

**Planning Consultation (DPD)**

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**From:** Michael Rees  
**Sent:** 11 April 2018 13:05  
**To:** Planning Consultation (DPD)  
**Subject:** Sustainability Appraisal update consultation  
**Attachments:** 180411 Mid Devon SA Update representations.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam, on behalf of our clients Barratt David Wilson Homes, please find attached our representations.

Yours faithfully,

**Michael Rees MRTPI**  
Director

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11 April 2018  
Our Ref: MJR/16.105

Head of Planning  
Forward Planning  
Mid Devon District Council  
Phoenix House  
Phoenix Lane  
Tiverton  
EX16 6PP

Dear Sir / Madam,

**Consultation on the schedule of amendments made to the Sustainability Appraisal Update (2018)  
Mid Devon Local Plan Review**

On behalf of our clients Barratt David Wilson Homes, we are writing to set out our considerable concerns in respect of the Sustainability Appraisal (SA). Principally, these concerns focus on the SA's baseline evidence which is now up to 5 years old (2013/14) and out of date. This out of date baseline has led to an approach to growth across the Authority and particularly at Crediton, that is flawed, unsustainable and an unsound proposition.

In this regard and for clarity this submission is supplemental to comments previously submitted in respect of land at Chapel Downs Farm, Crediton by Origin3 at the Local Plan Stage (April 2015) and LRM Planning at the Local Plan Review Stage (February 2017).

NPPG identifies the baseline of an SA as ***"the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan"*** and that ***"Baseline information provides the basis against which to assess the likely effects of alternative proposals in the plan"***. It is plainly the case that where the baseline evidence is out of date, the plan cannot be considered to be the most appropriate strategy when assessed against reasonable alternatives as required by NPPG para 182.

The SA was prepared on the basis that development was not appropriate to the west of Crediton at that time (before the Link road was opened) particularly in respect of *"The cumulative negative effect on traffic through the high street in Crediton and secondary effect on air quality from incremental development in the west of the town"*. The SA confirms that *"The housing target for Crediton only amounts to 10% of the district total due to the traffic and topographical constraints that exist."*

However recent planning decisions by the Council confirm that these perceived constraints identified in the Council's baseline assessment are in fact not a constraint to growth. Indeed application ref. 17/01090/MOUT was granted permission (March 2018) absent any objections from statutory consultees in respect of transport or air quality. It has been confirmed by both the EHO and Devon County Council that there exists further capacity in terms of both air quality and highways (at least a further 120 dwellings at our clients site app. Ref 17/0151/MOUT) on the western side of Crediton. Furthermore, an LVIA undertaken on our clients site, confirms that the landscape and visual impact will

also be limited (this was verified by PBA who prepared landscape work in respect of the additional proposed allocations).

Previous representations made in respect of our clients site (Chapel Downs Farm) have highlighted the issues within the SA and the Council's consideration of our clients site when compared to other proposed allocations particularly in terms of the inconsistent way that scoring is applied. Notwithstanding the concerns raised in those representations, when the new and updated evidence (app. ref 17/0151/MOUT) is taken into account in respect of our clients site, its score from the original January 2015 SA (of +2) would be increased to at least +5 (to reflect *inter alia* the lack of air quality and transportation constraints, the betterment that would be provided in terms of flood risk, the contribution it would make towards local infrastructure / community facilities as well as the fact that 35% affordable housing is proposed not 28%). We note that if the score was correctly amended to reflect actual proposals and technical evidence then it would actually be the joint highest score in the SA for allocations in CREDITON.

Due to the out of date baseline assumptions therefore, it is clear that the overall distribution of development across the District as well as in CREDITON is flawed, unsustainable and artificially constrained. This fundamentally conflicts with the overarching vision and strategy of the Plan which seeks to ensure that **"Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services"**. Indeed, it is not appropriate that CREDITON, which currently houses 34% of the District's population within its catchment and is one of three market towns (the highest tier within the Settlement Hierarchy) has just 10% of proposed residential allocations. In comparison, Collumpton has 32% of the District's population within its catchment area but has over 50% of proposed allocations.

This distribution is very concerning as CREDITON is allocated a lesser amount of development than is required to meet its own housing and commercial needs on the basis of outdated and flawed information, this ultimately means that the vision and objectives of the plan are unachievable from the start. We consider that given the change in baseline (as demonstrated by robust technical evidence) it follows that the approach to development at CREDITON and the County as whole is not the most sustainable or appropriate strategy.

Our clients are further concerned that there are numerous proposed allocations that they consider are not deliverable both in CREDITON and across the remainder of the Authority in the short, medium and longer term that will compound problems in terms of failure to meet fundamental housing requirements. Indeed, despite the Council seeking to bring forward Local Plan Review sites, it is notable that the housing land supply has worsened. We are even more concerned given the significant funding that is required in respect of J27.

Plainly this approach to the distribution of growth as advocated in the SA is flawed and results in a less sustainable strategy than should be delivered by the Plan. It is therefore contrary to section 39 of the Planning and Compulsory Purchase Act which requires that the authority preparing a Local Plan must do so **"with the objective of contributing to the achievement of sustainable development"**. Indeed, such an outcome can not be achieved when the strategy and distribution of growth is artificially and wrongly restricted. NPPF para 182 requires that the Plan should be justified and in order to achieve this it **"should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence."** Given the changes to the baseline and the outdated nature of the evidence, the plan cannot be considered to be the most appropriate strategy when assessed against reasonable alternatives.

In light of this there is a need to update the baseline and review the growth options for CREDITON. This work will result in a more sustainable distribution of development in line with the Council's settlement hierarchy.



If you require any further information please do not hesitate to contact me. We would welcome consideration of how the deficiencies within the SA are proposed to be addressed.

Yours sincerely,

**Michael Rees**  
**Director**

**LRM Planning Ltd**

