

4675/SZ/Mod

4675/CU19

4675/TIV1-TIV5

4675/CU7-CU12

4695/S10/Mod

4675/OTIV2

4675/S13

From:
Subject:
Attachments:

Local Plan Review
FW: Mid Devon Local Plan Review Consultation - Representations
10-02 Local Plan Reps.pdf; 141102 L 01 01 E Location Plan.pdf

4675/OHENEN

4675/OC01

4675/S12

4675/DEVSTRA/MOD

4675/J27/MOD

4675/TIV16/MOD

4675/S3/MOD

4675/CU21

From: Nicole Stacey
Sent: 10 February 2017 16:49
To: Local Plan Review
Cc: Sarah Smith
Subject: RE: Mid Devon Local Plan Review Consultation - Representations

Dear Sir/ Madam,

I write further to my earlier email. Unfortunately I forgot to attach a file to accompany our letter of representation – please find attached both of these documents to this email for sake of completeness.

Again, I would be grateful if you could please confirm receipt of this submission.

Kind regards,

Nicole

Nicole Stacey BSc (Hons) MSc MRTPI
Associate Director

PCL PLANNING LTD

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From: Nicole Stacey
Sent: 10 February 2017 13:54
To: 'localplanreview@middevon.gov.uk' <[REDACTED]>

Cc: Sarah Smith [REDACTED]
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I would be grateful if you could please confirm receipt of these representations.

Kind regards,

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Our Ref: PCL/NS/9885
Date: 10th February 2017



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

Dear Sirs,

LOCAL PLAN REVIEW PROPOSED SUBMISSION CONSULTATION

We write on behalf of our client, Waddeton Park Ltd, who have land interests in Mid Devon District. We set out representations on our client's behalf in response to the *Local Plan Review Proposed Submission Consultation* (January 2017). This letter is one of several separate representations that will be submitted on behalf of Waddeton Park Ltd.

Amount and Distribution of Development – Policy S2

Our comments on the previous submission draft advocated growth of “at least” 7,800 dwellings up to 2033. We note that **Policy S2** increases the number of dwellings proposed, when compared with the earlier draft, and now proposes 7,860 dwellings up to 2033 (albeit para 2.4 states that the Plan will allocate 10% more housing than is required, to provide flexibility and account for unforeseen circumstances that might prevent some sites from coming forward as expected). We welcome this. Although it must be recognised that this figure is not a ceiling to growth, and as such the policy should read “at least” 7,860.

What pattern of growth is both sustainable and deliverable?

It appears to us that the key decision facing the Council is where to allocate significant new development. Mid Devon have assessed two possible options for delivering the quantum of development suggested:

- A town focus (i.e. Cullompton, Tiverton and Crediton)
- A new settlement

Mid Devon has decided to pursue the new settlement option. It is no surprise that the idea of a new settlement is the option that has raised the least objection, as typically urban extensions are opposed by those who perceive that they may bring change to their locality.

We remain surprised that this concept is being given serious consideration by the Council. This is because a new settlement in Mid Devon is not a strategically sound proposal. Mid Devon is largely rural in character and whilst it falls within the sphere of influence of both Exeter and Taunton it does not of itself directly need to provide any housing to meet the needs of these settlements.

We believe that development should be focussed at the main towns and larger villages within the district as this is the most sustainable option. The existing adopted Local Plan states that development in and adjacent to the main towns is the most sustainable way of providing for both housing and economic growth, as the main towns offer the greatest level of services and facilities, opportunities for both existing employment provision and attracting new businesses. This urban concentration strategy ensures that distances between houses, services and jobs are shorter, which reduces reliance on the car and allows those without a car, access to services and employment.

A town focus approach strongly accords with the core planning principles set out in the National Planning Policy Framework (referred to as 'the Framework' from here on). Specifically, the importance of focussing housing development in locations accessible to the main centres with economic growth potential both reduces overall travel needs and maximises the scope for the fullest use of public transport, walking and cycling. The larger towns and villages in the district offer the greatest potential to achieve this, due to their greater size and

the economies of scale that this offers in terms of offering employment and services in the same settlements.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. It therefore follows that the strategic option with the best sustainability credentials must surely be the preferred option.

Whilst a New Community may seem attractive to some, largely as it would divert development away from other towns, it is not a realistic option. In order to be self-sustaining, a new community would need to comprise a far greater number of houses than that currently proposed, and a figure far higher than could be sensibly allocated in one location over the plan period.

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Experience and evidence demonstrates that:

- i. New settlements are only viable if they have a sufficient critical mass. There is experience of this in the south east and it is locally evident that both new settlements that were proposed in the Devon Structure Plan First Review 1995-2011 (adopted February 1999) proved to be non-viable without significant public funding. Both Sherford and Cranbrook were allocated at a far greater number of dwellings than are proposed at the 'Cullompton New Settlement.'
- ii. A new community would require very significant upfront investment in new infrastructure, facilities and core services. It is now evident that both the Government and the Council accept that the new settlement is not viable without public sector funding.

The key transport infrastructure requirement necessary to accommodate the increased traffic generated by the new community at Cullompton is an improvement to J28 of the M5. The only option which appears to work in terms of capacity is a new junction 28A with south facing slip roads (north facing slip roads cannot be constructed as they would be too close to junction 28 to comply with standards). The cost estimate for this scheme currently stands at £120 million. This will prove difficult to fund and is far greater than the cost of the Tiverton link road and relies on an estimated twenty parties.

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- iv. Neither of the Councils (East Devon District Council and South Hams District Council) that have opted for a new settlement is in control of its housing supply position. South Hams is unable to demonstrate a 5 year supply of deliverable residential land and East Devon's supply is also at risk, in part, because of this lack of control. As a result, both Councils are at risk of appeal and the associated risk of costs being awarded against them.
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This is deliberate and ensures that the need to travel is minimised and public transport is an attractive choice between the new settlement and its companion city. The situation is very different in a rural area like Mid Devon. Cullompton is a small market town and is not appropriately located (nor serviced) to provide a sustainable option for growth of this order (as recognized in the existing Core Strategy, paras 7.51 and 7.53, page 44).

- vi. New settlements are inherently less sustainable than urban extensions. They normally require new infrastructure provision that is not necessary with urban extensions that simply require upgrading and improvements to existing infrastructure. Such improvements normally benefit existing residents. This is why, in previous Government guidance (PPG3), the sequential test process placed new settlements as 'the last stop on the line'.

