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**From:** Jane Fuller  
**Sent:** 27 April 2015 14:18  
**To:** Local Plan Review  
**Subject:** Local Plan Review - Representation on Proposed Submission  
**Attachments:** 270415 Representation\_Mid Devon Local Plan Review\_Cover Letter.pdf; 270415 Representation\_Mid Devon Local Plan Review.pdf

**FAO: Local Plan Review**

Please find attached our representation on the Local Plan Review: Proposed Submission.

If you can please confirm receipt.

Kind regards,

JANE FULLER MRTPI  
PRINCIPAL

**ORIGIN3**



850

Origin3 Ref – 14-056

Local Plan Review Consultation  
Forward Planning  
Mid Devon District Council  
Phoenix House  
Tiverton  
EX16 6PP



27<sup>th</sup> April 2015

Dear Sir/Madam,

**RE. Local Plan Review Consultation: Land at Chapel Down Farm, Crediton**

Please find enclosed our representation on the Local Plan Review in respect of Land at Chapel Down Farm, Crediton.

We would also like to request the opportunity to be heard at the examination and to be notified at the contact details specified on this letter of:

- The submission of the Local Plan Review for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004 (the Act);
- The publication of the recommendations of the person appointed to carry out an independent examination of the Local Plan Review under section 20 of the Act, and
- The adoption of the Local Plan Review.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Colin Danks'.

Colin Danks  
Director  
[Colin@origin3.co.uk](mailto:Colin@origin3.co.uk)

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# Representation on Local Plan Review 2013-2033: Proposed Submission

Land at Chapel Down Farm, Crediton  
For Barratt Homes

27<sup>th</sup> April 2015

The logo for ORIGIN3 features the word "ORIGIN" in a bold, sans-serif font, followed by a large "3". The "3" is stylized with a grid pattern. The "O" in "ORIGIN" is a solid circle.

Planning . Design . Development

# Contents

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1. Introduction	3
2. Housing Needs, Supply and Distribution	5
3. Crediton Site Allocations	10
4. Conclusions	14

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# 1. Introduction

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- 1.1 We welcome the opportunity to provide feedback on the Mid Devon District Local Plan Review (2013-2033): Proposed Submission (hereafter 'the Plan'). We write on behalf of our client Barratt Homes and their interest in Land at Chapel Down Farm, Crediton.
- 1.2 The 'Land at Chapel Down Farm' site lies to the immediate west of Crediton, adjoining the settlement boundary with approximately 2.5 hectares lying within the settlement limits. The eastern part of the site borders the Queen Elizabeth Drive housing estate.
- 1.3 Crediton, along with Tiverton is identified as being the secondary focus of new development after Cullompton as the main strategic focus of new development in the district over the Plan period.
- 1.4 This site was previously considered as a potential Plan allocation for 120 units to assist in delivering the housing supply for Crediton. However the site has since been discounted following the Issues and Options consultation. We gather the reasons for this were principally due to a section of the site being grade 2 agricultural land as well as potential impacts on the setting of a listed building.
- 1.5 We understand that since the Proposed Submission Plan was published for consultation, the Strategic Housing Market Assessment 2014/2014 (SHMA) has also been made available. This report sets out the objectively assessed housing needs that underpin the Plan and our feedback has been prepared in the context of this report.
- 1.6 As detailed below, whilst we welcome the Council's proactive approach to addressing its housing needs over the plan period with the allocation of strategic extensions we wish to make the following points on the Plan's strategy:
  - The Plan should be positively prepared and aim to meet the upper end of the assessed housing needs range to support both housing delivery and economic growth.
  - The amount of new housing supply to be delivered overall through the Plan for both market and affordable homes will be insufficient to meet the area's needs as stated within the SHMA.
  - The Plan relies too heavily upon housing needs being met by the large Cullompton extension sites which have significant delivery risks attached.
  - The proportion of growth planned for Crediton (10%) is too low given the status of the town in the settlement hierarchy.
  - The reasons for discounting the Chapel Down Farm site are inconsistent with the approaches taking for other allocated sites.

- The Chapel Down Farm site has the potential to make a significant contribution to open market and affordable housing early in the plan process being unconstrained and of a modest scale.
- This site is in a sustainable location at the edge of the Crediton settlement and it should be reinstated within the Plan as an available and achievable site that could be delivered within the first five years of the Plan period.

## 2. Housing Needs, Supply and Distribution

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- 2.1 The following section provides a review of the housing needs as set out in the SHMA in relation to the housing delivery trajectory within the Proposed Submission Plan.

