

Our Ref DS/SJS/1720
Date 29th March 2018



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Sustainability Appraisal Consultation 2018
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP



Dear Sir/Madam,

REVIEW AND SUSTAINABILITY APPRAISAL

We have reviewed the additional work carried out by the Council since they made their request to adjourn the examination hearings scheduled for 26 & 27/09/2017.

We consider that the work carried out by the Council fails to address the issues identified by the Inspector for consideration at those sessions for the following reasons:

A regional need for the retail element, and the comparison goods floor-space in particular, has not been demonstrated. The Council have not commissioned a specialist report to support their proposal and we can only conclude that there is no demonstrable need for the retail floorspace proposed and that, even if that were the case, then there are sequentially preferable sites within Mid Devon upon which such uses can be met i.e. at Tiverton.

There is no further evidence presented that robustly demonstrates a need for the scale of the tourist attraction proposed. We conclude that there is no demonstrable need for the tourist attraction proposed by policy J27. The Council's work confirms that the tourist use is not viable on its own. It is not sound planning practice to allocate retail uses to cross subsidise a non-viable leisure use, particularly since there is no evidential need for that leisure use anyway.

A sequential test has not been carried out with sufficient rigour. The work that has been undertaken is predicated on a false assumption i.e. that the provisions of draft policy J27 cannot be disaggregated. Again, there is no evidence base to support this assertion. The case law references cited by the Council relate to the determination of planning applications, they do not constrain the ability of a

plan maker to consider the appropriacy of uses, and their mix, when preparing a plan. The Council's plan is therefore based on an unsound assumption.

If the retail and leisure proposed cannot be justified (by reference to robust evidence of need) then, accordingly the need for additional housing allocations does not arise.

If, despite the comments made above, it is determined that there is a need to accommodate the leisure and retail uses proposed at J27 (since the leisure use appears to be non-viable on its own), then there are better consequential housing sites than those proposed at SP2 and TIV16 for the reasons that we have set out in our previous representations dated August 2017 (copy enclosed).

It is evident that if new jobs are to be created at J27, then the largest existing settlement (and the one that is served by the broadest range of supporting existing services) is Tiverton. Additional residential growth at Tiverton is therefore the best option to meet the consequential housing need arising from Policy J27 – there is no need to place some of that allocation into a village location with limited services, nor is there any clear justification to do that.

Further, TIV16 is not deliverable, and it does not pass the sequential test, due to the availability of other sites that can accommodate such housing needs.

Whilst it may be that the additional work carried out by the Council may be proportionate to that necessary to undertake an SEA, that does not mean that it can be relied upon by the Council to justify choices made about the acceptability of housing sites in preference to other sites that have been proposed to accommodate similar needs. In the case of Hartnolls Farm at Tiverton a large body of detailed information has been submitted (an ES) to demonstrate the suitability of that site to accommodate development needs. The work carried out by the Council is simply not, by comparison, substantive and it fails to provide sufficient evidence to justify the choices made by the Council in their proposal of policies SP2 and TIV16. A comprehensive and robust analysis of potential housing sites needs to be undertaken to inform the Council's decision-making.

Kind regards,


David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd

Enc

MID DEVON LOCAL PLAN REVIEW
PRELIMINARY HEARINGS

REPRESENTOR NUMBER 4675

PREPARED FOR WADDETON PARK LTD

AUGUST 2017



PCL Planning Ltd 1st Floor, 3 Silverdown Office Park, Fair Oak Close,
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MID DEVON LOCAL PLAN REVIEW

PRELIMINARY HEARINGS

1. Introduction

- 1.1 We have previously provided representations, on behalf of Waddeton Park Ltd, to the Local Plan Review Proposed Submission, firstly on 24/04/15, and latterly on 10/02/17 (I presume you have copies of both letters, that are self-explanatory and, unfortunately, largely repetitive).
- 1.2 The repetitiveness underlies the consistency of our client's position – essentially that the spatial strategy of the plan is fundamentally flawed for the reasons set out in those letters.
- 1.3 Our client's position remains as set out in those letters, i.e. that a greater proportion of development should be provided at Tiverton than the plan currently provides for, irrespective of your consideration of the 'Junction 27' matter and the related **SP2** and **TIV16** proposals.

