# 1517/TH1 1517/513 1517/OTH2

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From:

Local Plan Review

**Subject:** 

FW: Mid Devon Local Plan Review Proposed Submission (Incorporating proposed

modifications) consultation

Attachments:

Land to the north east of Silver Street, Thorverton.pdf; Site A Plan to east of New Estate, Sweetham, Newton Saint Cyres Site A.....pdf; Site B Plan land east of New Estate,

Sweetham, Newton Saint Cyres.pdf; Plan Land West of Lynch Close and Cleaves Close.pdf; Thorverton Site Layout Plan.pdf; Thorverton Site Location Plan.pdf; 14.2.17

CCE Mid Devon Reps Covering Letter.pdf

From: Hoban, Jonathan (UK - London)

Sent: 14 February 2017 16:41

To: Local Plan Review

Cc: Coldicott, Josh (UK - London); Wright, Matthew J (UK - London)

Subject: Mid Devon Local Plan Review Proposed Submission (Incorporating proposed modifications) consultation

Dear Sir/Madam

Please find attached our representations in relation to the Mid Devon Local Plan Review Proposed Submission (Incorporating proposed modifications) consultation.

I have also attached the site location plans which are referred to within the representations and the proposed site layout plan for Thorverton demonstrating that the site is deliverable and suitable for 16 units.

I would be grateful if you please confirm receipt of the attached.

Kind Regards

Jonathan

#### Jonathan Hoban

Manager | FA - Advisory Corporate Finance | Deloitte LLP Athene Place, 66 Shoe Lane, London, EC4A 3BQ

www.deloitterealestate.co.uk



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14 February 2017

Local Plan Review Consultation Forward Planning Mid Devon District Council Phoenix House Tiverton EX16 6PP Deloitte LLP Athene Place 66 Shoe Lane London EC4A 3BQ

Phone: Fax: www.deloitte.co.uk

Direct phone:

Dear Sir/Madam,

# Local Plan Review Proposed Submission (incorporating proposed modifications) Consultation Representations on Behalf of the Church Commissioners for England

#### Introduction

We write on behalf of our client the Church Commissioners for England (the Commissioners) which manages a well-diversified investment portfolio to support the Church's work across the country and is a long-term landowner in the Mid Devon district. We understand that the Council are currently consulting on the Local Plan Review Proposed Submission (incorporating proposed modifications).

The Local Plan Review Proposed Submission (incorporating proposed modifications) aims to guide development in the district and aims to ensure that new homes, jobs and services are located in the most sustainable places.

The Commissioners has previously submitted representations to the Mid Devon District Proposed Submission Local Plan and has held pre-application discussions with the Council over the new local plan and is supportive of its adoption.

Specifically the Commissioners is supportive of Policy TH1 which allocates 0.7 hectares of land for the development of 12 dwellings, although it was agreed during pre-application discussions with the Council that housing should be for 16 units. This is addressed below.

### **Policy TH1 South of Broadlands Thorverton**

The site was first submitted for consideration in the Strategic Housing Land Availability Assessment (SHLAA) and it represents an appropriate and logical extension to the existing settlement boundary. The Commissioners reaffirms that the site has no significant constraints and is immediately deliverable and available, and can make a valuable contribution to supporting services and facilities in Thorverton. A draft planning application has been prepared addressing part b) and part c) of Policy TH1 and will be submitted imminently, demonstrating the sites deliverability.

Notwithstanding the Commissioners support for this draft allocation, the Commissioners has held preapplication discussions with Mid Devon District Council where it was agreed that the site is suitable for

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accommodating 16 units. The Council agreed that the site represents a suitable sustainable location to boost the supply of homes in Mid Devon. A public consultation event was also held.

It is noted that the Local Plan Proposed Submission (incorporating proposed modifications) outlines that housing allocations in rural areas are expected to deliver around 20 dwellings per hectare, due to the low density character of existing village development. It states that in some cases, however, a higher or lower density may be justified. Accordingly, Policy TH1 sets out that the site could deliver 12 units, based on a developable area of 0.56 hectares and a density of 20 dwellings per hectare. It is noted that the Site area is 0.68 ha, and therefore at 20dph this represents 14 units.

However, as the Site has no significant technical constraints and in the context of the density of the surrounding built development, we consider that it has the potential to accommodate a higher density of development. The design process has assessed the opportunities and constraints of the Site, and the attached illustrative masterplan outlines that it could accommodate a well-designed development that delivers up to 16 units. This is based on a density of 26.47 dwellings per hectare.

Given the Council is keen to boost its housing land supply, the proposed level of development will maximise delivery of market and affordable housing and make a valuable contribution to the Council's 5 year land supply target. This approach will also ensure compliance with Paragraph 47 of the NPPF, which outlines local planning authorities should boost significantly the supply of housing.