### Overview of Housing Needs

- 2.2 The Plan provides for a housing supply of 7,200 homes, averaging 360 homes per year over the 20 year plan period. Since the Plan was made available for consultation, the Council has published additional evidence to be taken into account including the Exeter Strategic Housing Market Assessment (2014/15).
- 2.3 The SHMA report addresses housing issues and establishes objectively assessed housing needs for the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge. Key findings of the SHMA are as follows:
- Significant population growth of 15% is projected across the HMA area with an increase of 68,600 persons from 2013 to 2033 with a total of 47,500 of these (over 69%) aged 65 or over indicating an ageing population profile.
  - The population increase is needed to support the likely additional jobs - 1500 extra jobs per year over 2013 to 2033 – which equates to the need for a population increase of around 85,000 extra people over the Plan period.
  - Across the whole SHMA area there is an objectively assessed need of between 2,172 and 2,601 extra new homes per year.
  - For Mid Devon, there is a housing need range of between 359-381 new homes per year with a mid-point range of 370 per year. This equates to a need for between 7180 and 7620 new homes with a mid-point range of 7400 new homes over the 20 year Plan period.

### Mid Devon Housing Issues

- 2.4 For Mid Devon District, the SHMA identifies the following key trends for the district that are relevant to the consideration of future housing supply:
- The main migration flows (identified between 2010 and 2011) are between Mid Devon and Exeter with a net in-flow of 240 people. There was a net out-flow of people to Taunton Deane (200). Overall the in and out migration was fairly balanced with 1,600 people in-migrating and 1,500 out-migrating therefore a net inflow overall.
  - The majority of the migration moves (72.5%) were local with the remainder migrating from outside of the local area.

- Place of work data shows that since 2008, less Mid Devon residents work within the district than previously (decrease from 76.4% in 2001 to 75.5% in 2008). However there has also been a slight increase in residents living in East Devon and Exeter travelling to work within the district since 2001.
- According to a 2009 South West Regional Assembly study, Mid Devon had the highest proportion of non-decent homes in the SHMA area of 43% which is significantly higher than the South West proportion of 22% suggesting housing stock condition is an issue for the area.
- In relation to the Duty to Cooperate, the assessment group can be classed a Housing Market area and as such in order to comply with the duty Mid Devon will need to demonstrate through the examination process that it has engaged actively in strategic cross-boundary matters with the other authorities.

2.5 These points above indicate that the population of the area is set to significantly grow over the plan period in line with demographic trends and provision of new jobs. Appropriate provision of housing is critical to support the area's economic growth strategy and to be able to attract and enable new workers to live locally thus reducing unsustainable travel patterns.

#### Affordable Housing Needs

- 2.6 Total affordable housing needs are 955 per year across the whole SHMA area. The report identifies that a shortfall of affordable homes against need are being planned for and refers to National Planning Practice Guidance (paragraph 029) where it states that "*An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes*" (paragraph 11.1.12).
- 2.7 In terms of affordable housing, SHMA Table 11-3 'Affordable Need and Likely Delivery' indicates a need for 124 homes per year to be supplied in Mid Devon. It indicates that 111 are likely to be delivered through policy requirements leaving a shortfall against needs of 13 homes per year equating to 260 over the Plan period assuming all targets are met.
- 2.8 It is recommended that the Plan is further scrutinised to ensure the appropriate level of affordable housing is planned to be viably delivered. The site, if included, could provide an important contribution towards this. Paragraph 11.1.14 of the SHMA recommends that "*the authorities of the HMA will need to give consideration to the scope and potential to increase total housing delivery, above objectively assessed needs, as a means to promote additional affordable housing delivery*".

#### Housing Supply and Distribution through the Local Plan

- 2.9 The Plan states that there is a housing requirement of 7,200 homes across the district, averaging 360 homes per year. Taking in to account completions (320) and commitments (1369) as of 31<sup>st</sup> March 2014 there was an uncommitted requirement of 5511 new homes.