2. Comments

2.1 We make the following specific comments in relation to the Inspector's questions.

17. *If a site in Tiverton is necessary to cater for additional housing need resulting from the Policy J27 allocation, is this site the best performing?*

2.2 The short answer to the question posed is no. There are many criteria that need to be considered when assessing site suitability. Space does not allow a detailed consideration of all factors, but the main reasons why this site is not a 'best performing' site are summarised below.

2.3 The site currently performs a valuable function as flood plain, and there is other land that is not subject to flood risk that is available to meet housing and employment needs in a sustainable manner (see answer to question 19 for further comment on this issue).

2.4 The site currently accommodates employment uses, that are not as vulnerable to flooding as residential uses, and that are satisfactorily accommodated and sustainably located (paying particular regard to accessibility to such uses).

2.5 We are not aware of any significant record of detrimental impacts upon water quality posed by the existing TOGS (Newbury Metals) use. Such matters are carefully controlled via other legislation. We consider that this risk, that has been present for a considerable period of time, is overstated. Similarly, the de-contamination issue raised in the plan (see paragraph 3.60e) in relation to the former poultry works is not an issue if the site remains in employment use.

2.6 There is no need for the proposed safeguarded road in relation to serve either; the existing eastern urban extension, nor the Hartnoll Park (further extension) proposal. The existing urban extension permissions were

granted without reference to delivery of this road. There's a simple reason for this that has two limbs:

- The existing A361 is part of the national route network and has capacity to deal with the traffic movements that will result from the proposed development.
- Blundells Road is the former A361 national route. Whilst this road has been 'de-trunked' it remains suitable to carry a significant volume of traffic. Any safety concerns in relation to the road serving Blundells school have recently been reduced by the new traffic calming scheme that has been implemented. The function of this straight and direct route is no longer a through route (that function is now performed by the existing A361) but as a short and direct route to the town centre. As such traffic speeds will be low.

2.7 For good reason the previous local plan made the eastern urban extension allocation (carried forward in this plan by policy TIV3). Our clients have worked with the Council to prepare SPD for that site, and planning permissions have been granted for the majority of the allocation. There is obvious potential to further extend that site (via the Hartnoll Park omission site that we propose) and the draft application submission documents that have been submitted explain, in some detail, how that site can be satisfactorily developed. The Hartnoll Park site is plainly 'better performing' than the TIV 16 site (formerly TIV 9), that has been inappropriately 'resurrected'. It is wholly inappropriate to allocate that site, in preference to the Hartnoll Park site.

18. Is the site deliverable?

2.8 Again, the short answer is no. There are clear reasons why the TIV 9 allocation did not come forward (those reasons are set out in the Deliverability Assessment prepared by Harcourt Kerr that is appended to this statement as appendix 1). All of those reasons set out in that document

still prevail and they concur with the SHLAA panel's assessment of this site (see appendix 2).

- 2.9 The Council are wrong to assert (as they do at paragraph 3.60b, page 84 of the plan) that owners seeking allocation supports the view that the site is viable. That is a naive statement and abrogates an assessment of those issues that affect deliverability, and flies in the face of the professional assessment that has been carried out (on the Council's behalf). There is no evidence to support the Council's current position.
- 2.10 Site owners acknowledge that there are a number of technical issues that require resolution. Those matters remain unresolved. In our opinion, the site is simply not deliverable. The pedigree of non-delivery that the site benefits from was correctly recognised by the Council in the initial proposed submission plan 2015.
- 2.11 The Blundells School site was removed from the local plan as a proposed housing allocation following a review by the SHLAA Panel in 2014. The reason for the site being considered unachievable was due to the prohibitive costs associated with access, flood mitigation matters as well as multiple ownership and land remediation. The site has been allocated in the local plan since 2010 and has not been brought forward for development so these issues are plainly apparent.
- 2.12 Quite why the council have chosen to re-allocate the site now is somewhat unclear, bearing in mind that better, and more deliverable, alternatives are available to them.

19. Is the approach to the compensatory flood plain adequate?

- 2.13 We suggest that if the correct approach to site selection is taken that this question does not arise.
- 2.14 The site currently performs a valuable function as flood plain, and there is other land that is not subject to flood risk that is available to meet housing

and employment needs in a sustainable manner. Framework 100 provides clear policy on this matter. TIV 16 is vulnerable to flooding and the proposed allocation is not in accordance with Government policy on this matter (the sequential approach). Paragraph 3.60c of the plan asserts that:

"The flooding issues associated with the development of this site have been examined. The regeneration and sustainability benefits arising from redevelopment are sufficient that the sequential test set out in national policy is overcome, and the measures set out in the policy overcome the exceptions tests."