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The concept of the new settlement is predicated on the claim that the existing towns cannot accommodate the level of growth required to allow for a continuing urban concentration. This is patently not true.

The notion that the required housing growth levels can only be met through the provision of a new settlement is fundamentally flawed. **Policy S2** sets out the proposed distribution of the dwellings required up to 2033. The distribution is as follows:

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Tiverton	30%
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Crediton	10%
Rural Areas	10%
Total	100%

The above distribution is largely predicated on the flawed assumption that Tiverton cannot accommodate a greater proportion of growth up to 2033, and that as a result Cullompton must become the key location for new development over the next 20 years (accommodating about half of the housing and commercial provision), with Tiverton taking a reduced proportion (about 30%). We contend that the distribution below can be satisfactorily accommodated (based on 7,860 dwellings). As such, the entire premise behind the new settlement is flawed, unjustified and unnecessary.

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It is plain that urban extensions to the main settlements that currently exist in Mid Devon are more sustainable than the proposed new settlement.

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The previous stage of the Local Plan Review identified a number of potential housing sites in Tiverton, these totalling well in excess of 3,000 dwellings. In our view, this demonstrates that the required number of dwellings could (and should) be met without the need for the proposed East Cullompton new settlement (**Policy CU7**).

We strongly support the retention of the Eastern Urban Extension (**Policy TIV1**), as it represents a sustainable and effective means of delivering the long term housing needs of the town. Our clients are part of the consortium that worked in partnership with Mid Devon District Council, Devon County Council, statutory bodies and key local stakeholders in order to deliver an adopted masterplan for the site. Outline proposals have since been submitted and there can be no question regarding the commitment to deliver the urban extension in a timely fashion.

Additionally, we continue to propose that a key component in the delivery of a town focus strategy should be a further urban extension to the east of Tiverton at Hartnoll Farm/Hartnoll Park. Separate representations, which specifically deal with Hartnoll Park, will be submitted on behalf of Waddeton Park Ltd

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We broadly support Policy 13 (Rural Areas) and the 22 settlements identified as being able to accommodate growth. We believe that these 22 villages are able to deliver the number of dwellings required, although it must be recognised that some of the villages are better positioned to accommodate growth, due to their level of service provision and sustainability credentials.

Hemyock and Copplestone are two such settlements that are capable of accommodating a larger proportion of growth than a number of the smaller villages.

Hemyock is the largest village on the Blackdown Hills (2011 Census population of 1,519). The settlement is located approximately five miles from the town of Wellington. The village expanded substantially in the latter half of the 20th century and has a range of services including shops, village school, sports facilities/ open space, post office, public house, church and medical facility. Hemyock is therefore well placed to assimilate further growth.

A planning application (ref. 16/01772/MOUT) for 40 dwellings and associated infrastructure on land to the north of Culmstock Road, Hemyock has been supported by the Parish Council and is being referred to planning committee for determination shortly. The site lies on the western side of Heymock between Culmstock Road and the SWW Sewerage Treatment Works and comprises a logical extension to the village. The proposed development will provide a mix of both market and affordable housing; public open space and landscaped areas as well as new and improved pedestrian and cycle connections.

Copplestone is a large village with a population of approximately 1,253 (2011 census) and lies approximately 4 miles from Crediton and 11 miles north west of the major urban centre of Exeter. The village benefits from a range of services and facilities which are largely situated in the village core including primary school, public house, church, post office, store and garage.

Copplestone also has a railway station that provides good services to both Exeter and Barnstaple. The village also benefits from regular bus services running Monday to Saturday to and from Exeter, Crediton, Newton St Cyres, Bow and North Tawton.

Land East of Duling's Farm, Copplestone

Land east of Dulings Farm, as shown outline red on the attached plan, is located immediately adjacent to existing residential development and would represent a logical extension to, and continuation of the more recent pattern of growth to the east of the village.

An outline application for the residential development of the site (ref. 17/00136/MOUT) has recently been submitted to the Council (resubmission of previous application ref. 16/00924/MOUT) and demonstrates that the site could accommodate:

- Up to 60 residential dwellings, at an approximate density of 28 dwellings per hectare. The exact mix of the housing provided will be determined at the reserved matters (detailed design) stage, however, it is expected that a full mix of housing types and sizes would be provided.
- 35% on-site affordable housing;
- New public open space and landscaped areas;
- An off-site pedestrian and cycle link to Copplestone Primary School;
- Improved vehicular access and pedestrian safety improvements to the corner of Bewlsey Hill and the A377;
- Ecological enhancements including the provision of new hedgerow, wetland with wildflower planting and attenuation features.

The site is in a sustainable location and the development would be commensurate with the scale of the settlement and is capable of delivering significant benefits in addition to boosting housing supply.

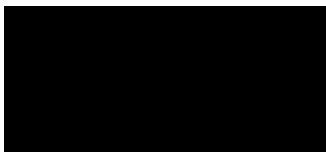
Conclusion

Whilst a town focus approach may not necessarily be the most popular option that is before the Council, it is important to note that the planning system is not a popularity contest and that there are numerous sound planning reasons why this proposal represents the 'right' strategic direction for Mid Devon.

The existing towns and villages in the District are clearly capable of meeting the Council's housing requirements and extensions to existing settlements that currently exist in Mid Devon are more sustainable than a new settlement.

Thank you for the opportunity of commenting. We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind regards,



David Seaton, BA (Hons) MRTPI
For **PCL Planning Ltd**

e: 

☐ Application boundary

☐ Other land within applicant's ownership or control



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Land at Dulings Farm, Copplestone
Location Plan

SB/DCC
E

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CliftonEmerydesign

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[REDACTED]

From: Local Plan Review
Subject: FW: Mid Devon Local Plan Review Consultation - Representations
Attachments: 10-02 Local Plan Reps.pdf

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Sent: 10 February 2017 13:54
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Our Ref: PCL/NS/9885
Date: 10th February 2017



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Copplestone is a large village with a population of approximately 1,253 (2011 census) and lies approximately 4 miles from Crediton and 11 miles north west of the major urban centre of Exeter. The village benefits from a range of services and facilities which are largely situated in the village core including primary school, public house, church, post office, store and garage.

Copplestone also has a railway station that provides good services to both Exeter and Barnstaple. The village also benefits from regular bus services running Monday to Saturday to and from Exeter, Crediton, Newton St Cyres, Bow and North Tawton.

Land East of Duling's Farm, Copplestone

Land east of Dulings Farm, as shown outline red on the attached plan, is located immediately adjacent to existing residential development and would represent a logical extension to, and continuation of the more recent pattern of growth to the east of the village.

