

6750/OCRE10

6750/S4

6750/S2

6750/S12

**From:** Local Plan Review  
**Subject:** FW: MID DEVON LOCAL PLAN CONSULTATION  
**Attachments:** Red Line Plan.pdf; preappcovering.doc  
**Importance:** High

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**From:** Mark Scoot [mailto:mark.scoot@cambridgeshire.gov.uk]  
**Sent:** 14 February 2017 09:21  
**To:** Local Plan Review  
**Cc:** mark.scoot  
**Subject:** MID DEVON LOCAL PLAN CONSULTATION  
**Importance:** High

Dear Sir / Madam

**MID DEVON LOCAL PLAN REVIEW  
REPRESENTATIONS IN RESPECT OF LAND AT WESTERN LEA / PITT LANE (WESTWOOD FARM), CREDITON**

I am instructed to act on behalf of Mr B. Lee to submit representations in respect of the emerging local plan and to promote land at Westwood Farm as being suitable for residential development. The site immediately adjoins the settlement and is well served by a choice of modes of transport. The town centre, schools (primary and secondary), health services and other facilities are all within an easy walking distance of the site. A pre-application enquiry has been submitted and the following information is submitted in support of the representation:

1. Site Red Line Plan;
2. Covering Letter providing details on the site and its fit with the emerging plan.

The site formed part of a larger area that was considered through the SHLAA process and no constraints to development were identified. It was concluded that the site is deliverable.

The site was also considered through an earlier Local Plan consultation. The attached covering letter is based on up to date and detailed information that was not available at the time of the previous Local Plan consultation. This assessment concludes that based on the up to date information the site scores as well as any other residential allocation being promoted in Crediton.

On this basis it is our opinion that the site should be allocated for residential development in the emerging plan. The remainder of this correspondence provides representations on specific policies:

**Housing Requirement and Policies S2 and S12**

The overall housing requirement is proposed to be split as approximately 30% to Tiverton, 50% to Cullompton and 10% to Crediton. This approach raises a significant risk of under delivery in Cullompton which thereby jeopardies the overall development plan strategy. For example, completions to date confirm that to date Cullompton has only delivered 102 units more than Crediton despite the fact that it should be delivering five times as many units as Crediton.

The Plan states that traffic and topographical issues are the only constraint to development in Crediton. Neither of these issues affects the Westwood Farm site. It forms a logical extension to the settlement boundary and can be delivered without any severe transportation impacts.

Given that Crediton is a highly sustainable settlement with a full range of community facilities, the minimum housing requirement should at least match that of Tiverton. This would ensure a more balanced rate and distribution of growth throughout Mid Devon. Such an approach will also make it more likely that the trajectory proposed in the draft plan can be achieved as at present it anticipates a significant growth in housebuilding rates while focusing most activity into a single allocation. Such an approach is likely to prejudice plan delivery.

**Policy S4**

The Framework requires authorities to maintain a minimum 5 year supply of land for housing and this should be reflected in the policy. The selection of an arbitrary figure of completions falling more than two years behind is inappropriate and does not reflect the objectives of significantly boosting housing supply.

**Sustainability Appraisal**

The site was considered as an alternative option in the original Sustainability Appraisal. The attached pre-application covering letter fully considers the issues raised based on detailed site analysis. This demonstrates that the site could readily accommodate a new residential development that would score at least as well as any of the emerging residential allocations.

**Conclusion**

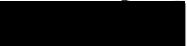
Given the significant need for additional housing, the lack of constraints to development and sustainability of the location we request that the site be allocated for residential development in the emerging plan.

I would be grateful for confirmation of receipt of this representation and would be happy to discuss any issues in more detail.

Regards

**Mark Scoot MRICS MRTPI**

**amethystplanning**



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24<sup>th</sup> January 2016

Development Management  
Mid Devon District Council  
Phoenix House  
Phoenix Lane  
Tiverton  
EX16 6PP

Dear Sir / Madam

## **LAND AT WESTWOOD FARM, CREDITON**

### **PRE-APPLICATION ENQUIRY FOR THE DEVELOPMENT OF UP TO 130 RESIDENTIAL UNITS, ASSOCIATED ACCESS, PARKING, INFRASTRUCTURE, OPEN SPACE AND LANDSCAPING**

### **PROPOSED OUTLINE APPLICATION WITH ALL MATTERS RESERVED APART FROM MEANS OF ACCESS**

I write further to my telephone enquiry in respect of the above and attach the following information to form part of the pre-application package:

- Red Line Plan;
- Draft Illustrative Layout;
- Completed pre-application enquiry form and fee;
- Draft Transport Assessment;
- Draft Flood Risk Assessment and Drainage Strategy.

#### **Proposed Development**

The draft masterplan proposes the development of up to 130 residential units, on site open space / children's play space, associated access, parking and infrastructure. An outline application is being prepared with all matters apart from the means of access reserved for subsequent consideration. The application will deliver the necessary CIL contribution and be policy compliant in terms of affordable housing provision.