2.15 We have two problems with this statement. Firstly, that the benefits are overstated (for the reasons set out in answer to question 17). Secondly, that Government policy requires Local Plans to be supported by Strategic Flood Risk Assessment (SFRA), and apply a sequential, risk-based approach to the location of development. We can trace no evidence of either of these matters being reviewed between the publication of the Proposed Submission Plan (in April 2015), and the subsequent amendment (in February 2017). Accordingly, we do not accept that the proposal (or the plan, bearing in mind the inclusion of designated flood plain land in the Cullompton [CU7-CU12] allocation) has been prepared in accordance with Government policy. We consider that our client's site (Hartnoll Park) has been prejudiced by the lack of any comparative assessment review in accordance with Government policy (due to the clear existence of sequentially preferable sites).

20. Is there sufficient appreciation of the historic environment (the setting of Knightshayes in particular)?

2.16 No comment to make.

21. Does provision have to be made within the policy to tie it to Policy J27?

2.17 For the reasons set out in our letters, and covered in the introduction to this statement, we do not consider that further development at Tiverton

should have to tie to policy J27 – there are good reasons for further development at Tiverton in this plan period, irrespective of the outcome of your considerations of the J27 matter (for the reasons that we have set out). If there are specific reasons why the J27 development should be embargoed until further residential development comes forward at Tiverton then we are not aware of them.

APPENDIX 1

TIV 16

formerly TIV9

Deliverability Assessment

Updated July 2017



Harcourt Kerr

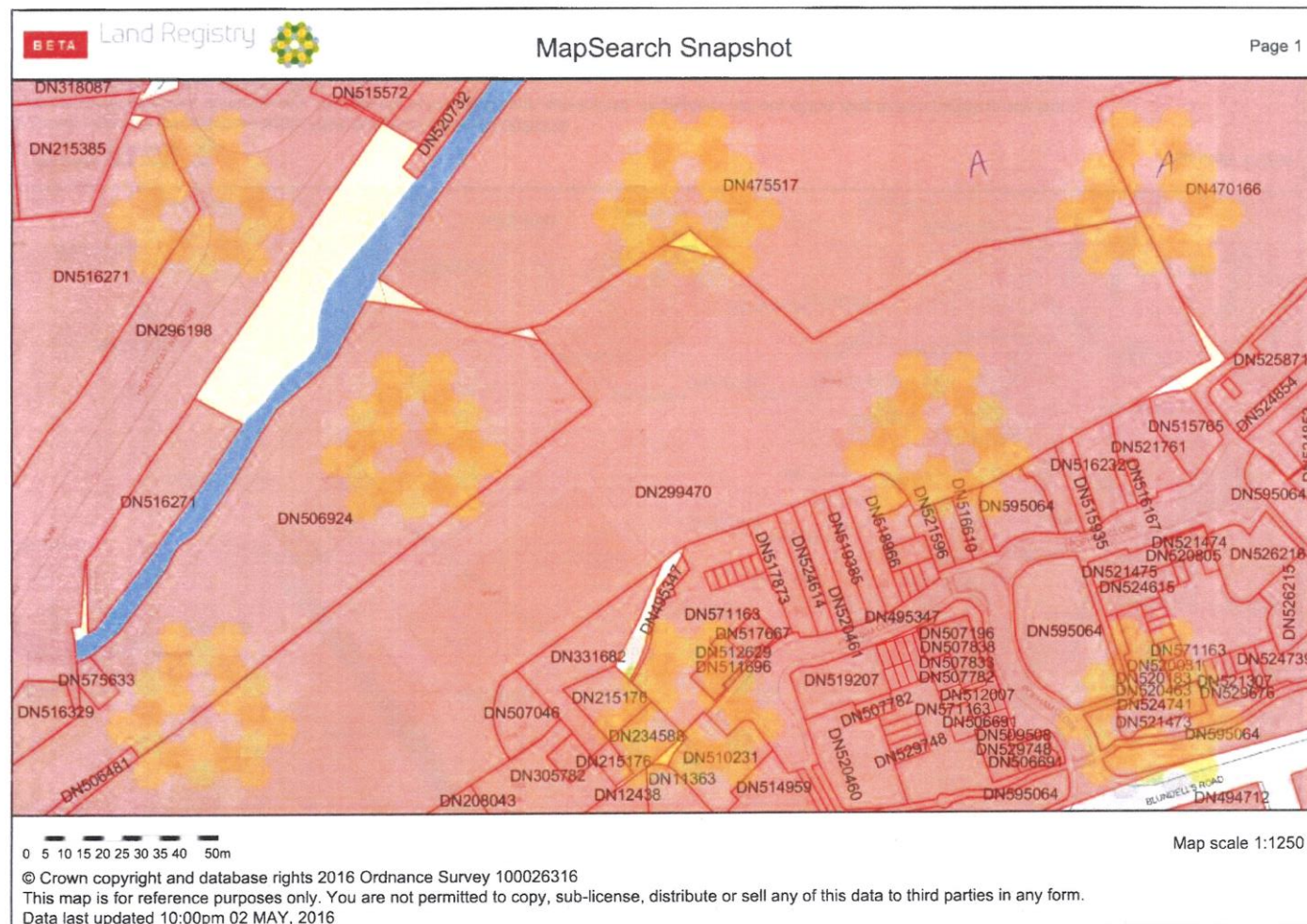
Harcourt Kerr provides commercial and market related development advice to landowners and the industry throughout the south west. It is run by Philip Kerr FRICS with over 35 years' experience in the business, of which nearly 20 years have been in the south west with a number of current and recently executed housing and employment schemes in each of the main towns and in the rural areas of the Mid Devon District.

