



Gladman Developments Limited

Mid Devon Local Plan Review 2013-2033 Examination

Hearing Statement in Respect of Vision, Spatial and Development Strategy and Strategic Policies

This Hearing Statement should be read in combination with Gladman Development Limited's representations to the Mid Devon Local Plan Review Publication Draft. The previously submitted representations address several of the issues highlighted within the Vision, Spatial and Development Strategy and Strategic Policies Hearing 1 and associated questions. The following provides additional text from Gladman in relation the questions raised under this Matter.

Questions

2) Is the OAN of 7,860 (or 393 dwellings pa) (and thereby Draft Policies S2, S3 and S4) correct?

1.1.1 Gladman broadly support the housing requirement of 393 dwellings per annum set out in Policy S2. We note that the figure is derived from the 2015 Exeter Strategic Housing Market Assessment (SHMA) which identifies an OAN range of between 359 dwellings and 381 dwellings per annum. The decision to deliver a slightly higher figure is consider appropriate and fully justified.

1.1.2 It is however considered that in order to be found sound, Policy S2 will need to be amended to state that it will deliver a minimum of 7,860 dwellings in accordance with Paragraph 14 of the NPPF 2012 which clearly states that "*local planning authorities should meet objectively assessed needs, with sufficient*

flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”.

3) Is the spatial distribution of housing soundly based in the light of possible alternative?

1.1.3 Gladman note that the plan directs the majority of growth to the towns of Tiverton, Cullompton and Crediton, with only 10% of the overall requirement (786 dwellings) being directed towards the ‘rural areas’. Whilst we acknowledge that it is appropriate to direct the majority of growth towards the most sustainable settlements, we consider that the ‘rural areas’ are capable of accommodating significantly more growth over the plan period, a strategy that would assist the Council in meeting its aspiration to protect services and facilities in the villages.

1.1.4 Gladman considers that the best way to secure rural services and facilities is through that enshrined in Paragraph 55 of the NPPF 2012 which states that “*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*”. In light of the above, we consider it appropriate to reconsider the spatial distribution and give due consideration to maintaining and enhancing rural sustainability through affording meaning growth in appropriate locations.

5) Will it maintain a 5 year supply of deliverable housing sites initially, and looking forward?

1.1.5 Having reviewed the available evidence, based on the housing allocations detailed in the Submission Plan, it is considered unlikely that adoption of the Plan is likely to result in a 5 year supply being in place initially. Gladman consider that the Plan is overly reliant upon three strategic urban extensions which are unlikely to deliver significant amounts of housing in the early years of the Plan following adoption.

- 1.1.6 The three sites, namely 1,350 dwellings at North West Cullompton, 1,750 dwellings at East Cullompton and 1,580 dwellings at the Tiverton East Urban Extension are expected to accommodate around 60% of the district's total requirement. These strategic sites proposed within the Local Plan Review, will necessitate significant policy requirements to be fulfilled and initial site and infrastructure works to be implemented prior to commencement. In addition, there are a range of circumstances that can affect build out rates over time within strategic sites, such as trigger points for the implementation of infrastructure requirements. It is therefore necessary to ensure that these strategic proposals are supplemented by a sufficient number of additional small-scale allocations to provide the necessary certainty that housing requirements will be met in full.
- 1.1.7 In order to ensure that the Local Plan Review includes sufficient flexibility so as to ensure that it can respond in the instance that the Council are unable to demonstrate a 5 year supply of housing land, Gladman recommend that the Council should incorporate a criteria-based policy to achieve this as such an approach would allow the plan to protect itself against unsustainable development at the same time being open and flexible to additional development opportunities to come forward to meet identified needs.
- 1.1.8 There would be significant implications should one or more of the strategic sites not come forward at the rates anticipated. Fundamentally, any failure to deliver housing in the manner anticipated would result in a situation where the Council would be unable to maintain a 5 year supply of housing land or meet its housing requirement in full over the plan period.