



Mr R Young
Programme Officer
Mid Devon Local Plan Review Examination
c/o Forward Planning
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP

14th August 2017

Dear Mr Young

Mid Devon District Council – Local Plan Review 2013-2033, Examination: Policy SP2, Issues 12 to 16 (Ref. 6790/SP2/mod – Harcourt Kerr)

In response to the Inspector's Guidance Notes and identification of matters and issues, Place Land LLP jointly acts on behalf of the landowners of the site allocated as SP2 in the emerging Local Plan Review with Harcourt Kerr. We respond on identified issues 12 to 16 only and intend on supporting this statement at the examination session on the 27th of September. This letter and supporting information supports the previously made representation made by Philip Kerr on behalf of the landowners under reference 6790 and we do not replace him as an attendee at the session. Place Land LLP has a promotion agreement with the landowners of the SP2 site and has submitted a planning application for up to 84 dwellings on the site currently identified as SP2 in the draft Local Plan Review document. At the time of submission of the original representation, the promotion agreement was not in place.

The application is being made on the basis of Mid Devon District Council not being able to demonstrate a sufficient supply of housing land to meet the identified strategic housing requirement in adopted policy. We do not consider that the emerging draft Local Plan Review document provides much respite in this respect, certainly in the short term. Our case against the formulation of the housing delivery strategy in the Local Plan Review is that there are major constraints to delivery of housing occurring as expected by the LPA. This is a matter of fact; in relation to development reliant on J28 of the M5 (i.e. most of development around Cullompton) and land to the east of Tiverton where there has been significant delay in delivery for example.

A shortfall of 255 dwellings, already identified in the Local Plan, accumulated during the first three years of the plan period does not bode well for future delivery and highlights the absence of a sound housing delivery strategy in the draft plan. Mid Devon District Council manages to buck the trend of economic recovery and increased housing delivery seen elsewhere, with delivery reducing year on year, with completions significantly under the draft strategic housing requirement of 393 dpa. Delivery was 320 dwellings in the monitoring year 2013/14, 316 in 2014/15 and 288 in 2015/16. It is

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of note that two of the proposed modifications to the Local Plan relate to an acknowledgement that the previously held assumptions on housing delivery within previous iterations of the Local Plan Review for 2014/15 and 2015/16 (456 and 476) were unachievable. This is despite the following supporting text stating that the Council is confident that there will be delivery of sufficient housing to meet the identified requirements. This confidence is misplaced, as undershooting against previous assumptions by 140 dwellings in 2014/15 and by 188 dwellings in 2015/16 demonstrates. The assumed delivery for the next five years (assuming a April 2016 start date) is, 488, 474, 714, 607 and 373. All available evidence points towards the LPA's assumptions being overly optimistic and unrealistic.

Comments relating to housing delivery form part of the context as to why the site at Sampford Peverell needs to be considered as part of the housing strategy for the plan area. This comment applies to many other sites. The LPA needs to have a deliverable housing strategy that meets housing requirements regardless of the existence of the proposed allocation at J27. The SP2 site clearly, in our view, forms part of that overall deliverable housing strategy; the overly Tiverton/Cullompton/Crediton focus is not delivering and will fail to do so, certainly in the short to medium term.

This submission is supporting by the following information.

- 1) Indicative Layout, prepared by Richards Urban Design
- 2) Design and Access Statement, prepared by Richards Urban Design (draft and incomplete)
- 3) Heritage Statement, relating to Issue 13, prepared by Expedite
- 4) Character Assessment Summary, relating to Issue 14, prepared by Richards Urban Design and Aecom
- 5) Technical Note relating to Issue 15, prepared by Hydrock

Turning to the identified issues.

Issue 12 - If a site in Sampford Peverell is necessary to cater for additional housing need resulting from the Policy J27 allocation, is this site the best performing?