Philip Kerr was instructed by Blundell's School in 2002 to 2004 to look at potential for various sites including the land within TIV16, however for viability reasons the pursuit of planning was dropped. However other sites close by were identified and gained planning with the result houses were built and are now fully occupied.

In 2014 to 2016 he was instructed by local well known developers to look at the potential of the site particularly if it could be assembled and then delivered as a viable commercial, residential or mixed opportunity.

Schedule of land ownerships

Trowers and Hamlin Solicitors carried out index searches in the following map area covering TIV 16:-





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Data last updated 10:00pm 02 MAY, 2016

Map scale 1:1250

Tiverton - Horsden – Land Ownership Schedule

LR Title No.	Owner	Comment
DN475517	Blundells School (company registration no 4016403) Contact address: Blundells School, Blundells Road, Tiverton, Devon, EX16 4DT	Land at Blundells School, Blundells Road, Tiverton EX16 4DT Held by current owner since 2003 Price not stated Mortgaged to AIB Group (UK) PLC with charges dated 21 December 2006 and 17 April 2009
DN470166	Blundells School – same as DN475517	Land at Blundells School, Blundells Road, Tiverton EX16 4DT Held by current owner since 2002 Price not stated Mortgaged to AIB Group (UK) PLC with charges dated 21 December 2006 and 17 April 2009
DN506924	Togs Limited (company registration no 5210481) Contact address: 4 Ashton Road, Marsh Barton, Exeter, EX2 8LN	Land and buildings lying to the north of Blundells Road, Tiverton Held by current owner since 2006 Price not stated No mortgage
DN506481	Togs Limited - Same as DN506924	Land lying to the north of Blundells Road, Tiverton Other details same as DN506924
DN431222	Togs Limited - Same as DN506924	Land and buildings at Blundells Road, Tiverton Other details same as DN506924
DN444277	Togs Limited - Same as DN506924	Land lying to the north-west of Blundells Road, Tiverton Other details same as DN506924

THL.124236550.1

1

CAR.56436.123

DN575633	Western Power Distribution (South West) Plc (company registration no 2366894) Contact address: Avonbank, Feeder Road, Bristol, BS2 0TB	Electricity Sub station Held by the current owner since 2008 Price not stated No mortgage
DN516329	Mid Devon District Council Contact address: Phoenix House, Phoenix Lane, Tiverton, Devon, EX16 6PP (DX 49011 Tiverton)	Land on the south side of Siddalls Gardens on the east side of Heathcoat Way, Tiverton. Held by the current owner at least since first registration in 2005 Price not stated No mortgage
DN520803	Mid Devon District Council Contact address: Phoenix House, Phoenix Lane, Tiverton, Devon, EX16 6PP (DX 49011 Tiverton)	Land lying to the east of Heathcoat Way, Tiverton Held by the current owner at least since first registration 2005 Price not stated No mortgage
DN515899	Devon County Council Contact address: County Hall, Topsham Road, Exeter, EX2 4QD	Land forming part of Heathcoat Way, Tiverton Held by the current owner since at least first registration in 2005 Price not stated No mortgage
DN299470	Amber Real Estate Investments Limited (company registration no 07191982) Contact address: 2 nd Floor Colmore Court, 9 Colmore Row, Birmingham, B3 2BJ	Land and buildings at Poultry Plant, Blundells Road, Tiverton EX16 4DF Held by current owner since 2015 Price stated to be £600,000 as at 21 May 2015 No mortgage
DN439822	Amber Real Estate Investments Limited – same as DN299470	Land and buildings lying to the north of Blundells Road, Tiverton Held by current owner since 2014 Price paid £600,000 as at 4 August 2014 No mortgage

