

32/4654

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MM03  
MM42  
MM43  
MM45

**COMPLETE**

**Collector:** Main Mods Live Survey (Web Link)  
**Started:** Wednesday, January 29, 2020 9:47:53 AM  
**Last Modified:** Wednesday, January 29, 2020 9:51:56 AM  
**Time Spent:** 00:04:03  
**IP Address:** [REDACTED]

AM-  
13  
16  
18

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21  
24  
71  
85

**Q1 Personal Details**

Title	Mr
First Name	Neal
Last Name	Jillings
Organisation (where relevant)	Place Land
Address Line 1	Hitchcocks HQ
Address Line 2	Willand
Address Line 3	CULLOMPTON
Address Line 4	Devon
Post Code	EX15 3FA
Telephone	[REDACTED]
E-mail Address	[REDACTED]

**Q2 Agent Details (if applicable)**

Respondent skipped this question

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**Q3 Name or Organisation**

Place Land

**Q4** To which Main Modification consultation document does this representation relate? Please tick one box only (please complete a separate survey for each document you are commenting on)

**Schedule of Proposed Main Modifications**

**Q5** Please indicate the schedule reference (e.g. MM01) in the above document and the Policy number (e.g. DM1) to which your representation relates (please complete a separate survey for each schedule reference you are commenting on):

Reference Code	<b>MM03</b>
Policy	<b>S2</b>

**Q6** The Local Plan Review 2013 – 2033 is required to be assessed against the tests set out in paragraph 182 of the 2012 version of the National Planning Policy Framework to establish whether it is ‘sound’ and complies with legal requirements. Please refer to the guidance notes above for further information on the tests of ‘soundness’. Do you consider the Local Plan Review to be:

	Response
Legally compliant	<b>Yes</b>
Positively Prepared	<b>Yes</b>
Justified	<b>Yes</b>
Effective	<b>Yes</b>
Consistent with national policy	<b>Yes</b>

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**Q7** Please provide your comments below

The expression of the S2 figure as a minimum is supported and reflects NPPF guidance and the Examination Inspector's advice

## Planning Consultation (DPD)

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**From:** Neal Jillings [REDACTED]  
**Sent:** 10 February 2020 20:18  
**To:** Planning Consultation (DPD)  
**Subject:** LP Review Modifications consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Rep

Dear Sir/Madam

I have tried to use your online form, but it is massively inconvenient and time consuming to have to fill in one's contact detail in relation to each comment made. Therefore, I am sending this email, but will attempt to make it easy to differentiate between comments on individual MMs and additional mods.

Main Mods

MM03

S2 - We support the expression of the S2 housing requirement figure as a minimum. This reflects the Inspector's advice and the NPPF.

MM42

SP2 – We support the modification to remove the tie to the J27 development. The housing development at SP2 represents an increase in the overall **district wide** housing requirement that resulted from the spatial strategy that included economic and employment led growth at J27. There is no sound reason why the housing cannot be delivered prior to the J27 development. For an authority that has a shortfall in housing delivery against the requirement as set out in adopted housing policy COR3 (covering the period 2006 to 2018) and emerging policy S2 (covering the period 2013 to 2018, as set out in Table 7), it is imperative that the LPA seek to approve deliverable housing developments without delay. This modification reflects the Inspector's advice and the NPPF(59).

MM43

Para. 3.224c – We support the modification to delete reference to works to the A361 as a requirement prior to development on the SP2 site. Such works have been confirmed as unnecessary by the local highways authority.

MM45

Inset map for Sampford Peverell – We acknowledge and support the need for the increase in the green infrastructure at SP2. We acknowledge that this has been undertaken to take heritage impacts into account.

Additional Mods

No. 13 – para. 2.2 – Supported

No. 16 – para. 2.4 – We support the recognition that not all commitments will translate into completions. This reflects reality.

No. 18 – Table 6 – A minor point, but Land at Old Butterleigh Rd has permission for 5 dwellings and will not be developed for the 8 dwellings shown in this table. Completions will not be until 2021/22. I am the applicant and will be building a self build house on one of the plots, so can state this categorically.

No. 21 – para. 2.7 – Given that the Inspector has clearly stating that he has significant concerns about the housing trajectory in the early years of the Plan and the LPA's follow up note on land supply, which proposes no significant

change to address this policy, time will clearly tell on whether the statement set out here has validity. The table referred to only provides comfort if one thinks that the trajectory figures are realistic. The delivery rates are significantly higher than has been achieved in the past. We object to the statement on what the table demonstrates. The tables demonstrates nothing other than, making certain assumptions, certain conclusions can be drawn.

No. 24 – para.2.10 – A trite point, but the historical windfall allowance may be a result of permissions delivered outside the plan that only resulted as the plan led system in the district was unable to deliver a five year supply of housing land. An extra 500 units across a 20 year plan period is not inconsiderable and this amendment states that the Plan doesn't need to plan for this housing growth, some of which is arguable a result of the previous plan not working in terms of housing delivery. It would be better and more sound for the Plan to plan for this growth.

No. 71 - Table 22 – Old Butterleigh Rd should change to 5 to reflect 17/00175/FULL, Broadlands should change to 16 to reflect 17/00878/MOUT, the site at Willand should be increased to 125 to reflect the appeal decision (18/00175/MOUT). Perhaps these should go into Table 23 as sites with planning permission?

No. 85 – Uffculme policies map – the plan should show the area covered by the two approvals for 90 dwellings in total.

Regards

**Neal Jillings BSc(Hons) MA MRTPI**  
**Place Land SW Ltd**



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