21 villages to allow limited residential development should be included. Paragraph 4.38 of PPS12 states the following in relation to assessing reasonable alternative;

"The ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others to ensure that they bring forward those alternatives which they consider the LPA should evaluate as part of the plan-making process. There is no point in inventing alternatives if they are not realistic. Being able to demonstrate that the plan is the most



appropriate having gone through an objective process of assessing alternatives will pay dividends in terms of an easier passage for the plan through the examination process. It will assist in the process of evaluating the claims of those who wish to oppose the strategy."

In our view, the DPD should propose the limited review of the settlement limits to allow some development as a reasonable alternative option. The text found in paragraph 5.13 on the preceding page is contradicted by the overly restrictive options put forward in the DPD.

As noted above, the DPD must be in accordance with the Core Strategy. We consider that a limited adjustment of settlement limits, such as the one proposed at Old Butterleigh Road, Silverton, can secure much needed affordable housing and would be addressed by adopted Policy COR17. Whilst we accept that exceptions sites for affordable housing are dealt with under Policy COR18, we consider that some form of cross subsidy scheme is essential to ensure delivery of affordable housing. This is especially the case where there is a lack of grant. The site identified in the attached is an ideal candidate to provide a limited amount of development (both market and affordable) to allow the continuing organic growth of Silverton and we look forward to working with the Local Planning Authority on this and other matters set out in the draft DPD up to adoption.

In response to the detailed questions therefore;

- a. Yes, in our opinion, the settlement limits for the defined villages, including Silverton, should be thoroughly reviewed and we believe that the above makes a good case in support of the principle of changing the settlement limit and the detail of changing Silverton's settlement limit to encompass the land shown on the attached.
- b. We consider that settlement limits should be changed to allow limited residential, and other, forms of development to allow the defined villages to grow within environmental limits. We consider that the site shown on the attached is the most suitable site to allow a small amount of development at Silverton. In matters of planning judgement, the recent refusal and appeal decision confirms that there are no planning reasons stopping acceptable development of the site apart from that relating to the settlement limit. If the principle of amending the settlement limits is accepted, then the subject site should be included within the defined settlement limit for Silverton as there is then planning impediment to some small scale residential development delivering both affordable and market housing, both of which fulfil a need in the rural areas.

Yours sincerely

Neal Jillings BSc(Hons) MA MRTPI
Associate