The proposed development has been designed to be a high quality sustainable development which will have a positive economic, social and environmental impact on Thorverton and the surrounding area.

### Policy S13 - Villages

CCE consider that this policy should be amended to identify the role of appropriately located edge of settlement boundary land in instances when the Council is unable to demonstrate a five year supply of deliverable housing land. The new Housing White Paper – Fixing Our Broken Housing Market states that policies in plans should allow a good mix of sites to come forward. It recognises that small sites create opportunities for smaller developers and help meet rural housing needs which are sensitive to their setting.

Whilst it is acknowledged that the Council are allocating sufficient sites to meet its housing target, it has identified that there are a number of contingency sites that could come forward if delivery is not meeting the expected levels or a five year supply of land cannot be demonstrated. Paragraph 2.11 – contingency sites, identifies that there are 'reserved' sites that will be the Council's preferred location in the above scenarios. However the supporting text also identifies that proposals on other sites will be considered on their merits according to the presumption in favour of sustainable development.

It is considered that Policy S13 should reflect the text in paragraph 2.11 and in the circumstances specified above, land adjacent to existing settlement boundaries may be appropriate for development. This would be to meet a shortfall in supply or delivery and proposals would be considered on their merits according to the presumption in favour of sustainable development.

### **CCE Landholdings**

As identified previously CCE own a significant amount of land in the District that could potentially be brought forward for development should there be an identified need. In this context, CCE suggest that the Council should consider the sites in Thorverton and Newton St Cyres, which are outlined below. We can confirm the sites have no significant constraints and are immediately available and deliverable.

• Land to the north east of Silver Street, Thorverton. The site measures approx. 0.35 ha.

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- Land to the west of Lynch Close and Cleaves Close, Thorverton. The site measures approx 1.32 ha
  and was submitted to the 2014 Mid Devon SHLAA (the SHLAA submission is enclosed with this
  letter);
- Land to the east of the New Estate, Newton Saint Cyres Road, Newton St Cyres (site A). The site measures approx. 1.4 ha and was submitted to the 2014 Mid Devon SHLAA (the SHLAA submission is enclosed with this letter);
- Land to the east of the New Estate, Newton Saint Cyres Road, Newton St Cyres (site B). The site
  measures approx.1.3 ha and was submitted to the 2014 Mid Devon SHLAA (the SHLAA submission is
  enclosed with this letter).

### **Summary**

In summary, the Commissioners is pleased to have the opportunity to provide comments in relation to the consultation on the Local Plan Review Proposed Submission. The Commissioners supports the aims and objectives of the local plan, and policy TH1, however it considers that the site could accommodate a higher development density to ensure efficient and effective use is made of the site and this has already been agreed through pre-application discussions with the Council.

The Commissioners also considers that further text should be included in Policy S13 to recognise that in instances that the Council cannot identify a sufficient five year supply of land or have not met its delivery targets that land adjacent to settlement boundaries could be considered for development. The acceptability of this land would be considered in accordance with the principle of sustainable development.

Should you have any queries on this correspondence, please contact me on 0207 007 6831 or jhoban@deloitte.co.uk.