- 2.10 As it currently stands, the Plan is providing for an average of 360 homes per year which is at the lower end of the needs range as stated in the SHMA. Taking the 370 per year mid-point of the needs range in the SHMA, if the Plan's annual targets are met there would be a shortfall of around 200 homes over the 20 year period. At the SHMA's higher needs range of 381, there would be a shortfall of provision against needs of 420 homes.
- 2.11 The Plan states at 2.7 that a 10% buffer is planned in to the housing delivery figures. If this is the case then taking into account the SHMA's recommendations the 5 year supply requirement should be increased to 1890 based on the Mid-point range (370) and with the 10% buffer this would equates to 2079 homes. Based on the upper end of the needs range of 381 per year, the figure should be increased to 1945 and with 10% to 2140.
- 2.12 It is recommended that the overall housing numbers are readjusted in light of the SHMA to ensure that the Plan is positively prepared and that needs will be met in accordance with para. 47 of the NPPF which states that local authorities should:

*"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period".*

#### Distribution of Housing Supply

- 2.13 The vast majority (80%) of new housing supply is being directed towards Cullompton (taking 50% of new housing) and Tiverton (30%) with Crediton (the same settlement category as Tiverton) and the rural areas delivering a further 10% each. For Crediton this translates to a requirement for 720 new homes over the Plan period with an uncommitted requirement of 446 new homes which does not reflect its position in the settlement hierarchy.
- 2.14 Page 11 of the Plan states that both Tiverton and Crediton are identified as being the secondary focus of new development. It is considered that the 10% for Crediton is a low proportion of the total supply which has the two-fold effect of increasing pressure on the large urban extension projects in Cullompton which will hold significant delivery risks as well as diverting development to smaller rural settlements which may promote unsustainable travel patterns and have a greater risk of not being delivered in line with the trajectory. The 'Statement of Consultation Before Publication' report acknowledges this and states that :
- "the total housing target for Crediton represents 10% of the district's total requirement. This is lower than might be expected for a town of this size".*
- 2.15 The Plan acknowledges at 1.16 that *"the wider distribution of housing in these smaller settlements risks significant increases in unsustainable travel"*. Furthermore the trajectory within the Plan shows that the five year land supply currently relies upon 193 units (made up of small sites between 5 and 12 units) coming forward in 2017/18 and a further 123 units in 2018/19. If achieved, the 193 units would be a significant increase on the housing numbers delivered in previous years as indicated by the commitment figures for the last two years of 82 and 144 units per year for these rural areas.

- 2.16 In accordance with national guidance development should be targeted towards supporting existing communities so it seems surprising that the rural sites are apportioned with the same amount of housing supply as Crediton. Para. 55 of the NPPF states that:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances."*

### Risks to Housing Delivery

- 2.17 At a strategic level the Plan's housing supply relies strongly on the timely delivery of homes at the two Cullompton Urban Extension sites with the first homes to be completed on the north-west site during 21018/19. Based on our experience, large master planned development processes of this nature can take a considerable amount of time to reach fruition and carry significant delivery and viability risk. This is particularly the case if there multiple land ownerships involved. For example several of the Tiverton Eastern Urban Extension sites that were previously allocated within the Core Strategy relying on delivery on site by 2014/15 have now been pushed further back in the delivery trajectory.

- 2.18 The 'Strategic Highways Options Report' (2014) states in relation to the East Cullompton Urban Extension:

*"Of these, the new M5 junction north of Duke Street Bridge provides the greatest capacity. However, the impacts on this scheme on the town centre are yet to be considered and there remain significant question marks around the deliverability of the scheme."*

- 2.19 This indicates there are still significant questions over the details of this masterplan and the delivery and viability implications of the supporting infrastructure that will be required. The inclusion of other additional medium sized sites that could be brought forward earlier in the plan period, such as our client's site at Chapel Down Farm, could reduce the risks of speculative planning applications if the urban extension sites face delays or setbacks.

- 2.20 Trends in historic net completions for the SHMA area are summarised in Table 9-4 'Net Completions' (2007-2014). This table shows that taken as whole the SHMA area has delivered a shortfall of homes compared with targets. Mid Devon shows a 79 unit surplus against targets over this period. However this is due to the significantly higher supply in the pre-recession years (06/07, 07/08, 08/09) which have then significantly dropped off from 09/10 onwards.

- 2.21 Between 2010/11 and 2013/14 an average of 279 units per year have been completed. The Plan relies upon housing delivery to significantly increase to an average of 456 units per year over the next five years (2014/15 to 2018/19). Given the strong reliance on market conditions to deliver these numbers, it would seem sensible to include medium-sizes sites that are already being promoted that have a strong chance of being delivered.

2.22 Rather than take the risk of relying upon a review of the Local Plan at a later date (which in itself takes significant time, public cost and resources to prepare); the Plan should be positively prepared at the outset. The Plan should be flexible enough that it does not need to rely on only a couple of key sites when there are other achievable sites that could also be included.