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2

CAR.56436.123

DN614738	Christine Irene Scotchmer Contact address: Mearhay Black Dog, Crediton, Devon, EX17 4QF	Horsdon Garage, Blundells Road, Tiverton EX16 4DE Held by the current owner since 2011 Price paid on 31 August 2011 for this and the land in title numbers DN616249 and DN615246 - £180,000 No mortgage Subject to a lease of Horsdon Garage dated 28 May 2010 for a term of 5 years expiring on 27 May 2015 (no further details on the register).
DN616249	Christine Irene Scotchmer – same as DN614738	Land to the South West side of Horsdon Garage, Blundells Road, Tiverton EX16 4DE Length of ownership/price paid/mortgage details same as DN614738 Possessory title only.
DN615246	Christine Irene Scotchmer – same as DN614738	Land on the south-east side of Horsdon Garage, Blundells Road, Tiverton Length of ownership/price paid/mortgage details same as DN614738 Qualified title only (subject to query over earlier conversion of long leasehold to freehold interest)
DN215176	Jean Patricia White Contact address: Rosebank, Whitnage, Uplowman, Tiverton, Devon, EX16 7DT	2 Copplestone Mews, Blundells Road, Tiverton EX16 4DE Held by the current owner since 2001 Price paid on 1 March 2001 was £55,000 No mortgage
DN305782	Greenterm Property Management Limited (company registration no 2437808) Contact address: Ailsa Brook House, Blundells Road, Tiverton, Devon	[Flat 2] Ailsa Brook House, Blundells Road, Tiverton EX16 4DE Held by the current owner since 1991 Price not stated No mortgage Subject to long leases of four flats within the building
DN208043	Guy Charles Rawdon Langworthy Contact address: Plantation House,	Land and buildings lying to the north of Blundells Road, Tiverton Held by the current owner since 1999

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3

CAR.56436.123

	Washfield, Tiverton, Devon	Price paid not stated No mortgage
DN309240	Penelope Ann Swift Contact address: 7 Pinnex Moor Road, Tiverton, Devon	Land lying to the north of Blundells Road, Tiverton Held by current owner since 1992 Price paid not stated No mortgage

NOTE: uncoloured sections on the Mapsearch plan represent the approximate extent of areas of unregistered land for which the adjoining registered owners would need to provide clarification/evidence of ownership.

Ensuing Activity

Through client and personal contact, we made approaches to the owners with varied responses as follows:-

Blundells School – own representatives wishing to see development	Interests fully ransomed by all other interests unless development was to come through the school grounds
TOGS (Newberry Metals) – four titles	Land is a scrap metal merchant with heavy moving costs and special licences to operate, difficult to replicate in another location. Contamination likely from over 50 years of working in metals, cars and liquids on the site. No need to move. Cost of moving exceeds any land value achievable in Tiverton (any use)
Amber Real Estate (former poultry works) Two interests adjoining	Price of £1.2m as (£600,000+£600,000 per interest) exceeds the value likely to be able to be paid as part of a comprehensive equalised development for residential development land in Tiverton
Horsden Garage – CI Scotchmer	Going concern of considerable value. Active petrol station with possible contamination issues for housing development. Part title possessory or qualified only
Mid Devon District Council three smaller interests	Assumed available
Other smaller peripheral interests	Assume available at right price
Area of “white access land “	Unregistered land used over many years by all the major interests - requires unravelling. Ambiguous ransom positions.

