



Representations to Mid Devon Plan 2033 Proposed Main Modifications

On behalf of Mr P Brimacombe

February 2020

McMurdo Land Planning and Development Ltd
a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL



Contents

1. Introduction
2. Background
3. Mid Devon Local Plan Review 2013-2033 Proposed Main Modifications
4. Conclusion

Appendix 1 Site Map

1. Introduction

1.1 The Mid Devon Local Plan Review is now out to public consultation.

1.2 On behalf of our client, SG Brimacombe and Sons, McMurdo submits comments and observations to the Council.

1.3 We make particular reference to:

- MM03
- MM04

1.4 Our representations pick up on key themes of:

- The importance of supporting the rural economy through residential development;
- Importance of supporting rural sustainability and diversification.

2. Background

2.1 An opportunity for public consultation on the findings of the independent review and proposed amendments to the Sustainability Appraisal, took between 28th February and 11th April 2018.

2.2 As a summary, our client made representations to that document as follows:

- COR17 Villages: Replaced by Local Plan Review S13: Villages
- COR18 Countryside: Replaced by: Local Plan Review S14: Countryside
- The suitability of particular tranches of land in Yeoford for development.

2.3 Our client's representations picked up on key themes of:

- The importance of allowing farm diversification;
- The importance of supporting the rural economy through development;
- Importance of supporting edge of settlement development to support rural sustainability and diversification;
- Development strategies which support development around sustainable transport nodes such a railway station should be supported (as seen with the success to the east of Exeter where stations at Honiton, Whimple, Feniton, Cranbrook led to quality sustainable development and quality of life for residents and whilst underpinning rural businesses and services)

2.4 At this stage, our client put forward land for consideration (see Appendix 1) that directly adjoined the settlement edge. Thus, our client argued that the policy wording as it currently stood was arbitrary and should be amended to reflect that small-scale developments within rural areas could and should, be supported not only within the settlement limits but also adjoining them. This would allow sites that were well linked to the existing settlement and its services to come forward on their individual merits.

2.5 Our client supported the inclusion of Yeoford as a village suitable for development but strongly argued that given Yeoford's strategic importance with respect of the railway station and the village amenities,

it could accommodate further growth, both within and on land adjoining the village. The policy itself stated that although Yeoford does not have a shop, it is considered appropriate for inclusion in Policy S13 due to its accessibility to other settlements and the availability of public transport including an hourly train service. It is our client's belief that this rail access should be capitalised upon to reduce vehicular commuting and increase the range of work options. Development strategies which support development around sustainable transport nodes such as railway stations should be supported (as seen with the success to the east of Exeter where stations at Honiton, Whimble, Feniton, Cranbrook led to quality sustainable development and quality of life for residents and whilst underpinning rural businesses and services).

2.6 In this context, our client urged the Council to specifically consider our clients land for residential development because:

- the land lies immediately to adjacent to the settlement edge and is well linked in terms of landscape and character;
- the land benefits from accessible road frontage;
- the land is well located close to the centre of the village and the railway station, thus highly sustainable;
- the land is of an appropriate size and is well screened;
- the development would deliver gains to benefit existing residents, such as the footpath into the village;
- development would not conflict with any national policy designations.

2.7 In December 2018 a proposal for Outline Planning for the erection of 5 dwellings on our client's land, to include new access and footpath link on land adjoining the settlement boundary in Yeoford was approved on the basis that the application accorded with the presumption in favour of sustainable development. When tested against paragraph 11 of the NPPF it was considered that the adverse impacts of the proposed development would not significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole. This further demonstrates the suitability of Yeoford as a sustainable location for rural development.

3. The Mid Devon Local Plan 2033 – Proposed Main Modifications

3.1 We provide comment on the Main Modifications on behalf of our client, as follows below:

MMO3 S2: Amount and distribution of development

3.2 MM03 “The diverse development needs of the community will be met through the provision of a **minimum** of approximately 7,860 dwellings and 154,000 square metres of commercial floorspace between 1st April 2013 and 31st March 2033.