An outline application for the residential development of the site (ref. 17/00136/MOUT) has recently been submitted to the Council (resubmission of previous application ref. 16/00924/MOUT) and demonstrates that the site could accommodate:

- Up to 60 residential dwellings, at an approximate density of 28 dwellings per hectare. The exact mix of the housing provided will be determined at the reserved matters (detailed design) stage, however, it is expected that a full mix of housing types and sizes would be provided.
- 35% on-site affordable housing;
- New public open space and landscaped areas;
- An off-site pedestrian and cycle link to Copplestone Primary School;
- Improved vehicular access and pedestrian safety improvements to the corner of Bewlsey Hill and the A377;
- Ecological enhancements including the provision of new hedgerow, wetland with wildflower planting and attenuation features.

The site is in a sustainable location and the development would be commensurate with the scale of the settlement and is capable of delivering significant benefits in addition to boosting housing supply.

Conclusion

Whilst a town focus approach may not necessarily be the most popular option that is before the Council, it is important to note that the planning system is not a popularity contest and that there are numerous sound planning reasons why this proposal represents the 'right' strategic direction for Mid Devon.

The existing towns and villages in the District are clearly capable of meeting the Council's housing requirements and extensions to existing settlements that currently exist in Mid Devon are more sustainable than a new settlement.

Thank you for the opportunity of commenting. We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind regards,

David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd

e: [REDACTED]

4675/S2/MOD
4675/CU7-CU12

4675/TIV1-TIV5
4675/DEWTRA/MOD

4675/OTIV2

4675/S27/MOD

From: Local Plan Review
Subject: FW: MDDC Local Plan Review Proposed Submission Consultation
Attachments: 02-10-17_MDDC LPR Reps_Waddeton 1_2.pdf
Importance: High

4675/TIV16/1
4675/S3/MOD
4675/CU21

From: Alex Graves [REDACTED]
Sent: 10 February 2017 17:30
To: Local Plan Review
Cc: DPD; DPD
Subject: MDDC Local Plan Review Proposed Submission Consultation
Importance: High

Dear Sir/Madam,

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Would you please acknowledge receipt of these comments.

A hard copy, with attachments, will also be sent by post.

Many thanks

Alex

*Alex Graves BA (Hons) PG Dip MRTPI
Director*

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Our Ref AG/SJS/9884
Date 10th February 2017



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Dear Sir/Madam,

LOCAL PLAN REVIEW PROPOSED SUBMISSION CONSULTATION

We write on behalf of our client, Waddeton Park Ltd, who have property interests in Mid Devon District. We set out representations on our client's behalf in response to the *Local Plan Review Proposed Submission Consultation* (January 2017). This letter is one of two separate representations that will be submitted by us on behalf of Waddeton Park Ltd.

Amount and Distribution of Development – Policy S2

Our comments on the previous submission draft advocated growth of "at least" 7,800 dwellings up to 2033. We note that **Policy S2** increases the number of dwellings, when compared with the earlier draft, and now identifies a need for 7,860 dwellings up to 2033 (albeit para 2.4 states that the Plan will allocate 10% more housing than is required, to provide flexibility and account for unforeseen circumstances that might prevent some sites from coming forward as expected). We welcome this. Although it must be recognised that this figure is not a ceiling to growth, and as such the policy should read "at least" 7,860.

It appears to us that the key decision facing the Council is where to allocate significant new development. Mid Devon have assessed two possible options for delivering the quantum of development suggested:

- A town focus (i.e. Cullompton, Tiverton and Crediton)
- A new settlement

Mid Devon has decided to pursue the new settlement option. It is no surprise that the idea of a new settlement is the option that has raised the least objection, as typically urban extensions are opposed by those who perceive that they may bring change to their locality.

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Mid Devon is largely rural in character and it falls within the sphere of influence of both Exeter and Taunton. This matter was analysed in detail as part of the SW RSS evidence base. Whilst the RSS was revoked, the evidence underlying it still stands. Including the DTZ 'South West Regional Housing Board Analysis of Sub Regional Housing Markets in the South West' (2004) which identified 12 sub-regional housing markets, including Exeter, finding:

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Therefore, it is inevitable that Mid Devon will have to meet some of Exeter and Taunton's housing need. Especially Exeter's, given the constraints the City suffers from which severely restrict its ability to meet its own housing need. This explains the allocation of Cranbrook in East Devon and no doubt lies behind Mid Devon's proposed East Culm allocation (an approach we question).

We believe that development should be focused at the main towns within the district as this is the most sustainable and deliverable option.

The existing adopted Local Plan states that development in and adjacent to the main towns is the most sustainable way of providing for both housing and economic growth, as the main towns offer the greatest level of services and facilities, opportunities for both existing employment provision and attracting new businesses. This urban concentration strategy ensures that distances between houses, services and jobs are shorter, which reduces reliance on the car and allows those without a car, access to services and employment.

It is worthwhile reminding ourselves what the current Development Plan enshrines:

Mid Devon Core Strategy 2026 (adopted July 2007)

The overall spatial strategy seeks to increase the self-sufficiency of the district as a whole and the settlements within it and to guide development to the most

sustainable locations. Specifically, it identifies that the market towns of Tiverton, Cullompton, Crediton and Bampton should be the main focus of new development.

The strategy evolved from the previous strategy and policies set out in the Mid Devon Local Plan First Alteration, which also sought to concentrate new development within the towns.

Of the four alternative options considered, the 'balanced growth' strategy, was found to be the most sustainable and would *"provide for both housing and economic development in locations which minimise traffic generation..."* (paragraph 5.10).

Paragraph 7.8 of the document is clear in its assertion that

"the Core Strategy has a clear spatial strategy, set out in COR12 and reflected in policies COR13 – COR17. Tiverton, Cullompton and Crediton are the foci of development. Providing for over 80% of the housing allocations, with Bampton playing a much more limited role and the remaining rural areas providing for local needs only. This strategy is robust and would continue to be appropriate with higher rates of development."

