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Local Plan Review Consultation
Forward Planning
Mid Devon District Council
Phoenix House
Tiverton
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Dear Sir/Madam,

LOCAL PLAN REVIEW – OPTIONS CONSULTATION

We write on behalf of our client, Waddeton Park Ltd, who have property interests in Mid Devon District. We set out representations on our client's behalf in response to Mid Devon District Council's *Local Plan Review – Options Consultation* (January 2014).

Amount and Distribution of Development – Policy S3

Policy S3 proposes the provision of 8,400 dwellings and 154,000 square metres of commercial floor space between 1st April 2013 and 31st March 2033. A *Strategic Market Housing Assessment* (SHMA) is currently being prepared and we welcome this. Although ideally it would have been better to wait for the findings of this exercise before commencing consultation on the current review as a more sequential approach would have avoided any abortive work. Having said this, the quantum proposed by the Council does appear reasonable, given the information available in the sustainability appraisal and from our analysis of the latest household projections (albeit we reserve the right to comment in detail at a later stage of the plan process, once the SHMA evidence is available).

Policy S3 identifies two possible options for delivering the quantum of development suggested:

- Option 1 – Town Focus (i.e. Cullompton, Tiverton and Crediton)
- Option 2 – A New Community

Mid Devon is largely rural in character and whilst it falls within the sphere of influence of both Exeter and Taunton it does not of itself directly need to provide any housing to meet their needs.

We believe that development should be focussed at the main towns within the district as this is the most sustainable option. Development in and adjacent to the main towns is the most sustainable way of providing for both housing and economic growth as the main towns provide the greatest level of services and facilities and the greatest opportunity for both existing employment provision and attracting new businesses. This urban concentration strategy ensures that distances between houses, services and jobs are shorter, which reduces reliance on the car and allows those without a car access to services and employment.

Option 1 strongly accords with the Core Planning Principles set out in the National Planning Policy Framework (referred to as 'The Framework' from here on). Specifically, the importance of focussing housing development in locations accessible to the main centres with economic growth potential. This both reduces overall travel needs and maximises the scope for the fullest use of public transport, walking and cycling. The larger settlements in the district offer the greatest potential to achieve this, due to their greater size and the economies of scale that this offers in terms of offering employment and services in the same settlements. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. It therefore follows that the strategic option with the best sustainability credentials must surely be the preferred option.

It is for these reasons that our clients strongly support Option 1.

Whilst Option 2 (New Community) may seem attractive to some, largely as it would divert development away from other towns, it is not a realistic option as in order to be self sustaining a new community would need to comprise at least 5,000 houses, a far greater number than that currently proposed.

A new community would require a massive upfront investment in new infrastructure, facilities and core services and this would have a negative impact on the future investment in towns and villages. Such massive infrastructure investment would require Government support, which may or may not be forthcoming.

Comparison with the new communities in the south west at Sherford and Cranbrook are, in our view, not relative to Mid Devon. Those two new communities are related to the strategic economic scale and growth potential of Plymouth and Exeter respectively, building on that economic base. This is deliberate and ensures that the need to travel is minimised and public transport is an attractive choice between the new settlement and its companion City. The situation is very different in a rural area like Mid Devon. It is also important to consider the experience in terms of delivery of Cranbrook and Sherford. These new communities have had significant lead in times, taking in excess of 15 years from first being considered to planning permission being granted, let alone construction. With a plan period looking ahead to 2033, the main focus for development must therefore continue to be in the three main towns of Cullompton, Tiverton and Crediton (S3 Option1).

The economic growth potential provided for in the current plan at Tiverton, Cullompton and Crediton would undoubtedly be prejudiced by the need to promote a new community, another negative impact of Option 2. In sequential terms a new community is the least sustainable option, a matter that will be explored in more detail in the following section of these representations.