### 3. Crediton Site Allocations

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3.1 This section provides feedback on the site allocations process and commentary of the sites that have been chosen over and above the Chapel Down Farm site to be promoted through the Local Plan.

3.2 There are eight housing allocations now promoted for Crediton through the Plan. Together with commitments of 274 units, a total of 907 units are proposed over the Plan period. The allocations are:

- Wellparks (185 units)
- Cromwells Meadow (35 units)
- Woods Group (8 units)
- Pedlerspool (200 units)
- Sports Fields (120 units)
- Stonewall Lane (50 units)
- Land at Barn Park (20 units)
- Alexandra Close (15 units)

3.3 Land at Chapel Down Farm was previously included as an alternative site for consideration under Policy CRE11 at the Issues and Options Consultation stage where it was identified for potentially 120 dwellings. The policy stated:

*“A site of 10 hectares at Chapel Down Farm could be allocated for residential development subject to the following:*

- a) 120 dwellings with 35% affordable housing.*
- b) Access to the eastern part of the site to include substantial improvements to Higher Road, and any access onto the A377 to include improvements to provide pedestrian facilities connecting the site to the town.*
- c) Archaeological investigation and appropriate mitigation*
- d) Provision of a sustainable urban drainage scheme to deal with all surface water from the development and arrangements for future maintenance.”*

3.4 The final list of site allocations for Crediton was discussed at a Cabinet meeting held on 27<sup>th</sup> November 2015. In relation to considerations over Chapel Down Farm, the Cabinet report stated that (O3 emphasis):

*“Chapel Down Farm is not favoured as the northern portion of the site is Grade 2 agricultural land and Chapel Downs Farmhouse is a listed building which sites adjacent to the site. Development of the surrounding agricultural land will further impact on the setting of the building, with the potential to reduce its significance.”*

3.5 The site allocations for Crediton were appraised through the Sustainability Appraisal (SA) process. Key sections of the SA commentary are important to understanding why the Chapel Down Farm site was subsequently excluded. The site was appraised under alternative site options as follows:

3.6 **Historic environment:** The SA states that (O3 emphasis):

*"The Chapel Downs Farmhouse is a listed building which sits adjacent to the site. The farm complex would once have been more separate from the town, but over the years residential growth has brought the site within Crediton's urban fringe. Development of the surrounding agricultural land will further impact on the setting of the building, with the potential to reduce its significance."*

The mitigation commentary then states that: *"Overall, however, development of the site has the potential to slightly negatively impact on the historic environment".*

3.7 It is considered that having a 'slight', potential impact on a rural listed building which has already been brought within the urban fringe should not be a significant material consideration given that this impact would be mitigated through careful layout through the planning process and appropriate conditions attached in the usual way. Policy DM25 of the Plan clearly accommodates for new developments to be able demonstrate their ability to mitigate any significant impacts on heritage assets through the planning process.

3.8 Furthermore the Wellparks allocation (for 185 dwellings) also has a provision that it needs to 'protect the setting of Downes Historic Park and Garden and respect the character and setting of the listed building at Wellparks and Downes House' as detailed at paragraph 3.157. Therefore, in certain circumstances the proximity to a listed building has not been considered a reason to discount the allocation and the approach is therefore inconsistent.

3.9 **Ensuring community health and wellbeing:** The SA states that from the site *"the town services are walkable, but some are a distance from the site."* However in the Options report it is stated that the site was not well connected to the town. In the SA it states that it is walkable and is awarded a neutral score compared with the main allocation of Pedlerspool which scores negatively under this point.

3.10 **Promoting economic growth and employment:** The SA states that the policy contains *"no commercial development proposals"* which would have given it a higher score for economic development. Notwithstanding this, there are a number of other housing only allocations proposed at Crediton which the Council consider are sustainable enough to allocate without requiring them to provide a mixture of uses.

3.11 More importantly there are other sites that have been allocated in Crediton which share similar (and in some cases more significant) constraints and offer greater risk in terms of early delivery. As such the discounting process does not seem to have been consistent between locations. In particular almost all the allocations have been focussed towards the east of the centre where there are significant landscape, habitat and flood plain constraints.