Very clear decisions were made at the time of preparing the current Local Plan, based on clear and compelling evidence, that a Tiverton focused approach to accommodating the 'lion's share' of new development was plainly the most suitable. This approach was endorsed by the Inspector in the Examination of the Core Strategy (Inspector's Report dated 1st May 2007). Paragraph 3.4.12 states:

"Tiverton is by far the largest town in the district, with the most developed employment base, retail and education provision and the best public transport services. It is therefore, reasonable in my view to seek to allocate about half the proposed development to the town"

It is clear from an analysis of updated census data that a similar pattern remains. The Mid Devon Area Profile (produced for Devon County Council, February 2014) of particular relevance identifies that:

- Mid Devon is a predominantly rural district
- There is the potential for consideration development activity at Tiverton.
- Cullompton's economic influence is more localised, with a high number of vacant units in the town centre.
- 41.3% of the district's residents use car to travel to work – the highest proportion amongst Devon's districts.
- There is a commuting outflow of 16,238 from the district, largely to

Exeter, and an inflow of 7,759, again predominantly from Exeter – the result is a net flow of workers out of the district of 8,479.

A town focus approach strongly accords with the core planning principles set out in the National Planning Policy Framework (referred to as 'the Framework' from here on). Specifically, the importance of focusing housing development in locations accessible to the main centres with economic growth potential both reduces overall travel needs and maximises the scope for the fullest use of public transport, walking and cycling. The larger settlements in the district offer the greatest potential to achieve this, due to their greater size and the economies of scale that this offers in terms of offering employment and services in the same settlements.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. It therefore follows that the strategic option with the best sustainability credentials must surely be the preferred option.

It is for these reasons that our clients strongly support a town focus approach.

Whilst a New Community may seem attractive to some, largely as it would divert development away from other towns, it is not a realistic option. In order to be self-sustaining, a new community would need to comprise at least 4,000 houses, a far greater number than that currently proposed, and a figure far higher than could be sensibly allocated in one location over the plan period.

The economic growth potential provided for in the current plan at Tiverton, Cullompton and Crediton would undoubtedly be prejudiced by the need to promote a new community, another negative impact of the new settlement. In sequential terms, a new community is the least sustainable option.

Specific reasons why a new settlement is inappropriate in Mid Devon in the period to 2033

Experience and evidence demonstrates that:

- i. New settlements are only viable if they have a sufficient critical mass. There is experience of this in the south east and it is locally evident that both new settlements that were proposed in the Devon Structure Plan First Review 1995-2011 (adopted February 1999) proved to be non-viable without significant public funding. Both Sherford and Cranbrook were allocated at a far greater number of dwellings than are proposed at the 'Cullompton New Settlement.'
- ii. A new community would require very significant upfront investment in new infrastructure, facilities and core services. It is now evident that both

the Government and the Council accept that the new settlement is not viable without public sector funding. Such infrastructure investment requires Government support. We draw your attention to the Technical Note attached as Appendix 1, which addresses viability in detail. However, we will take this opportunity to briefly comment on the matter.

The cost of providing some community infrastructure items (such as sports pitches and play areas, green infrastructure, community uses, schools etc.) will likely be the same regardless of where development is concentrated – Tiverton or Cullompton. However, the crucial difference largely boils down to the transport infrastructure requirements. In transport terms the key infrastructure item, should development be concentrated in Tiverton, is the already permitted and funded A361 junction from the TIV/1 allocated urban extension which has sufficient capacity, we say, to meet the transport needs of the Hartnoll Park site and the allocated EUE. The total number of dwellings would equate to 2,580.

The key transport infrastructure requirement necessary to accommodate the increased traffic generated by the new community at Cullompton is an improvement to J28 of the M5. The only option which appears to work in terms of capacity is a new junction 28A with south facing slip roads (north facing slip roads cannot be constructed as they would be too close to junction 28 to comply with standards). The cost estimate for this scheme currently stands at £120 million. This will prove difficult to fund and is far greater than the cost of the Tiverton link road.

Along with cost, there is another benefit to Hartnoll Park and the allocated EUE, as all the owners needed for the fully funded A361 junction are on board whilst J28 relies on an estimated twenty parties.

From a viability and deliverability viewpoint, there can be no doubt that the concentration of development at Tiverton (where the major infrastructure will already be in place from the approved EUE) is by far the best option. The costs of concentration at Cullompton are prohibitive and depend largely on Government funding and agreement from the Highways Agency and Network Rail (Junction 28 would need careful management to avoid overcapacity even with a new Junction 28A).

Our evidence demonstrates that the urban extension of Tiverton is intrinsically viable and does not need Government funding to make a non-viable development viable.

- iii. Cranbrook and Sherford sites did not take place during the original plan period – commencement only took place after a further review of the plan (and the confirmation of the Government funding). The sites had

significant lead in times, taking in excess of 15 years from first being considered to planning permission being granted, let alone construction. With a plan period looking ahead to 2033, the main focus for development must therefore continue to be in the three main towns of Cullompton, Tiverton and Crediton if a deliverable supply of new homes is to be maintained during the plan period.

- iv. Neither of the Councils (East Devon District Council and South Hams District Council) that have opted for a new settlement is in control of its housing supply position. South Hams is unable to demonstrate a 5 year supply of deliverable residential land and East Devon's supply is also at risk, in part, because of this lack of control. As a result, both Councils are at risk of appeal and the associated risk of costs being awarded against them.
- v. Sherford and Cranbrook are both related to the strategic economic scale and growth potential of Plymouth and Exeter respectively, building on the economic base of these two sub regional centres. This is deliberate and ensures that the need to travel is minimised and public transport is an attractive choice between the new settlement and its companion city. The situation is very different in a rural area like Mid Devon. Cullompton is a small market town and is not appropriately located (nor serviced) to provide a sustainable option for growth of this order (as recognized in the existing Core Strategy, paras 7.51 and 7.53, page 44).
- vi. Finally, it should be remembered that new settlements are inherently less sustainable than urban extensions. They normally require new infrastructure provision that is not necessary with urban extensions that simply require upgrading and improvements to existing infrastructure. Such improvements normally benefit existing residents (as with the forthcoming sewerage improvements to Tiverton that SWW will be compelled to undertake as planned development proceeds as Tiverton). This is why, in previous Government guidance (PPG3), the sequential test process placed new settlements as 'the last stop on the line'.

The new settlement option proposed within Mid Devon is plagued by numerous specific delivery problems. These matters are significant (plainly a new rail station and a new motorway junction are pre-requisites to any new settlement) and will ensure that the Council will not be able to maintain a 5 year supply of **deliverable** residential land at the Examination into the submitted plan, as required by the Framework even if the potentially available (but unnecessary) Government funding is applied.

What pattern of growth is both sustainable and deliverable?

The concept of the new settlement is predicated on the claim that the existing

towns cannot accommodate the level of growth required to allow for a continuing urban concentration. This is patently not true.

