



MID DEVON LOCAL PLAN REVIEW 2013 – 2033

Proposed Submission (incorporating proposed modifications) Examination

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Main Hearings - Hearing 1: Thursday 14th February 2019

Matters and Issues

**Vision, Spatial and Development Strategy, and
Strategic Policies**

Statement of Mid Devon District Council

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

3.1 Yes, the spatial distribution of housing is soundly based in the light of possible alternatives.

Distribution guided by the spatial strategy

3.2 The spatial distribution of housing is guided by the spatial strategy for the Local Plan Review. Major strategic allocations for housing and other development are focused on the two main towns of Tiverton and Cullompton, with more modest development at Crediton and in the rural areas. Explanation for the spatial strategy is provided in the Council's hearing statement for Hearing 1 Issue 1.

Amount and distribution of new housing

3.3 Local Plan Review Policy S2 sets out the amount and distribution of new housing as follows:

Location	Total Residential (commitments and allocations; dwellings)	Proportion of overall development target
Tiverton	2,358	30%
Cullompton	3,930	50%
Crediton	786	10%
Rural areas	786	10%
Total	7,860	100%

- 3.4 The Council's Housing Topic Paper (**TPA01**) explains the amount and distribution of development in some more detail at paragraphs 1.7 to 1.9.

Soundness of the spatial distribution of housing

- 3.5 The spatial distribution of housing is soundly based.
- 3.6 The spatial distribution of housing is based on a spatial strategy that is **positively prepared** which seeks to meet the objectively assessed housing need for the district. The largest proportion of housing growth is focused at two of the largest towns and centres of population where housing need is concentrated, where there is existing infrastructure and where new infrastructure needed is capable of being provided, and where sustainable development can be achieved through there being the largest concentrations of retailing, employment opportunities, education and community facilities and transport provision.
- 3.7 The spatial distribution of housing is **justified** since it is based on the most appropriate spatial strategy, when considered against the reasonable alternatives and based on proportionate evidence. This evidence includes the findings of the Strategic Housing Land Availability Assessment (SHLAA – 2013 **HOU01b** and 2014 **HOU1h**) where land is found to be suitable, available and the allocations are **effective** in terms of being capable of being achieved, and also other technical evidence that has guided the location of site allocations. This is explained in more detail from paragraph 3.12 onwards, below, for each of the three main towns and the rural areas. Many of the land allocations for housing in the Local Plan Review are now being developed, have extant planning permission or are subject to planning applications currently being determined. Further information about the status of these sites is included in the appendices for the Council's Housing Land Supply Update (January 2019) which forms an appendix to the Council's statement in response to Hearing 1 Issue 5.

- 3.8 The spatial distribution of housing is based on a spatial strategy that is **consistent with national policy**. National policy advises that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (2012 NPPF core planning principles, paragraph 7, bullet 11). While the spatial distribution of housing is therefore concentrated at Cullompton (including a new community adjacent to Junction 28) and Tiverton, the Local Plan Review also makes provision for some housing at Crediton (10%) in rural areas (10%) where it can enhance or maintain the vitality of rural communities (2012 NPPF paragraph 55).

Possible alternatives for the spatial distribution of housing

- 3.9 Possible alternatives for the spatial distribution of housing were considered through the preparation of the Local Plan Review and have also been referred to in the Council’s hearing statement for Hearing 1 Issue 1 in relation to the Spatial Strategy.
- 3.10 The SA Update 2018 (**SA02**) has found reasonable alternative proposed strategies for the distribution of development (housing), including a rural distribution, a Tiverton and Crediton focus, a ‘Town Focus’ (including the allocation of Hartnoll Farm at Tiverton), and a new community adjacent to Junction 27 Willand to result in greater negative impacts on SA objectives. Further information can be found on pages 86 – 88, in the Summary Matrix – S2 Distribution of Development (page 95) shown below and in the Annex 3 Additional Reasonable Alternative Appraisals (pages 249 - 263) of the SA Update 2018 (**SA02**).

Summary Matrix - S2 ‘Distribution of Development’

Sustainability Objective	Preferred	Alternative			
	New Community (J28 Cullompton)	Tiverton and Crediton Focussed	Rural Distribution	Town Focus (Hartnoll Farm)	New Community (J27 Willand)
A	-1	-2	-2	-1	-2/?
B	0/?	-2/?	-2	-2/?	0/?
C	0/?	0/?	-1/?	0/?	0/?
D	-3	-3	-2	-3	-3/?
E	+3	+2	+2	+2	+3
F	+1/?	+2	+1	+2	-3/?
G	+3	+3	+3	+3	+3
H	0	+1	-2	+1	0
I	+2	+2	-2/?	+2	+2/?

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¹ SA objectives: A) Protection of the natural environment, B) Protection and promotion of a quality built and historic environment, C) Mitigating the effects of climate change, D) Safeguarding and minimising resource use, E) Promoting economic growth and employment, F) Supporting retail, G) Meeting housing needs, H) Ensuring community health and wellbeing, I) Delivering the necessary infrastructure

- 3.11 Further information about the testing and consultation outcomes on alternative options for the distribution of development as these have evolved through the preparation of the Local Plan Review can found on pages 32 -35 of the SA February 2015 (**SD04**) and pages 123 – 143 in the SA Appendix 2 (**SD04**).