Sustainability Credentials - Policy S3 Option 1 vs. Option 2

The Local Plan Review is accompanied by an *Interim Sustainability Appraisal (SA)*. The SA sets out a framework of indicators used to understand sustainability effects of the policies and allocations contained within the plan. The SA includes the following framework:

- The protection of the natural environment
- The protection and promotion of the built environment

- Mitigating climate change
- Resource use
- Economic growth
- Supporting retail
- Meeting housing needs
- Health and wellbeing
- The infrastructure provision

A score ranging from +3 to -3 identifies the scale of impact in sustainability terms. With +3 being the most significant contribution and -3 the most negative. This scoring system allows the sustainability credentials of different policies to be compared. The following scores are a particular relevance to the overarching strategy of Policy S3:

- Option 1 Town Focus – this scores +14 when compared against the SA indicators
- Option 2 New community – this scores +9 when assessed against the SA framework indicators

It can therefore be deduced that the Option 1 town focus has the greatest positive sustainability benefits and therefore it must be the most sustainable strategic approach. Whilst a new community may well be required at some stage in the future, we believe it would be premature to allocate such a site at this time. Other more sustainable options should be utilised before resorting to a new community. If a new community is needed it will be after the current plan period i.e. post 2033, as current needs can be met through other available sites which represent a more sustainable solution. Any new community post 2033 would need to form part of a wider development strategy for the sub region and, if progressed, address the wider development needs of that area having regard to the ongoing development planned elsewhere.

Tiverton

As has been set out we strongly support the Option 1 town focus. Based on the town focus Policy S11 seeks to identify the housing requirement for Tiverton over the plan period. There is an annual need identified for 117 open market units and 63 affordable units, this equating to 3,600 dwellings for the town over the plan period. Whilst we support this level of provision we do reserve the right to comment in more detail at a later stage of the plan preparation process, once evidence of need becomes clearer. Once currently allocated sites with planning permission are excluded this leaves a net requirement of 3,291 dwellings.

The Local Plan Review identifies a number of potential housing sites in Tiverton, these totalling 3,361 dwellings (slightly in excess of the net requirement). So, on the face of it, it would appear that all of the options identified within the town need to be allocated in order to deliver the net requirement.

We strongly support the retention of the Eastern Urban Extension (TIV1), as it represents a sustainable and effective means of delivering the long term housing needs of the town. Our clients are part of a consortium that is in the process of preparing a masterplan for the urban extension. The consortium is working in partnership with Mid Devon District Council, Devon County Council, statutory bodies and key local stakeholders with the intention of having an adopted masterplan in place during 2014. Given this there can be no question regarding the commitment to deliver the urban extension in a timely fashion.

In reality there is no guarantee that all of the sites identified in the local plan review options consultation will be delivered, nor any guarantee that they will deliver the quantum of development envisaged (some may be less and some more) as was the case with many of the sites allocated in the Site Allocations DPD. Given this there is the need for a more flexible approach towards the housing numbers set out for each of the potential allocated sites in Tiverton, particularly as some may be able to satisfactorily deliver more housing than initially thought. An easy way to allow for this eventuality would be to make all of the allocations on an

'at least x number of dwellings' basis rather than set an upper limit. We believe that Hartnoll Farm (Policy TIV2) is a good example of a site that could accommodate more than the 1,100 houses currently suggested.

Hartnoll Farm (Policy TIV2)

Policy TIV2 proposes an allocation of 1,100 houses at Hartnoll Farm. Hartnoll Farm reads as a natural extension to the Eastern Urban Extension.

The proposed site is located approximately 1.2km to the east of Tiverton and 400m to the west of Halberton. The site comprises a parcel of agricultural fields of varying sizes in both arable cultivation and pasture, separated by hedged field boundaries, of which many are hedge banks. The site is located on gently undulating ground which generally rises from south to north and west to east. The site surrounds the Hartnoll Farm Industrial Estate, which lies south of the road from Tiverton to Halberton. The site is bounded by the Grand Western Canal to the east and south, and by minor roads to the north and west. Beyond the site the land is largely of agricultural character, aside from the industrial estate, and a golf course located to the north.