The notion that the required housing growth levels can only be met through the provision of a new settlement is fundamentally flawed. **Policy S2** sets out the proposed distribution of the dwellings required up to 2033. The distribution is as follows:

Location	Proportion of residential growth
Tiverton	30%
Cullompton	50%
Crediton	10%
Rural Areas	10%
Total	100%

The above distribution is largely predicated on the flawed assumption that Tiverton cannot accommodate a greater proportion of growth up to 2033, and that as a result Cullompton must become the key location for new development over the next 20 years (accommodating about half of the housing and commercial provision), with Tiverton taking a reduced proportion (about 30%). The distribution below can be satisfactorily accommodated (based on 7,860 dwellings). As such, the entire premise behind the new settlement is flawed, unjustified and unnecessary.

Location	Number of dwellings	Proportion of residential growth
Tiverton	3,537 dwellings	45%
Cullompton	2,751	35%
Crediton	786	10%
Rural Areas	786	10%
Total	7,860	100%

It is plain that urban extensions to the main settlements that currently exist in Mid Devon are more sustainable than the proposed new settlement.

Tiverton

Policy S2 identifies the need for 2,358 dwellings in Tiverton up to 2033 (and **S10** allows for 2,546 dwellings once the para 2.4 10% over allocation is factored in). This deflated proportion is largely based on the claim that Tiverton cannot accommodate a greater proportion of growth due to a range of constraints. This is clearly nonsense. We contend that 3,537 dwellings should be accommodated in Tiverton (45% of the proposed plan growth).

The previous stage of the Local Plan Review identified a number of potential housing sites in Tiverton, these totalling well in excess of 3,000 dwellings. In

our view, this demonstrates that the required number of dwellings could (and should) be met without the need for the proposed East Cullompton new settlement (**Policy CU7**).

We strongly support the retention of the Eastern Urban Extension (**Policy TIV1**), as it represents a sustainable and effective means of delivering the long-term housing needs of the town. Our clients are part of the consortium that worked in partnership with Mid Devon District Council, Devon County Council, statutory bodies and key local stakeholders in order to deliver an adopted masterplan for the site. Outline proposals have since been submitted and approved with other outline proposals expected to receive planning permission in the near future. Given this there can be no question regarding the commitment to deliver the urban extension in a timely fashion.

Additionally, we continue to propose that a key component in the delivery of a town focus strategy should be a further urban extension to the east of Tiverton at Hartnoll Farm/Hartnoll Park, which can also be delivered at the required time.

Hartnoll Park

The Hartnoll Park site is located immediately adjacent to the allocated Eastern Urban Extension.

Hartnoll Park is the deliverable and sustainable extension to Tiverton that is appropriate to the scale of the settlement. The site has the added virtue (being in a single ownership) that it can be brought forward early to 'cover' the likely lack of delivery that may occur from the 'area B' part of the existing urban extension, allowing further time for this element of supply to come forward without resorting to the need for development at an alternative location to be consented in order to maintain a 5 year supply of deliverable housing land.

A residential led scheme has been prepared for the site based on a detailed understanding of its characteristics and features which is informed by the findings of comprehensive range of technical and specialist work (on such matters as ecology, trees, landscape, utilities and flooding), appended to these representations.

The work done shows the proposed development to be viable, that it can and will make its proper contribution to mitigating its impact and that it can be delivered early in the plan period.

Specifically, the proposal shows that that a sustainable community at Hartnoll Park can be created which could accommodate the following:

Residential dwellings – At least 1,000 residential dwellings are proposed to be at an average density of 35 dwellings per hectare. The exact mix of the housing provided will be determined at the reserved matters (detailed design) stage, however, it is expected that a full mix of housing types and sizes would be provided. The application proposals will provide an element of affordable housing provision and the exact level of provision will be agreed with the local planning authority and set out in a Section 106 Agreement.

Employment - An area of land extending to 6.97 hectares that is adjacent to and wraps around the existing Hartnoll Business Centre and is proposed to enable the delivery of circa 24,000 sq. m of employment floorspace. This will be delivered in line or in advance of the housing development.

Local centre - The scheme proposes the creation of a local centre to serve the retail and social needs of the new community. Within the local centre 2,000 sq.m of floorspace is proposed to facilitate the provision of a mix of uses, which could include a community hall/space, local shops, restaurant/café, public house and/or hot-food takeaway uses. The provision of residential units is also proposed within the local centre.

Primary school - A parcel of land of 1.95 hectares is included within the proposal to accommodate a two form entry primary school.

Public open space/green infrastructure - The proposal includes substantial areas of public open space, green infrastructure and landscaping. Specifically, amenity open space, children's play, allotments/orchards and buffer planting can be provided within these areas as required. In relation to strategic public open space (such as sports/playing pitch provision and parks specifically) the applicant proposes to provide these (off-site) on adjacent land (in their control/ownership) to the immediate south of the application site (as indicated by the blue line on the site location plan). The land will be fully integrated with the developments in the wider area and is expected to accommodate a minimum of two playing pitches and a canal side park.

It is therefore clear that a sustainable extension of Tiverton at this site would not result in any significant and unacceptable impacts that would conflict with local or national planning policy. The proposed development is sustainable development that will complement the adjacent Eastern Urban Extension. If the Hartnoll Park site is included in the plan then together with the Eastern Urban Extension these proposals will ensure that the Council can 'boost significantly' the supply of homes and jobs to meet the needs of the district.

Whilst it is considered inappropriate to submit their application at the moment, our clients are keeping the timing of submission under review.

Affordable Housing – Hartnoll Park is not fettered by the same degree of infrastructure burden suffered by the new community, in part because it already has its road junction, and as such Hartnoll Park is able to deliver affordable housing at the rate set out in the Local Plan Review January 2017.

We question the ability of the new settlement to do this given its infrastructure requirements.

Junction 27

The emerging plan allocates land at M5 junction 27 for a retail and leisure development. The Council say that 200 dwellings at Tiverton are needed as a result of this. The Council's proposal is to provide these dwellings on the Blundells School site (**TIV/16**) that was to be deleted as an allocation in an earlier iteration of the Local Plan Review. **TIV/16** is in a complex ownership with no overall control of the land and, of itself, needs a new road linking Blundells Road to Heathcoat Way. This raises serious doubt as to the viability and deliverability of this allocation. Allocating land at Hartnoll Park for these 200 dwellings would guarantee delivery for all the reasons stated above.