Cullompton

- 3.12 The greatest proportion of housing development (50%) is at Cullompton. This is based on the availability of suitable land and community support for expansion, particularly to the west and to the east of the town, opportunities for transport improvements (new railway station) and proximity to Junction 28 on the M5 motorway and where there was significant community support for a new community.
- 3.13 Major mixed use sites allocations (including housing) to the west of the town take forward and extend similar proposals included in the adopted Allocations and Infrastructure DPD (**LDO02**) and which has been masterplanned (**SSE02**) and is part subject to current planning applications by developers. This land has been assessed through technical evidence in the SHLAA (report section **HOU01d**, pages 4 – 8).
- 3.14 The area to the east of Cullompton is now seen as comprising the first phase of the Culm Garden Village, which was designated in January 2017. This includes around 1,750 new homes, with scope for later phases of development to be considered through the emerging Greater Exeter Strategic Plan. This land has been assessed through technical evidence in the SHLAA (report section **HOU01d**, pages 63 - 66) and is capable of being developed. A Statement of Common Ground is being prepared with site promoters for allocated land east of Cullompton that provides greater clarity over matters agreed for development to come forward as set out in the Local Plan Review policies for the town. The Council is currently preparing a masterplan for proposed development to the east of Cullompton.

Tiverton

- 3.15 30% of the total housing provision is proposed at Tiverton. Although Tiverton is the largest settlement in Mid Devon there are fewer major sites that are capable of development.
- 3.16 A major mixed use allocation, including housing, to the east of Tiverton (Local Plan Review Policy TIV1 Eastern Urban Extension) carries forward land that is allocated for similar development in the adopted Allocations and Infrastructure DPD (**LDO02**). This land has been assessed through technical evidence in the SHLAA (report section **HOU01c**, pages 4 - 9) and is capable of being developed. The Eastern Urban Extension is subject to a current (**SSE01**) and proposed masterplan. 1030 of the allocated 1580 dwellings now have planning permission areas in the Council's Housing Land Supply Update (January 2019) which forms an appendix to the Council's statement in response to Hearing 1 Issue 5.
- 3.17 Further expansion of the town through major strategic allocations is constrained through physical and environmental constraints. This includes land at Hartnoll Farm (further east of the Policy TIV Eastern Urban Extension) which is proximate to the Grand Western Canal Conservation Area, would extend towards the village of Halberton and lead to coalescence,

and would result in the loss of almost 70 hectares of grade 1 agricultural land. Development at Hartnoll Farm has been rejected though the preparation of the Spatial Strategy for the Local Plan Review and is not needed to meet the Local Plan Review housing target. Land to the south and to the west of Tiverton is affected by topographical constraints. The Council has explored land availability to the north of the A361 and has received confirmation that this is not available. It would also be constrained as part of the setting of the Knightshayes Grade II listed park and garden (**ENV18**). The Inspector who examined the Core Strategy supported these conclusions in his report (**ED01**, paragraph 3.4.13) stating that ‘in terms of physical constraints there are fairly tight limitations to development to the south and west. To the north the North Devon Link Road provides a strong barrier, breaching of which would be a significant departure from previous approaches.’

- 3.18 The Local Plan Review includes provision for a number of smaller site allocations at Tiverton through policies TIV6 to TIV13. These have been found to be capable of development through the SHLAA (report section **HOU01c**) and some now have planning permission and are under construction.

Crediton

- 3.19 Crediton is the smallest of Mid Devon’s market towns. Physical constraints, including steep topography around the town and historic parklands, limit the options for developable sites. The Local Plan Review therefore makes provision for only 10% of the total housing provision at Crediton. Crediton is also an Air Quality Management Area where poor air quality arises through traffic congestion in the town centre, and is subject to an action plan (**ENV23**). However, the recent completion of the Crediton Link Road is likely to significantly improve air quality at the town and this will need to be monitored.
- 3.20 Local Plan Review policies CRE1 to CRE9 make provision for about 768 new houses at Crediton. These have been found to be developable through the SHLAA (report section **HOU01e**) and some are now being developed, have extant planning permission or are subject to planning applications currently being determined. This is detailed in the Council’s Housing Land Supply Update (January 2019) which forms an appendix to the Council’s statement in response to Hearing 1 Issue 5.

Elsewhere / rural areas

- 3.21 The Local Plan Review paragraph 1.16 makes clear that some provision in the more sustainable villages is proposed, “which meets local needs and promotes vibrant rural communities” (Policy S2), but a wider distribution of housing in these smaller settlements risks significant increases in unsustainable development and would be inconsistent with paragraph 30 of the 2012 NPPF. The Local Plan Review therefore makes provision for 10% of the development target for housing in the rural areas, on small sites where this will not harming character or putting undue pressure on local infrastructure.

- 3.22 Local Plan Review policy S13 designates 22 villages as suitable for limited development within defined settlement limits and to allocations, which can include small scale housing. This can help meet local needs appropriate to their individual opportunities. Paragraph 3.186 refers to twenty-one site allocations for housing with specific policies for each (Local Plan Review pages 132 – 150). These have been assessed as being capable of development through the SHLAA (**HOU01**). Many of these sites are subject to planning applications that have been approved or are being determined. This is detailed in the Council's Housing Land Supply Update (January 2019) which forms an appendix to the Council's statement in response to Hearing 1 Issue 5.
- 3.23 Policy S14 criterion a) sets out special circumstances where housing in the countryside may be permitted. Policy DM6 allows for development on rural exception sites for affordable and low cost housing to meet local needs or self-build proposal.
- 3.24 Opportunities for further growth in rural areas can be explored by local communities through the preparation of Neighbourhood Development Plans