We contend that Hartnoll Farm is able to accommodate a greater quantum of development. The SHLAA identified the potential for 1,462 dwellings on site. The precise number of units should be derived through a detailed masterplan process, with more than 1,100 units not ruled put at this stage. We recommend that the Policy TIV2 wording be revised to read "...At least 1,100 dwellings..." to introduce a greater level of flexibility.

The site allocation would have a significant positive impact on meeting housing needs for the district. For example a proposal of 1,100 dwellings could deliver the best part of 400 affordable homes for those in need with a local connection. Clearly a higher overall number would deliver more affordable units.

The entire site lies in a low risk flood area (flood zone 1), this being the area of least flood risk. There are existing employment units on this site (Hartnoll Farm Industrial Estate) which could be retained.

There are no protected built or historic assets in or around the site. No World Heritage Sites are situated within the proposed site or its vicinity. There are no Scheduled Monuments recorded in the site (although two Scheduled Monuments are recorded in the vicinity: a Neolithic long barrow 670m north-west of the site and a Bronze Age bowl barrow 900m to the north-west). There is no inter-visibility between the Scheduled Monuments and the site.

The Listed buildings closest to the site comprise bridges associated with the Grand Western Canal and the dismantled railway line. A Grade I Listed Church, two Grade II* Listed buildings and 14 Grade II Listed buildings are located within the perimeter of the Halberton Conservation Area, the western edge of which lies 550m to the east of the site.

An assessment of the potential impacts of the proposed development upon the settings of Halberton Conservation Area, 12 Grade II Listed buildings, one Grade II* Listed building and two Scheduled monuments has been undertaken on behalf of our clients. This concluded that the proposed development would not result in substantial harm to any of these designated heritage assets. A programme of archaeological mitigation works could also be agreed with the Devon County Council to provide protection.

The land adjacent to the Grand Western Canal can be protected from development and set aside as green infrastructure, in order to minimise impact. Residents of any future development may use public footpaths that pass through the Grand Western Canal County Wildlife Site, but public green space could be provided as part of any development to limit the extent of additional use.

An ecological appraisal of the site has been undertaken on behalf of our clients. This included an evaluation of habitats present and the potential for protected and notable species. The ecological appraisal also evaluated the potential implications

of development on designated wildlife sites within 2 – 8 km of the site. The appraisal found the site to be of moderate ecological value overall, with some habitat diversity and features of ecological value. The site has good ecological connectivity with the wider landscape via the Grand Western canal corridor, hedgerows and open farmed countryside.

There are two statutory and 16 non-statutory designated sites within 2 km of the site. Due to the distance of the proposed allocation from the majority of these designated sites and the disturbance and use of intervening habitat the allocation is unlikely to have a negative effect upon these sites.

The Tiverton Branch Railway Unconfirmed Wildlife Site (UWS) partly bisects the southern section of the site. This could be protected from development with habitat retention and creation at the edges of the UWS and with alternative green space provided to limit impact. The site could be retained within a well connected habitat corridor linking to the Grand Western Canal corridor.

Appropriate detailed species surveys will be carried out in due course. The appraisal identifies a number of potential ecological enhancements, which our client is currently assessing.

The proposed policy requires an agreed phasing strategy to bring forward development and infrastructure in step. The site would deliver the necessary infrastructure for the site itself and to the benefit of the wider community.

As set out previously in these representations the Sustainability Appraisal (SA) which accompanies the Local Plan Review sets out a framework of 9 indicators to help understand the sustainability effects of allocations. Hartnoll Farm performs well against these indicators – with a positive score against 6 of the 9 indicators. The overall sustainability score is +5, so there can be little dispute that the site has good sustainability credentials. We support allocation TIV2, and contend that it accords with the golden thread of sustainable development that must run through the plan making process as required by the Framework.

Thank you for the opportunity of commenting. We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind Regards

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