Cullompton

The distribution we recommend requires circa 2,751 dwellings in Cullompton up to 2033. Excluding the new settlement at East Cullompton the *Local Plan Review Proposed Submission Consultation* allocates 1,808 dwellings for Cullompton. This leaves a residual of circa 943 houses to be allocated for Cullompton should the above distribution be followed.

We are aware that the Cullompton North West Urban Extension consortium is promoting an extension to the urban extension to deliver circa 1,500 dwellings. A contingency site is also suggested at Colebrooke (**Policy CU21**). Whilst the contingency site refers to 100 units, the previous stage of the Local Plan Review identified the capacity to accommodate 300 dwellings or more at Colebrooke. An allocation of this scale, along with the suggested extension to the North West Urban Extension, would deliver a large share of the houses needed to meet the distribution we recommend. The previous stage of the Local Plan Review also identified a range of other suitable sites in Cullompton, the allocation of which would deliver the residual requirement.

Crediton and the Rural Areas

We note that **Policy S2** of the latest draft increases the number of dwellings proposed, when compared with the earlier draft, now proposing 786 dwellings for each. We welcome this. Although it must be recognised that this figure is

not a ceiling to growth, and as such the policy should read "at least" 786 dwellings.

Gypsy and Traveller Pitches

A number of allocated residential and mixed use sites include a requirement for on-site gypsy and traveller pitches. As MDDC are aware, there are site funding issues associated with the risk and uncertainty regarding the location of pitches, with lenders not always prepared to carry the risk. Given this we suggest that flexibility is factored into the policy wording of allocations as far as this matter is concerned. A contribution toward off-site provision, in lieu of on-site pitches, may be appropriate in some circumstances. The policy wording should allow for this where appropriate.

Conclusion

Whilst a town focus approach may not necessarily be the most popular option that is before the Council, it is important to note that the planning system is not a popularity contest and that there are numerous sound planning reasons why this proposal represents the 'right' strategic direction for both Mid Devon and Tiverton. The 'Garden Village' status should not ride roughshod over the correct planning approach.

We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind regards



David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd
e: 

Chad Kirby

From: Local Plan Review
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Attachments: 02-10-17_MDDC LPR Reps_Waddeton 1_2.pdf
Importance: High

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Our Ref **AG/SJS/9884**
Date **10th February 2017**



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Therefore, it is inevitable that Mid Devon will have to meet some of Exeter and Taunton's housing need. Especially Exeter's, given the constraints the City suffers from which severely restrict its ability to meet its own housing need. This explains the allocation of Cranbrook in East Devon and no doubt lies behind Mid Devon's proposed East Culm allocation (an approach we question).

We believe that development should be focused at the main towns within the district as this is the most sustainable and deliverable option.

The existing adopted Local Plan states that development in and adjacent to the main towns is the most sustainable way of providing for both housing and economic growth, as the main towns offer the greatest level of services and facilities, opportunities for both existing employment provision and attracting new businesses. This urban concentration strategy ensures that distances between houses, services and jobs are shorter, which reduces reliance on the car and allows those without a car, access to services and employment.

It is worthwhile reminding ourselves what the current Development Plan enshrines:

Mid Devon Core Strategy 2026 (adopted July 2007)

The overall spatial strategy seeks to increase the self-sufficiency of the district as a whole and the settlements within it and to guide development to the most

sustainable locations. Specifically, it identifies that the market towns of Tiverton, Cullompton, Crediton and Bampton should be the main focus of new development.

The strategy evolved from the previous strategy and policies set out in the Mid Devon Local Plan First Alteration, which also sought to concentrate new development within the towns.

Of the four alternative options considered, the 'balanced growth' strategy, was found to be the most sustainable and would *"provide for both housing and economic development in locations which minimise traffic generation..."* (paragraph 5.10).

Paragraph 7.8 of the document is clear in its assertion that

"the Core Strategy has a clear spatial strategy, set out in COR12 and reflected in policies COR13 – COR17. Tiverton, Cullompton and Crediton are the foci of development. Providing for over 80% of the housing allocations, with Bampton playing a much more limited role and the remaining rural areas providing for local needs only. This strategy is robust and would continue to be appropriate with higher rates of development."

Very clear decisions were made at the time of preparing the current Local Plan, based on clear and compelling evidence, that a Tiverton focused approach to accommodating the 'lion's share' of new development was plainly the most suitable. This approach was endorsed by the Inspector in the Examination of the Core Strategy (Inspector's Report dated 1st May 2007). Paragraph 3.4.12 states:

"Tiverton is by far the largest town in the district, with the most developed employment base, retail and education provision and the best public transport services. It is therefore, reasonable in my view to seek to allocate about half the proposed development to the town"

It is clear from an analysis of updated census data that a similar pattern remains. The Mid Devon Area Profile (produced for Devon County Council, February 2014) of particular relevance identifies that:

- Mid Devon is a predominantly rural district
- There is the potential for consideration development activity at Tiverton.
- Cullompton's economic influence is more localised, with a high number of vacant units in the town centre.
- 41.3% of the district's residents use car to travel to work – the highest proportion amongst Devon's districts.
- There is a commuting outflow of 16,238 from the district, largely to

Exeter, and an inflow of 7,759, again predominantly from Exeter – the result is a net flow of workers out of the district of 8,479.

A town focus approach strongly accords with the core planning principles set out in the National Planning Policy Framework (referred to as 'the Framework' from here on). Specifically, the importance of focusing housing development in locations accessible to the main centres with economic growth potential both reduces overall travel needs and maximises the scope for the fullest use of public transport, walking and cycling. The larger settlements in the district offer the greatest potential to achieve this, due to their greater size and the economies of scale that this offers in terms of offering employment and services in the same settlements.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. It therefore follows that the strategic option with the best sustainability credentials must surely be the preferred option.

It is for these reasons that our clients strongly support a town focus approach.

Whilst a New Community may seem attractive to some, largely as it would divert development away from other towns, it is not a realistic option. In order to be self-sustaining, a new community would need to comprise at least 4,000 houses, a far greater number than that currently proposed, and a figure far higher than could be sensibly allocated in one location over the plan period.

The economic growth potential provided for in the current plan at Tiverton, Cullompton and Cridton would undoubtedly be prejudiced by the need to promote a new community, another negative impact of the new settlement. In sequential terms, a new community is the least sustainable option.