We do not consider that development of the SP2 is necessary for additional housing created by the J27 allocation per se. We do however consider that the LP Review needs to allocate SP2 and other sites in order to meet its housing requirements so that it is not vulnerable to a challenge on the issue of five year land supply again. Given the origin of the SP2 allocation as some form of link with J27, we understand the need to ask the question in this form. However, in no other area of the plan does policy make this direct causal link between delivery of employment and nearby housing; there is an overall strategic housing requirement that is derived from the FOAN (provision of employment being one of the factors influencing the FOAN and the strategic 'policy on' housing requirement) and this requirement is met by providing housing in sustainable locations. This is primarily focussed on Tiverton, Cullompton and Crediton, but there are also many villages that can accommodate development, such as allocated at Sampford Peverell or at other villages in the plan area. Other allocations for housing are not tied to specific allocations for employment elsewhere and there is no need for this to be the case in this instance. There is a strategic housing requirement and the SP2 site is a suitable and sustainable site to contribute towards meeting that need.

In relation to the 'best performing' element of the identified issue, we do not consider that there is a finite number of 60 dwellings that needs to float around until the 'best performing' site is identified. Given our concerns on the overall housing strategy, the whole Local Plan needs a thorough review in our opinion. Our view is that, firstly, the village is suitable and sustainable location for growth of this scale, outwith consideration of the existence of development at J27 or not. This is especially the case considering the already expanding shortfall against the identified strategic housing requirement. We query how the LPA can consider its housing delivery strategy sound when the delivery figures are already evidencing the opposite. Secondly, the application submission (summarised within this submission) sets out technical means of addressing matters such as highways, ecology, landscape impact, drainage etc. There is no harmful impact that outweighs the significant benefits of delivery of market and affordable housing in a sustainable location, with excellent public transport links and a good level of services and facilities.

In conclusion, we consider SP2, and deliverable sites like it, is necessary to meet the plan wide housing requirement first and foremost. It is suitable and sustainable with good access to facilities, public transport and services. It is clear that the current strategy, albeit unadopted and emerging, is already failing to deliver the housing necessary to meet needs. Land at SP2 is deliverable; assuming a favourable decision by the end of 2017 at a local level, the site could see completions in the first quarter of 2019. We have already received approaches from regional and national housebuilders expressing a desire to acquire the site. Market interest in a suitable, deliverable and sustainably located site should not be overlooked especially in the context of lack of delivery elsewhere in the plan area.

Issue 13 - Does the proposed allocation have sufficient regard to the historic environment?

We append a note prepared by Expedite in relation to heritage matters in response to this issue. The Inspector will note that the proposals map (in respect of SP2) was amended to address heritage matters prior to submission. We do not consider that heritage matters are of such significance as to sterilise the site for development. Appropriate regard has been had to this important matter in terms of policy formulation and also in the design response within the submitted planning application.

Issue 14 - Does the proposed allocation have sufficient regard to the character and appearance of the area?

We append a note prepared by Richards Urban Design and Aecom in response to this issue. The contents of this note should be self explanatory.

Issue 15 - Is the proposed allocation properly accessible, for pedestrians in particular?

We append a note prepared by Hydrock in response to this issue. The contents of this note should be self explanatory.

Issue 16 - Is the tie to Policy J27 strong enough?

As should be clear from above, we do not consider that there should be, or that there needs to be, a direct causal link between J27 and SP2. There is a strategic housing requirement, that is partially informed by the proposed allocation at J27, and there is a housing distribution strategy that seeks to allocate deliverable sites for housing in sustainable locations. It is fanciful and plainly incorrect to assume that workers at J27 will all live at SP2 or that residents of SP2 will only work at J27 on the basis that there is some policy link between the two sites in the Local Plan Review. We consider that SP2 can deliver houses in a sustainable manner and that it is unnecessary to specifically link its delivery to employment generating development elsewhere; this does not occur elsewhere in the plan area. We consider that SP2 can deliver market and affordable houses regardless of J27, thereby helping to meet key policy requirements to boost the supply of housing as set out in the NPPF.

These comments will be supported at the examination hearing on the 27th of September.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'N. Jillings', is centered on a light gray rectangular background.

Neal Jillings BSc (Hons) MA MRTPI
Partner

For and on behalf of Place Land LLP