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6739/CU7-CU12  
6739/DEVSTRA

6739/S10/mod  
6739/CU21  
6739/OCKRENEW1

**From:** Local Plan Review  
**Subject:** FW: Mid Devon Local Plan Review Consultation - Representations  
**Attachments:** 02-13 Local Plan Reprs\_ CREDITON.pdf

**From:** Nicole Stacey [REDACTED]  
**Sent:** 13 February 2017 15:44  
**To:** Local Plan Review  
**Cc:** Sarah Smith  
**Subject:** Mid Devon Local Plan Review Consultation - Representations

Dear Sir/ Madam,

Please find attached representations to the above consultation on behalf of our client Kach Developments.

I would be grateful if you could please confirm receipt of these representations.

Kind regards,

Nicole

**Nicole Stacey BSc (Hons) MSc MRTPI**  
**Associate Director**

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**Our Ref: PCL/9865**  
**Date: 13<sup>th</sup> February 2017**



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

By email to: █

Dear Sirs,

## **LOCAL PLAN REVIEW PROPOSED SUBMISSION CONSULTATION**

We write on behalf of our client, Kach Developments, who has 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).

### **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. 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.

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.

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:

<b>Location</b>	<b>Proportion of residential growth</b>
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%). 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.

<b>Location</b>	<b>Number of dwellings</b>	<b>Proportion of residential growth</b>
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 and Cullompton**

**Policies S2** and **S10** identify the need for 2,358 dwellings in Tiverton up to 2033. 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**).

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**

Our comments on the previous submission draft advocated growth of “at least” 780 dwellings up to 2033 for Crediton. 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 both Crediton and the Rural Area. 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.

We support the recognition in the plan of the role that Crediton plays in serving the surrounding rural hinterland in terms of employment, education and retail provision. The town is a sustainable location for residential development, which should continue to be supported.

We propose a site be considered and incorporated into the settlement limit of Crediton as an appropriate site allocation for residential development. The site lies towards the western edge of the town, to the south of Landscore and west of Wynfrith Mews and east of The Parks (edged red on the attached Location Plan).

The site would represent a logical infill plot, situated between existing residential properties to the south of Landscore. The site is considered capable of accommodating approximately 5-10 dwellings. The site is available and suitable for development and would be achievable in a timely manner.

The site is in close proximity to the town centre and a wider range of services and facilities. It is not subject to any landscape designations (such as AONB etc.) and adjoins the Conservation Area for the town. The site provides the opportunity to deliver a high quality development would respect its context and preserve/enhance the setting of the Conservation Area.

The development of this site would not result in any significant and unacceptable impacts that would be in conflict with local or national planning policy.

### **Conclusions**

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 the District.

There are suitable sites for development which are capable of being brought forward at the main towns, including Crediton, to meet the District's housing requirements.

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.

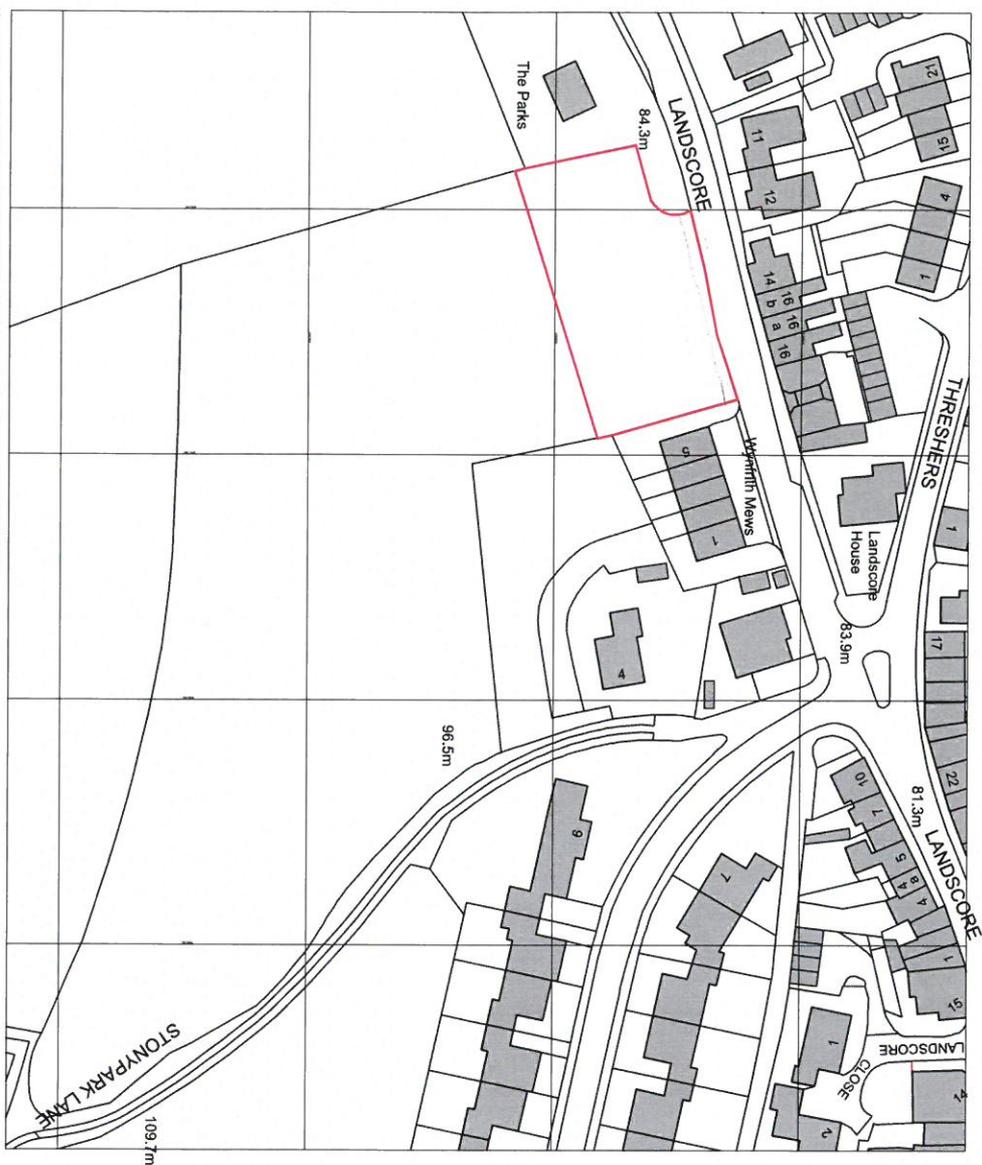
Kind regards,



Nicole Stacey BSc (Hons) MSc MRTPI  
**For PCL Planning Ltd**  
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Enc.

NOTES:  
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PROJECT  
 Proposed Development at Landscore  
 CREATION  
 Site Location Plan  
 DATE  
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 DRAWN BY  
 DG  
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XXX @ A3

Preliminary

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