Specific reasons why a new settlement is inappropriate in Mid Devon in the period to 2033

Experience and evidence demonstrates that:

- i. New settlements are only viable if they have a sufficient critical mass. There is experience of this in the south east and it is locally evident that both new settlements that were proposed in the Devon Structure Plan First Review 1995-2011 (adopted February 1999) proved to be non-viable without significant public funding. Both Sherford and Cranbrook were allocated at a far greater number of dwellings than are proposed at the 'Cullompton New Settlement.'
- ii. A new community would require very significant upfront investment in new infrastructure, facilities and core services. It is now evident that both

the Government and the Council accept that the new settlement is not viable without public sector funding. Such infrastructure investment requires Government support. We draw your attention to the Technical Note attached as Appendix 1, which addresses viability in detail. However, we will take this opportunity to briefly comment on the matter.

The cost of providing some community infrastructure items (such as sports pitches and play areas, green infrastructure, community uses, schools etc.) will likely be the same regardless of where development is concentrated – Tiverton or Cullompton. However, the crucial difference largely boils down to the transport infrastructure requirements. In transport terms the key infrastructure item, should development be concentrated in Tiverton, is the already permitted and funded A361 junction from the TIV/1 allocated urban extension which has sufficient capacity, we say, to meet the transport needs of the Hartnoll Park site and the allocated EUE. The total number of dwellings would equate to 2,580.

The key transport infrastructure requirement necessary to accommodate the increased traffic generated by the new community at Cullompton is an improvement to J28 of the M5. The only option which appears to work in terms of capacity is a new junction 28A with south facing slip roads (north facing slip roads cannot be constructed as they would be too close to junction 28 to comply with standards). The cost estimate for this scheme currently stands at £120 million. This will prove difficult to fund and is far greater than the cost of the Tiverton link road.

Along with cost, there is another benefit to Hartnoll Park and the allocated EUE, as all the owners needed for the fully funded A361 junction are on board whilst J28 relies on an estimated twenty parties.

From a viability and deliverability viewpoint, there can be no doubt that the concentration of development at Tiverton (where the major infrastructure will already be in place from the approved EUE) is by far the best option. The costs of concentration at Cullompton are prohibitive and depend largely on Government funding and agreement from the Highways Agency and Network Rail (Junction 28 would need careful management to avoid overcapacity even with a new Junction 28A).

Our evidence demonstrates that the urban extension of Tiverton is intrinsically viable and does not need Government funding to make a non-viable development viable.

- iii. Cranbrook and Sherford sites did not take place during the original plan period – commencement only took place after a further review of the plan (and the confirmation of the Government funding). The sites had

significant lead in times, taking in excess of 15 years from first being considered to planning permission being granted, let alone construction. With a plan period looking ahead to 2033, the main focus for development must therefore continue to be in the three main towns of Cullompton, Tiverton and Cridton if a deliverable supply of new homes is to be maintained during the plan period.

- iv. Neither of the Councils (East Devon District Council and South Hams District Council) that have opted for a new settlement is in control of its housing supply position. South Hams is unable to demonstrate a 5 year supply of deliverable residential land and East Devon's supply is also at risk, in part, because of this lack of control. As a result, both Councils are at risk of appeal and the associated risk of costs being awarded against them.
- v. Sherford and Cranbrook are both related to the strategic economic scale and growth potential of Plymouth and Exeter respectively, building on the economic base of these two sub regional centres. This is deliberate and ensures that the need to travel is minimised and public transport is an attractive choice between the new settlement and its companion city. The situation is very different in a rural area like Mid Devon. Cullompton is a small market town and is not appropriately located (nor serviced) to provide a sustainable option for growth of this order (as recognized in the existing Core Strategy, paras 7.51 and 7.53, page 44).
- vi. Finally, it should be remembered that new settlements are inherently less sustainable than urban extensions. They normally require new infrastructure provision that is not necessary with urban extensions that simply require upgrading and improvements to existing infrastructure. Such improvements normally benefit existing residents (as with the forthcoming sewerage improvements to Tiverton that SWW will be compelled to undertake as planned development proceeds at Tiverton). This is why, in previous Government guidance (PPG3), the sequential test process placed new settlements as 'the last stop on the line'.

The new settlement option proposed within Mid Devon is plagued by numerous specific delivery problems. These matters are significant (plainly a new rail station and a new motorway junction are pre-requisites to any new settlement) and will ensure that the Council will not be able to maintain a 5 year supply of **deliverable** residential land at the Examination into the submitted plan, as required by the Framework even if the potentially available (but unnecessary) Government funding is applied.

What pattern of growth is both sustainable and deliverable?

The concept of the new settlement is predicated on the claim that the existing

towns cannot accommodate the level of growth required to allow for a continuing urban concentration. This is patently not true.

The notion that the required housing growth levels can only be met through the provision of a new settlement is fundamentally flawed. **Policy S2** sets out the proposed distribution of the dwellings required up to 2033. The distribution is as follows:

Location	Proportion of residential growth
Tiverton	30%
Cullompton	50%
Crediton	10%
Rural Areas	10%
Total	100%

The above distribution is largely predicated on the flawed assumption that Tiverton cannot accommodate a greater proportion of growth up to 2033, and that as a result Cullompton must become the key location for new development over the next 20 years (accommodating about half of the housing and commercial provision), with Tiverton taking a reduced proportion (about 30%). The distribution below can be satisfactorily accommodated (based on 7,860 dwellings). As such, the entire premise behind the new settlement is flawed, unjustified and unnecessary.

Location	Number of dwellings	Proportion of residential growth
Tiverton	3,537 dwellings	45%
Cullompton	2,751	35%
Crediton	786	10%
Rural Areas	786	10%
Total	7,860	100%

It is plain that urban extensions to the main settlements that currently exist in Mid Devon are more sustainable than the proposed new settlement.

Tiverton

Policy S2 identifies the need for 2,358 dwellings in Tiverton up to 2033 (and **S10** allows for 2,546 dwellings once the para 2.4 10% over allocation is factored in). This deflated proportion is largely based on the claim that Tiverton cannot accommodate a greater proportion of growth due to a range of constraints. This is clearly nonsense. We contend that 3,537 dwellings should be accommodated in Tiverton (45% of the proposed plan growth).

The previous stage of the Local Plan Review identified a number of potential housing sites in Tiverton, these totalling well in excess of 3,000 dwellings. In

our view, this demonstrates that the required number of dwellings could (and should) be met without the need for the proposed East Cullompton new settlement (**Policy CU7**).

We strongly support the retention of the Eastern Urban Extension (**Policy TIV1**), as it represents a sustainable and effective means of delivering the long-term housing needs of the town. Our clients are part of the consortium that worked in partnership with Mid Devon District Council, Devon County Council, statutory bodies and key local stakeholders in order to deliver an adopted masterplan for the site. Outline proposals have since been submitted and approved with other outline proposals expected to receive planning permission in the near future. Given this there can be no question regarding the commitment to deliver the urban extension in a timely fashion.