Concluding remarks

- The land has enough disparate interests in viable working business to make the site complicated to assemble.
- The likely values required to make the current businesses move to new sites will be well in excess of the value to be derived from a sale of the land for residential purposes.
- The additional value that could be transferred from the Blundell's land in payment of a ransom would not tip the balance to entice the "front owner" to move.
- There appears to be little appetite from the main ownerships to take on the risks of obtaining planning and the development industry continues to shy away from 'a difficult site' with the result there is no investment from external forces.
- The retail supermarket traders (where extraordinary prices for Tiverton could be paid) have also been unable to unlock the site. We have first-hand knowledge of this.
- One of the early questions always asked is how much it will cost to achieve a new road entrance to the site from Heathcote Way (or any other means)? On quick estimates this appears to be so high as to put off pursuit of the site. So more work needs to be done to see if infrastructure and flood prevention are in fact barriers to anything but the status quo until Tiverton land values rise substantially (we looked at this in 2003 and it was over £3m at that time).
- We have canvassed the development and occupational markets and conclude that it might be fifteen years before the site is able to be redeveloped in a viable fashion.

APPENDIX 2

SHLAA Panel Meeting
Friday 6th June 2014, 9.30am
Exe Room, Phoenix House

Attendees:

Alex Hugo, Barratt Homes
 Mike Bailey, Stevens Homes
 Philip Kerr, Harcourt Kerr
 Rob Finch, Devon and Cornwall Housing Association
 Ralph Farleigh, KF Farleigh Ltd
 Ian Sorenson, Devon County Council
 Jessica Crellen (for Shaun Pettitt), Persimmon Homes SW
 Amy Roberts (for Iestyn John), Bell Cornwall
 Laura Horner, Natural England
 Cllr Richard Chesterton, Mid Devon District Council
 Cllr Polly Colthorpe, Mid Devon District Council
 Dean Titchener, Mid Devon District Council
 Nick Cardnell, Mid Devon District Council

Apologies:

Joanne Fox, Sovereign Housing Association
 Steve Russell, Devonshire Homes
 Iestyn John, Bell Cornwall
 Shaun Pettitt, Persimmon Homes SW
 Sally Parish, Highways Agency
 Andrew Bagnell, Drew Pearce

1. Welcome, introductions and apologies

Dean Titchener welcomed the attendees, and gave details of the apologies. Each panel members introduced themselves given some attendees were new.

2. Minutes of the previous meeting

The minutes of the previous meeting were considered an accurate reflection of the discussion.

3. Methodology update

Dean Titchener provided an update on amendments to the SHLAA methodology, in relation to housing for older people and students, discussed at the previous meeting. Katharine

Smith had undertaken further research on housing for older people and this information was presented at the meeting. Following discussions with two homes in Exeter, it was stated that one had 50% of residents previously living alone (and therefore freeing up a dwelling) and another had 88%. This information (i.e. circa 72%), seemed to back up the earlier research that for every 1.4 bedrooms in a home, 1 dwelling elsewhere is freed up. However, the panel raised concerns that this methodology did still not reflect the difference between a residential home and a nursing home. The types of homes were noted as being different in that residential homes are more likely to free up accommodation than nursing homes, which are not necessarily permanent forms of residence. It was noted that the Government would shortly be bringing out their Housing Flow Reconciliation Form for the year ending 31 March 2014 and that this should set out how housing authorities should include institutional homes in their supply figures. It was agreed that updating this part of the methodology would need to wait until the Government figures are made available.

Separately, Laura Horner raised a number of queries regarding the environmental information as presented in the site appraisals documents. She noted that the methodology required each appraisal to include detail of European wildlife sites in proximity to SHLAA sites, and that this should be considered under 'Stage A'. This was felt to be satisfactory, particularly given that there are no European sites within Mid Devon, however it was felt that many sites of lesser designations, such as County Wildlife Sites, Local Nature Reserves, Priority Habitats etc. had been omitted from the appraisals. This information was available on the Magic website. Dean Titchener confirmed that these designations had been included, as the Council has them mapped locally. In some cases they were in the appraisal under Stage A, rather than B however. It was agreed that the Council would check designations against those on the Magic website to make sure all had been included. A meeting to discuss the issue was also suggested by Natural England, and Dean Titchener agreed to set this up.

ACTION: Check SHLAA site appraisal's environmental information against Magic website. Set up meeting between the Forward Planning Team and Natural England.