3.3 In response to the Inspector’s post hearings advice note ...”content that the OAN figure of 78 (393pa) is soundly derived, as is the extent of commercial development envisaged. That said, while I appreciated the headroom allowed for, to comply with the (2012 version of) the Framework, these figures must be expressed as a minima in Policy S2.”

3.4 Observations

3.4.1 Our client supports the inclusion of a ‘minima’ wording within the policy S2 and the figure of 7,860 dwellings up to 2033.

3.4.2 However, our client continues to believe that the provision for growth in villages through allocating small and medium sites is integral to complying with NPPF Para 47 which states that in order to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. This will involve identifying strategic sites but also smaller deliverable sites to enable a spread of supply and to provide five years’ worth of housing against housing requirements with an additional buffer of 5% (moved forward from later in the plan period).

3.4.3 Moreover, the Plan states that smaller scale allocations in rural areas will help to bolster housing supply in the first five years of the plan, allowing a sufficient lead-in period for the larger town sites, which have more complex infrastructure and Masterplanning requirements. As such, our client reiterates how important the allocation of small, deliverable sites is to enabling the Council to maintain their housing target.

MM04 S3: Meeting housing needs

- 3.5 MM04: “The diverse needs of Mid Devon will be met through the provision of a **minimum** of 7,860 dwellings between 1st April 2013 and 31st March 2033.”
- 3.6 In response to the Inspector’s post hearings advice note: “...content that the OAN figure of 78 (393pa) is soundly derived, as is the extent of commercial development envisaged. That said, while I appreciated the headroom allowed for, to comply with the (2012 version of) the Framework, these figures must be expressed as a minima in Policy S2.”

3.7 Observations

- 3.7.1 Our client supports the inclusion of a ‘minima’ figure level and the figure of 7,860 dwellings up to 2033.
- 3.7.2 However, our client would reiterate that although the Plan sets out that rural areas are expected to accommodate approximately 10% of the housing requirement for Mid Devon up to 2033. Only 330 dwellings have been allocated and are considered available, suitable and achievable, capable of coming forward within the first 10 years of the plan which is clearly insufficient given that more than half of Mid Devon’s population currently resides outside its main towns.
- 3.7.3 Thus our client also questions whether the current Local Plan approach is truly a sustainable approach to maintaining the vitality and viability of rural settlements. It is inherently important to ensure that rural settlements are allowed to grow and develop in order to retain younger generations and allow new enterprise to flourish. Windfall developments cannot be relied upon to continue to bolster supply.
- 3.7.4 Our client believes that the provision for growth in villages through allocating small and medium sites is integral to complying with NPPF Para 47 which states that in order to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for housing in the housing market area. This will involve identifying strategic sites but also smaller deliverable sites to enable a spread of supply, sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period).