Additionally, we continue to propose that a key component in the delivery of a town focus strategy should be a further urban extension to the east of Tiverton at Hartnoll Farm/Hartnoll Park, which can also be delivered at the required time.

Hartnoll Park

The Hartnoll Park site is located immediately adjacent to the allocated Eastern Urban Extension.

Hartnoll Park is the deliverable and sustainable extension to Tiverton that is appropriate to the scale of the settlement. The site has the added virtue (being in a single ownership) that it can be brought forward early to 'cover' the likely lack of delivery that may occur from the 'area B' part of the existing urban extension, allowing further time for this element of supply to come forward without resorting to the need for development at an alternative location to be consented in order to maintain a 5 year supply of deliverable housing land.

A residential led scheme has been prepared for the site based on a detailed understanding of its characteristics and features which is informed by the findings of comprehensive range of technical and specialist work (on such matters as ecology, trees, landscape, utilities and flooding), appended to these representations.

The work done shows the proposed development to be viable, that it can and will make its proper contribution to mitigating its impact and that it can be delivered early in the plan period.

Specifically, the proposal shows that that a sustainable community at Hartnoll Park can be created which could accommodate the following:

Residential dwellings – At least 1,000 residential dwellings are proposed to be at an average density of 35 dwellings per hectare. The exact mix of the housing provided will be determined at the reserved matters (detailed design) stage, however, it is expected that a full mix of housing types and sizes would be provided. The application proposals will provide an element of affordable housing provision and the exact level of provision will be agreed with the local planning authority and set out in a Section 106 Agreement.

Employment - An area of land extending to 6.97 hectares that is adjacent to and wraps around the existing Hartnoll Business Centre and is proposed to enable the delivery of circa 24,000 sq. m of employment floorspace. This will be delivered in line or in advance of the housing development.

Local centre - The scheme proposes the creation of a local centre to serve the retail and social needs of the new community. Within the local centre 2,000 sq.m of floorspace is proposed to facilitate the provision of a mix of uses, which could include a community hall/space, local shops, restaurant/café, public house and/or hot-food takeaway uses. The provision of residential units is also proposed within the local centre.

Primary school - A parcel of land of 1.95 hectares is included within the proposal to accommodate a two form entry primary school.

Public open space/green infrastructure - The proposal includes substantial areas of public open space, green infrastructure and landscaping. Specifically, amenity open space, children's play, allotments/orchards and buffer planting can be provided within these areas as required. In relation to strategic public open space (such as sports/playing pitch provision and parks specifically) the applicant proposes to provide these (off-site) on adjacent land (in their control/ownership) to the immediate south of the application site (as indicated by the blue line on the site location plan). The land will be fully integrated with the developments in the wider area and is expected to accommodate a minimum of two playing pitches and a canal side park.

It is therefore clear that a sustainable extension of Tiverton at this site would not result in any significant and unacceptable impacts that would conflict with local or national planning policy. The proposed development is sustainable development that will complement the adjacent Eastern Urban Extension. If the Hartnoll Park site is included in the plan then together with the Eastern Urban Extension these proposals will ensure that the Council can 'boost significantly' the supply of homes and jobs to meet the needs of the district.

Whilst it is considered inappropriate to submit their application at the moment, our clients are keeping the timing of submission under review.

Affordable Housing – Hartnoll Park is not fettered by the same degree of infrastructure burden suffered by the new community, in part because it already has its road junction, and as such Hartnoll Park is able to deliver affordable housing at the rate set out in the Local Plan Review January 2017.

We question the ability of the new settlement to do this given its infrastructure requirements.

Junction 27

The emerging plan allocates land at M5 junction 27 for a retail and leisure development. The Council say that 200 dwellings at Tiverton are needed as a result of this. The Council's proposal is to provide these dwellings on the Blundells School site (**TIV/16**) that was to be deleted as an allocation in an earlier iteration of the Local Plan Review. **TIV/16** is in a complex ownership with no overall control of the land and, of itself, needs a new road linking Blundells Road to Heathcoat Way. This raises serious doubt as to the viability and deliverability of this allocation. Allocating land at Hartnoll Park for these 200 dwellings would guarantee delivery for all the reasons stated above.

Cullompton

The distribution we recommend requires circa 2,751 dwellings in Cullompton up to 2033. Excluding the new settlement at East Cullompton the *Local Plan Review Proposed Submission Consultation* allocates 1,808 dwellings for Cullompton. This leaves a residual of circa 943 houses to be allocated for Cullompton should the above distribution be followed.

We are aware that the Cullompton North West Urban Extension consortium is promoting an extension to the urban extension to deliver circa 1,500 dwellings. A contingency site is also suggested at Colebrooke (**Policy CU21**). Whilst the contingency site refers to 100 units, the previous stage of the Local Plan Review identified the capacity to accommodate 300 dwellings or more at Colebrooke. An allocation of this scale, along with the suggested extension to the North West Urban Extension, would deliver a large share of the houses needed to meet the distribution we recommend. The previous stage of the Local Plan Review also identified a range of other suitable sites in Cullompton, the allocation of which would deliver the residual requirement.

Crediton and the Rural Areas

We note that **Policy S2** of the latest draft increases the number of dwellings proposed, when compared with the earlier draft, now proposing 786 dwellings for each. We welcome this. Although it must be recognised that this figure is

not a ceiling to growth, and as such the policy should read "at least" 786 dwellings.

Gypsy and Traveller Pitches

A number of allocated residential and mixed use sites include a requirement for on-site gypsy and traveller pitches. As MDDC are aware, there are site funding issues associated with the risk and uncertainty regarding the location of pitches, with lenders not always prepared to carry the risk. Given this we suggest that flexibility is factored into the policy wording of allocations as far as this matter is concerned. A contribution toward off-site provision, in lieu of on-site pitches, may be appropriate in some circumstances. The policy wording should allow for this where appropriate.

Conclusion

Whilst a town focus approach may not necessarily be the most popular option that is before the Council, it is important to note that the planning system is not a popularity contest and that there are numerous sound planning reasons why this proposal represents the 'right' strategic direction for both Mid Devon and Tiverton. The 'Garden Village' status should not ride roughshod over the correct planning approach.

We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind regards



David Seaton, BA (Hons) MRTPI
For PCL Planning Ltd

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