Yours sincerely,

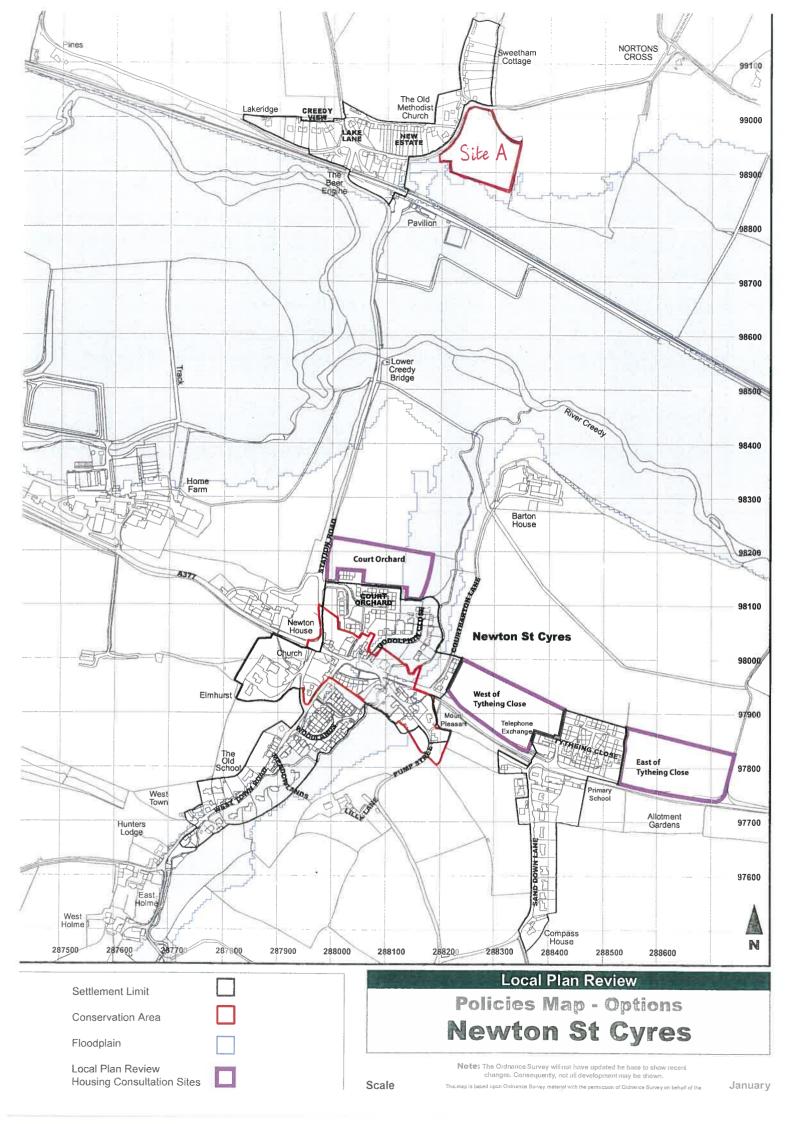


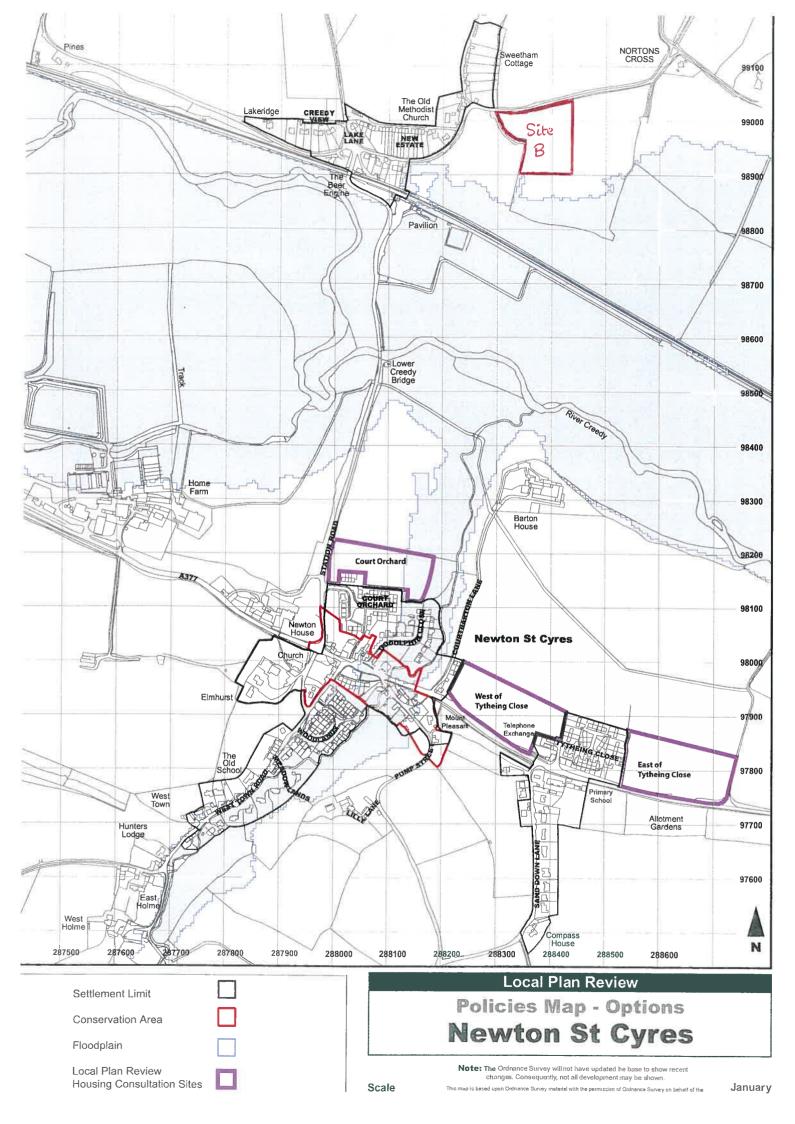
Jonathan Hoban For Deloitte LLP

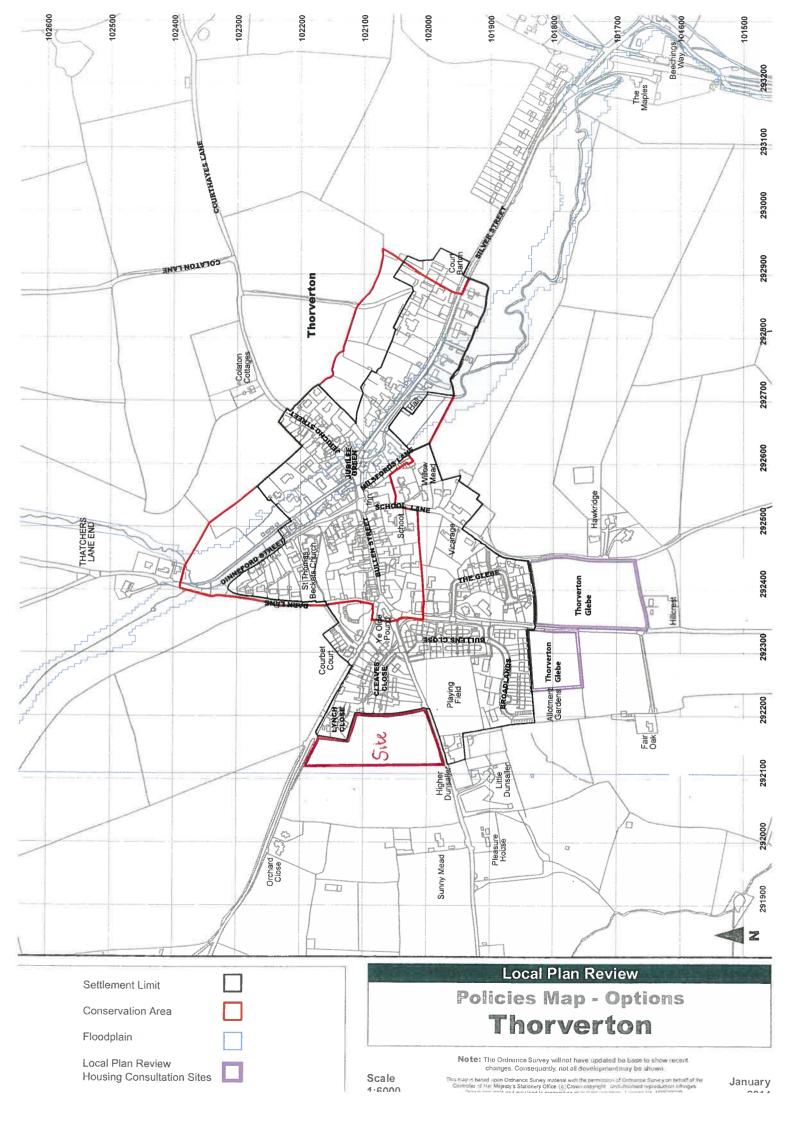
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Land to the north east of Silver Street, Thorverton