### Policy CRE5: Pedlerspool, Exhibition Road

- 3.12 Along with Wellparks, the Pedlerspool site is set to deliver the majority of housing need for Crediton (200 homes) with the first phase of homes planned to be on site by 2017/18. This site was previously considered a contingency site in 2010. 98% of this site comprises grade 2 and grade 3 agricultural land with over a quarter of the site falling with flood zones 2 and 3.
- 3.13 Other significant environmental constraints on this site include the north eastern part of the site (11.6ha approx.) being a priority habitat 'coastal and floodplain grazing marsh'. The site is adjacent to a Deciduous Woodland Priority Habitat and a Wood pasture and Parkland Priority Habitat on the north western boundary, across the road. It is also acknowledged that the development of the site could have a significant impact on the landscape of the area. The site is stated in the SHLAA (2014) as having a "somewhat divorced nature" from Crediton and that a new primary school site may be required to support its delivery.
- 3.14 The SHLAA states that the site is not currently being marketed and the landowner's estimate of development time is 6-7 years (i.e. circa 2020/21 assuming 2014 start year). We also understand that there were significantly more public objections to the development of this site through earlier rounds of consultation than were received on the Chapel Farm site. It therefore seems inconsistent that this site which has greater environmental constraints and potential delivery risks has been included as a key delivery site whilst a similar size site that is deliverable has been discounted.

### Policy CRE3: Cromwells Meadow

- 3.15 This site is identified as delivering 12 units ready for take-up in 2017/18 and a further 23 the following year. The policy acknowledges that this site lies partially within the flood plain. The SHLAA 2014 (New Sites/Larger Sites/Reconsidered Sites) acknowledges the following environmental constraints for this site:
- Grade 3 agricultural land;
  - adjacent to flood zones 2 and 3;
  - anecdotally site has been known to flood;
  - risk of ground water flooding;
  - it lies within an area of archaeological potential;
  - part of the north east corner is priority habitat 'floodplain grazing marsh' ;
  - a large number of immature trees which 'could harbour a variety of biodiversity'; and
  - will have an impact on the Crediton Air Quality Management Area.
- 3.16 In accordance with the NPPF, the aim of the Sequential Test through local plan-making should be to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

3.17 The SHLAA also states that the site is not currently being marketed and the landowners estimated development time would be two years. Given there is not currently an application in place on this site, it is unclear how the 35 units will start to be delivered on site by 2017/18.

#### **Policy CRE6: Sports fields, Exhibition Road**

3.18 Redevelopment of sports fields is proposed to deliver 120 dwellings at Crediton subject to finding an alternative site and relocating the Rugby Club. In accordance with the NPPF (paragraph 74), in order for this development to take place the tests for building on playing fields will need to be met and the appropriate approvals gained by Sport England. The Plan's trajectory identifies homes to be on site by 2019/20 for this site. This is not entirely unrealistic however clearly there is a risk attached to relying on a playing field site which does not yet have a confirmed replacement location and the necessary approvals in place. There will also be impact of loss of recreational space for the local community that uses the site.

3.19 The site referred to as 'Land at Stonewall Lane' was previously discounted from the process with one of the reasons given that this would result in the loss of a playing field. It is not clear from the evidence base and review of the Open Space Strategy whether there is sufficient surplus land to be able to accommodate new replacement playing fields within Crediton.

#### **Sustainability Appraisal – Overall Scoring**

3.20 On review of the SA of Policy S12, land at Chapel Down Farm achieves an equal or higher overall sustainability score than 4 of the 9 sites that have since been allocated. Furthermore the appraisal states that the preferred option for Crediton should be to "*Meet Housing Need*" whereas the Plan has opted for a figure that is slightly below the identified needs in the SHMA.

3.21 Whilst the constraints and challenges of providing housing in Crediton are acknowledged; it does appear that the main sites are being relied upon to deliver housing within the next five years at the town are subject to greater environmental constraints, delivery challenges and highway impact risks than the site at Chapel Down Farm. On that basis land at Chapel Down Farm should form part of the plan as a housing allocation.

## 4. Conclusions

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4.1 In conclusion, for the reasons set out above, we recommend that Land at Chapel Down Farm is reconsidered for inclusion as a site allocation for Crediton for the following reasons:

- The Plan should be positively prepared and aim to meet the upper end of the assessed housing needs range to support both housing delivery and economic growth.
- The planned number of homes is insufficient to meet the objectively assessed needs as set out within the SHMA and the trajectory is heavily reliant upon a small number of large sites with significant delivery risks and environmental constraints to be overcome.
- The reasons that this site has been discounted do not appear to be defensible given that other sites that have been promoted through the Plan share similar and in some cases more significant environmental constraints, in particular flood risk.
- This site is in a sustainable location at the edge of the settlement and subject to putting certain mitigations in place, it can be considered deliverable and achievable within the early part of the Plan period.
- The site has the potential to make a significant contribution to meeting local open market and affordable housing needs.