4. Sites discussion

Dean Titchener explained that the panel had been sent two booklets of SHLAA site appraisals. These represented a working list of preferred sites prepared by officers for consideration by the panel. They were all sites that had been previously assessed by the panel, but now only the part of the site proposed for allocation was put forward, along with potential policy criteria. It was explained that the final list of preferred sites was likely to be different, as the results of further evidence came to light, whilst elected members had not yet had their opportunity to feed into the process.

Dean Titchener introduced each site, giving a brief summary of the site's characteristics, the policy criteria proposed and the panel's previous determination. The panel then discussed each site and determined whether each site was achievable and whether the yield and commencement rate set out was appropriate.

The following decisions were made per site:

Tiverton, Cullompton and Crediton sites

Site	Rationale/comments	Decision / Quantity
Tiverton Site 1, Tiverton Eastern Urban Extension	Year 2 start confirmed given part of site has outline consent (subject to two other sites getting consent) for 330 dwellings.	Achievable; 1550 dwellings & 30,000 sqm commercial
Tiverton Site 2, Land between Blundells School and River Lowman	Multiple viability issues raised including flooding, access, multiple landownerships, land remediation. Site only considered likely to come forward if road is needed in conjunction with Hartnoll Farm coming forward or if a smaller site area outside flood zone with single access to point to west (subject to Transport Assessment) considered to be allocated.	Unachievable (except in circumstances noted)
Tiverton Site 4b, Howden Court	No comment. ACTION: Site area incorrect on appraisal – this to be amended to 0.53ha.	Achievable; 10 affordable dwellings
Tiverton Site 6, Palmerston Park	Previously considered unachievable due to site gradient; no change to decision. Site may require alternative woodland planting. Also queried lack of priority habitat info ACTION: check site for environmental designations.	Unachievable
Tiverton Site 7, Roundhill	Year 3 start.	Achievable; 13 affordable dwellings
Tiverton Site 8, Hay Park	Application expected shortly.	Achievable; 13 dwellings.
Tiverton Site 10, Tidcombe Hall	Year 6 start (as proposed as contingency site)	Achievable; 100 dwellings.
Tiverton Site 11, Wynnards Mead	Year 6 start due to availability, low density due to listed buildings and landscape considerations.	Achievable; 70 dwellings
Tiverton Site 12,	Year 3 start.	Achievable; 8 dwellings

Moorhayes Park		
Tiverton Site 18, Phoenix Lane	Year 6 start given complexities of site, i.e. multiple ownerships (though 3 main landholdings), town centre regeneration etc, heritage considerations	Achievable; 60 dwellings, mixed retailing/office /leisure uses
Cullompton Site 1, NW Cullompton	Year 4 start to reflect need for and progress of masterplanning (consultation anticipated to start July 2014).	Achievable; 790 dwellings, 21,000 sqm
Cullompton Site 2, Growen Farm	NE raised concern about Grade 2 agricultural land and need to consider this during preparation of Sustainability Appraisal. Year 4 start as per Site 1	Achievable; 160 dwellings
Cullompton New Site 3 Emmett Lane/Rull Lane	Year 4 start as per Site 1.	Achievable: 200 dwellings
Cullompton Site 5, Ware Park & Footlands	Year 6 start to reflect would come forward after Knowle Lane.	Achievable; 38 dwellings
Cullompton Site 9, Land at Colebrooke	Concern raised regarding quantity of Green Infrastructure/Flood Zones. 2.7ha figure seems high given 4.8ha size of site. ACTION: Check area of flood zone/GI	Achievable only if floodzone/GI is no bigger than 20-30% of site area; 100 dwellings
Cullompton Site 18, East Cullompton	Concern re market capacity, given numbers coming forward in Cullompton. Large infrastructure requirements, which will need external funding. Not to start until Year 11.	Achievable; 2600 dwellings, 32,400 sqm commercial
Cullompton New Site 4, Acklands	Year 6 start to reflect it will only come forward after Knowle Lane.	Achievable; 34
Crediton, Site 1 Wellparks	Year 2 start to reflect planning application now in. ACTION: Check map boundary as not consistent with allocated area	Achievable: 185 dwellings
Crediton Site 2 Cromwells Meadow	Reduced density to 40. Year 3 start.	Achievable; 40 dwellings.
Crediton Site	Year 3 start.	Achievable; 8

