



**Our Ref**      **DS/SJS/1530**  
**Date**          **10<sup>th</sup> February 2020**

**PCL Planning Ltd**  
13a-15a Old Park Avenue  
Exeter  
Devon  
EX1 3WD  
United Kingdom  
t: +44 (0)1392 363812  
www.pclplanning.co.uk

Forward Planning  
Mid Devon District Council  
Phoenix House  
Tiverton  
EX16 6PP

[planningconsultations@middevon.gov.uk](mailto:planningconsultations@middevon.gov.uk)

Dear Sirs,

## **MID DEVON LOCAL PLAN REVIEW – MAIN MODIFICATIONS CONSULTATION**

We have carefully considered both the main and additional modifications proposed by the Council.

### **Housing Delivery**

It is apparent that those modifications fail to satisfactorily deal with the matters of the inherent problem of a plan strategy that is dependent upon the timely delivery of new infrastructure. Since this infrastructure is a pre-requisite to the timely release of land for development and a clear pathway to achieving completions it was quite correct for this matter to be raised by the Inspector (as he did in his note of 21/05/19):

*"I require the Council to provide, for my analysis, a projected housing directory for Years 1-5 and 5-10 incorporating realistic assumptions about the delivery of the TCRR,...." (our underlining).*

However, as we pointed out in our response (dated 26/07/2019) to the Council's Housing Land Supply Update (ED20) the Council have not set out, in any depth, a set of realistic assumptions. Instead they have effectively eschewed those concerns. The Council rely upon the due diligence undertaken by Homes England through the HIF assessment process (see appendix D to ED20). In our experience that exercise relies heavily on the assumptions provided to HE by the Council. We have not seen the DCC work programme referred to (at section 6 of ED22) therefore, so far as we are aware, there is no substantive timescale before the examination to deal with the identified matters of:

- Land assembly (in particular)
- Planning application (preparation/submission and determination)
- Construction period (particularly bearing in mind the ground conditions)

that enables scrutiny of the realism of the assumptions that have been passed to HE.

Our concern is that the Council rely upon a 'rose tinted' view of likely completions from Cullompton in their projected housing land supply.

Therefore, in our opinion, the plan has not been realistically prepared and will therefore not be effective.

### **G&T sites**

The second issue that serves to inhibit timely completions is that of the Council's policy in relation to G&T pitch provision. The Inspector clearly understood the implications of the Council's policy approach (in the light of the policy and practice of lending institutions) and clearly advised the Council to 'decouple' their approach to the provision of housing sites and G&T sites.

Again the Council have eschewed this advice and the modifications proposed fall well short of what is necessary to achieve this 'decoupling'.


### **Conclusion**

It is unfortunate that the Council have, rather stubbornly, decided to continue with their preferred policies, as opposed to amend them in a substantive manner to satisfactorily deal with the two problems identified above.

Both of these issues drive to the heart of soundness tests (hence why the Inspector pointed out that main modifications were necessary to deal with them).

In our opinion it is clear that since the Council have declined the opportunity to propose suitable modifications it should be concluded that the proposed plan will not be effective, having regard to the tests of soundness at paragraph 35 of the Framework (since it is not deliverable over the plan period).

Kind regards,



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

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