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Your Ref: MM05/MM11/MM48

Our Ref: AG/1837

Date: 10th February 2020

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

Dear Sir/Madam,

**MID DEVON LOCAL PLAN REVIEW 2013-33
PROPOSED MAIN AND ADDITIONAL MODIFICATIONS**

We write on behalf of our clients Codex Land PCC Land Promotion Cell, PM Asset Management and Persimmon Homes South West, in relation to the above consultation. In combination, these parties control the majority of the Cullompton urban extension land.

We have carefully considered both the main and additional modifications proposed by the Council.

It is apparent that these modifications fail to satisfactorily deal with all matters raised in the Inspector's Post Hearing Advice Note (May 2019).

The Council's policy in relation to Gypsies and Travellers (G&T) pitch provision will inhibit timely housing completions. The Inspector clearly understood the implications of the Council's policy approach (in the light of the policy and practice of lending institutions) and explicitly advised the Council to 'decouple' their approach to the provision of housing sites and G&T sites.

G&T provision is dealt with by the following main modifications:

- MM05
- MM11
- MM48

The Council have eschewed the Inspector's advice as the modifications referred to above fall well short of what is necessary to achieve this 'decoupling'. Whilst the proposed modifications at least introduce the possibility of off-site provision, the changes do not go far enough.

Further modification is required in order to remedy this, otherwise this matter puts the whole plan at risk.

As requested by the Inspector, the policy wording should be more explicit in decoupling housing sites and G&T sites.

However, should the Council ignore this advice and proceed on the basis of their current approach, then as a minimum any off-site provision need only be to the same standard as that originally envisaged on-site, as opposed to the suggested onerous requirement for "*...a more favourable outcome...*".

Greater flexibility should also be introduced by allowing for financial contributions towards off-site delivery in lieu of provision.

It is disappointing that the Council have decided to continue with their preferred policies, as opposed to amending them in a substantive manner to satisfactorily deal with the problem identified. This drives to the heart of the soundness tests (hence why the Inspector pointed out that main modifications were necessary in the first place).

In our opinion, the Council has declined the opportunity to propose suitable modifications to deal with this matter and, as a result, the proposed plan will not be effective.

Kind Regards



Alex Graves, BA (Hons) PG Dip MRTPI
For PCL Planning Ltd

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