4, The Woods Group		dwellings
Crediton Site 5, Pedlerspool	Natural England concern over priority habitat – though this area not proposed for inclusion within site boundary. Planning application due. Year 3 start. ACTION: Amend parish details to state Sandford.	Achievable; 195 dwellings; 21,000 sqm commercial
Crediton Site 6, Sportsfield	Year 6 start given relocation of rugby pitch and SoS approval for disposal.	Achievable; 50 dwellings
Crediton Site 7, Barn Park	Year 3 start.	Achievable; 20 dwellings
Crediton Site 16, Land off Alexandra Close	Year 3 start now confirmed as available.	Achievable; 15 dwellings

Rural Sites

Site	Rationale/comments	Decision / quantity
Bampton Site 2, Newton Square	Year 3 start.	Achievable; 5 dwellings
Bow Site 1, West of Godfrey Gardens	Year 2 start as has planning permission.	Achievable; 6 affordable dwellings
Bow Site 6, Land adj Hollywell	Year 3 start.	Achievable; 20 dwellings
Bradinch Site 1, Hele Road	Year 3 start.	Achievable; 5 dwellings
Chawleigh Site 1, Barton	Year 3 start.	Achievable; 20 dwellings
Cheriton Bishop Site 5, Land north of Brakes View	Year 3 start.	Achievable; 30 dwellings
Cheriton Fitzpaine Site 2, Land adj primary school	Year 3 start.	Achievable; 26 dwellings

Cheriton Fitzpaine Site 3, Land off Barnhill Close	Year 3 start.	Achievable; 12 dwellings
Copplestone Site 2, The Old Abattoir	Year 3 start.	Achievable; 30 dwellings
Culmstock, Site 1 Linhay Close	Car parking an issue on this road. May need to consider lower density accordingly. Increase site area to include small square adjacent to north west. Increase yield. Year 3 start.	Achievable; 6 dwellings
Culmstock, Site 2 Highfields Hunters Hill	Natural England has concerns about potential landscape impacts on AONB. Also concern about traffic capacity of junction by school and increased likelihood of accidents associated with additional traffic use. ACTION: Ian Sorenson to look at accident record. Year 3 start.	Achievable; 10 dwellings
Halberton, New Site 1, Land adj Fisher's Way	Transport Assessment no longer required (as confirmed by Highways Agency). Year 3 start.	Achievable; 10 dwellings.
Hemyock, New Site 2, Depot	Year 3 start.	Achievable; 8 dwellings
Lapford, New Site 1	Year 3 start.	Achievable; 15 dwellings
Morchard Bishop, Site 1 Greenaway	Year 3 start.	Achievable; 20 dwellings
Newton St Cyres, Site 2, Court Orchard	Year 3 start. ACTION: Investigate possibility of existing school site and adjacent land being used for housing once school relocates.	Achievable; 25 dwellings
Sampford Peverell, New Site 1, Former Tiverton Parkway Hotel	Year 3 start.	Achievable; 10 dwellings
Sandford, Site 1 Fanny's Lane	Year 3 start.	Achievable; 27 dwellings
Silverton, Site 1, Land at Old Butterleigh	Year 3 start.	Achievable; 8 dwellings

Road		
Silverton Site 4, Livinghayes Road	Year 3 start.	Achievable; 8 dwellings
Thorverton, Site 1a, Allotments & paddock	Year 3 start.	Achievable; 11 dwellings
Uffculme Sites 1 & 7 (combined), Harvesters/land west of Uffculme	Year 3 start.	Achievable; 32 dwellings
Willand Sites 3 & 4 combined, Land east of M5 and west of B3181	Year 3 start. ACTION: Compare agricultural land grades between this site and Willand Sites 1 & 2 Quicks Farm	Achievable; 42 dwellings

A SHLAA Report, detailing the decisions of the panel will be produced later in the year and will be circulated to the group. It will form part of the evidence base of the Local Plan and will need to be available by the time the Local Plan consultation begins in the autumn.

5. Any other business

Laura Horner gave details of a new bespoke service being offered by Natural England to provide advice on planning issues. It could be useful on larger sites, or where green infrastructure is to be provided, or where there are protected species. It is a chargeable service. Applicants would need to complete a proforma to initiate the service; a contract will be signed between the Natural England and the applicant.

Dean Titchener thanked the panel for their attendance, and confirmed that this is anticipated to be the last Mid Devon SHLAA panel meeting this year.

The meeting closed at 12.30pm.