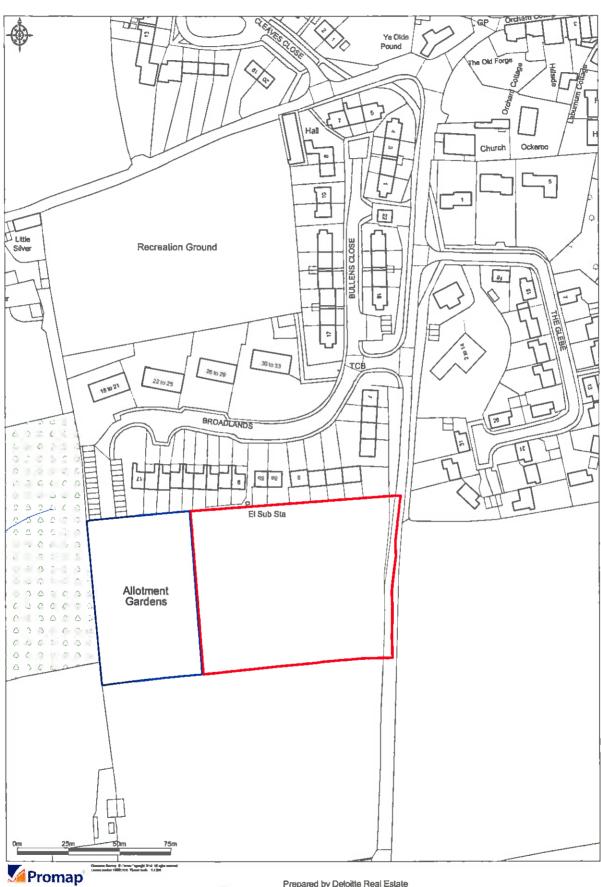


the church commissioners broadlands site, thorverton, devon site plan arrangement drawing 15061 - SK07 february 2016 - scale: 1:500









Prepared by Deloitte Real Estate