#### **Five Year Land Supply**

Based on the Report of the Head of Planning and Regeneration on the Five-Year Housing Land Supply (Scrutiny Committee – 23.5.16) it is noted that a five-year land supply cannot be demonstrated and that therefore applications should be considered in the context of the requirements of Paragraphs 14 and 49 of the Framework.

Maypool House, Maypool. Devon. TQ5 0ET  
[REDACTED]

### Strategic Housing Land Availability Assessment (SHLAA) 2013

The subject site formed part of a larger area considered through the 2013 site appraisal process under reference Crediton Site 10 (Westwood Farm). The appraisal confirmed that the site is developable and that the northern part (subject area) is more contained and would offer less impact in landscape character terms than the southern area. The SHLAA also stated that the subject area has the possibility of being compatible with existing housing to the north. No constraints to development were identified by the SHLAA.

### Local Plan Review Sustainability Appraisal January 2015

The site was considered as a potential allocation for the development of 50 dwellings as set out in the Sustainability Appraisal. Each of the sites considered as part of the process are scored against a series of criteria and at page 51 an overall summary was provided. The score for the site and the other housing options is set out below:

Site	Score
Wellparks	5
Red Hill Cross	3
Cromwells Meadow	2
Exeter Road – Woods Group	5
Pedlerspool	4
Exhibition Road Sports Field	4
Stonewall Lane	2
Barn Park	3
Alexandra Close	0
Crediton Infrastructure	10
Westwood Farm	1

Based on the masterplan scheme and detailed site investigations, the 'score' for the site can be improved to a minimum of 5 which would make it better than the housing allocations as summarised below:

- Protection of the Natural Environment – the scheme can deliver appropriate landscaping and through hedgerow improvements will deliver an overall positive impact, thereby increasing the score from -1 to 1;
- Mitigating the effects of climate change – the supporting draft reports confirm the accessibility of the location by non-car modes and the fact that there is no flood risk. This would allow the score to increase from 0 to 1;
- Promoting economic growth the build out of the site will deliver economic benefits, thereby increasing the score from 0 to 1;
- Meeting housing needs – the scheme was previously appraised on the basis of 50 units and given a score of 2. The increase in size increases the score to 3;
- Community health and wellbeing – the supporting reports confirm that there are no detrimental impacts in respect of these issues and that the score can be increased from -1 to at least 0;
- Delivering infrastructure – the scheme will deliver a positive benefit, thereby increasing the score from 0 to 1.

This demonstrates that there are no constraints to bringing the site forward for development.

### **Agricultural Land, Landscape and Visual Impacts**

In terms of landscape impacts and the loss of agricultural land, it is inevitable that delivering the identified housing growth set out in the Development Plan will necessitate the release of greenfield sites with associated impacts in this respect. Therefore, by choosing to release relatively poor agricultural land that is not the subject to any landscape designations, the development of the subject site will assist in minimising the impacts of growth at a district wide level and reduce the demand for the release of more sensitive land in both landscape terms and in terms of agricultural value.

### **Crediton Neighbourhood Development Plan**

Whilst I understand that background work is underway, the plan has not advanced to a stage to be given any weight in the determination of the subject scheme.

### **Transportation and Accessibility**

A draft Transportation Assessment has been prepared and submitted as part of this package and sent to Devon County Council for comment. The Transportation Assessment fully considers the transport related impacts of the scheme, existing public transport provision, the suitability of access to such provision and how improvements can be made. Overall the draft reports confirm that the site is in a highly sustainable location for access to non-car modes of transport (including pedestrian links to employment, community facilities and the town centre) and is acceptable in terms of the proposed access arrangements and impacts on the network.

### **Flood Risk and Drainage**

The draft report confirms that there are no issues of concern in respect of flood risk, foul drainage or surface water drainage.

### **Ecological Impacts**

An extended phase one appraisal and species specific surveys has been undertaken and the report is being compiled. This confirms that in terms of ecological impacts the scheme fully complies with the Development Plan and the Framework.

### **Pre-application consultation**

It is anticipated that a meeting will be held with the Town Council as the scheme evolves.

### **Environmental Impact Assessment**

Given the size of the scheme and fact that the application site is not in a sensitive location I do not anticipate that an EIA will be required. A summary of the scheme against the ES regulations (as set out in the Amendment Regulations 2015) is set out below:

1. Development including more than 1 hectare of development that is not residential – this criterion is not met;
2. More than 150 residential units – this criterion is not met; or
3. Site area in excess of 5 hectares – this criterion is not met.

### **Planning Application Package**

I anticipate the planning application package to include the following information and would be grateful for confirmation if any further information is required.

- Completed application forms and red line plan;
- Illustrative Masterplan;
- Application parameter plans, indicative sections;
- Planning Statement, Report on Consultation and draft Heads of Terms for Planning Obligations;

- Design and Access Statement;
- Landscape and Visual Statement;
- Ecological Assessment;
- Flood Risk Assessment and Drainage Strategy;
- Transport Statement.

I would welcome the opportunity to meet and review the proposals in due course.

Yours sincerely

**Mark Scoot MRICS MRTPI**  
**For and on Behalf of**  
**Amethyst Planning Ltd**  
*Enc.*



4030/001 LOCATION PLAN, CREDITON

1:1250 on A3

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