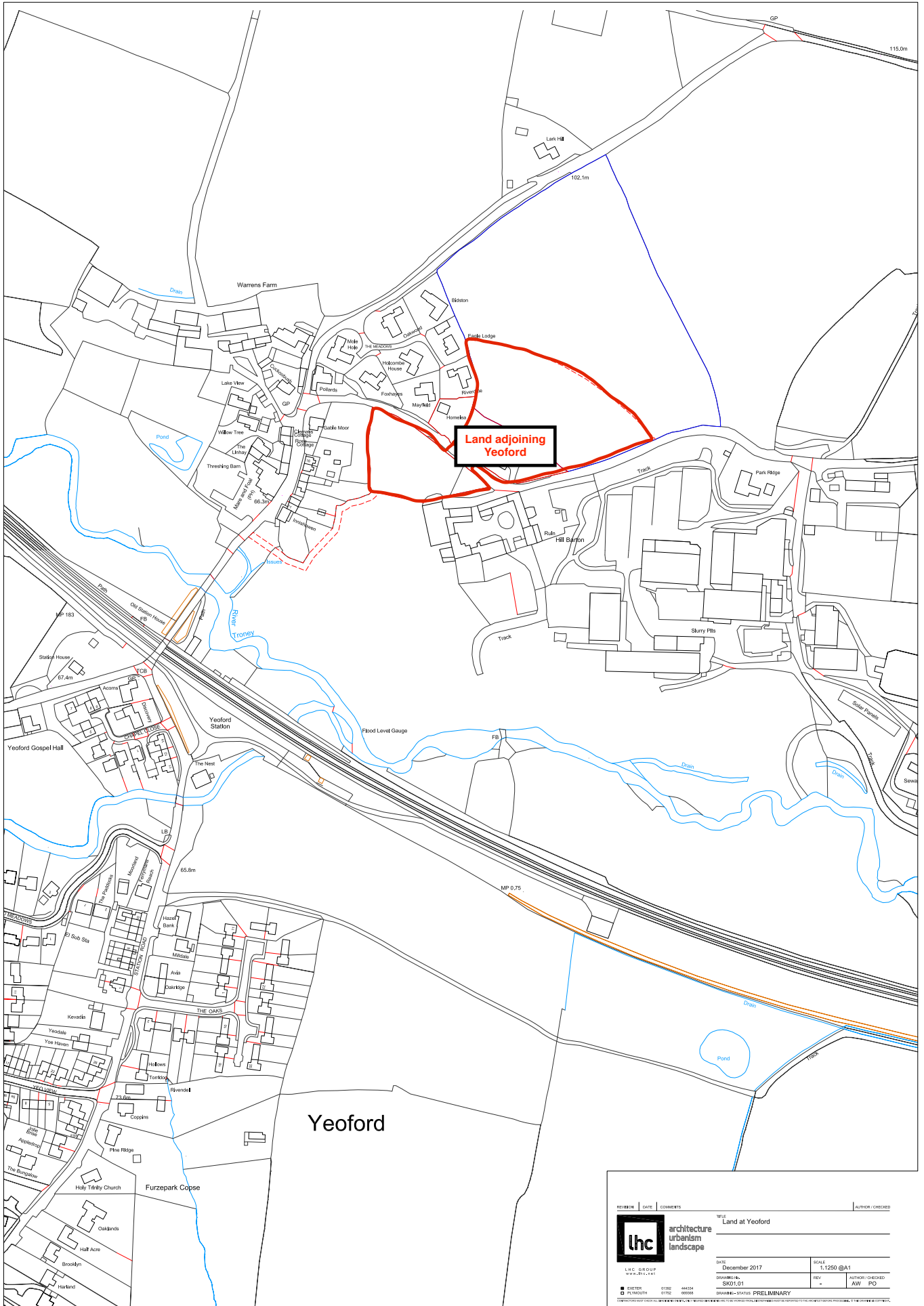
4. Conclusions


4.1 In summation, our client:

- Agrees with the Inspector that policy S2 and S3 should contain a “minima” wording; however, urges the Inspector to reconsider the low percentage figure attributed to housing outside the main settlements.
- Agrees with the Inspector that Yeoford is an appropriate location for the release of land to accommodate development needs especially given that it is a sustainable village with good facilities and extremely good rail connections to the wider district.
- Urges the Council to have the foresight to reconsider the potential for Yeoford to accommodate more development especially given that it has a railway station, placing Yeoford in a very strong strategic development position.
- Specifically asks the Council to allocate our client’s available and appropriately located land proposed for residential development. This residential development would have the following benefits:
 - Help to maintain much needed rural jobs and provide more much needed rural jobs by protecting the existing farm business and providing an opportunity for that business to grow and diversify;
 - support the wider rural economy and job creation through development;
 - supporting edge of settlement development to deliver rural sustainability and diversification;
 - Support the delivery of housing, including affordable housing for rural communities;
 - support development in a sustainable village with a railway station, which, as seen with the success to the east of Exeter (stations at Honiton, Whimble, Feniton, Cranbrook) has led to quality sustainable development and quality of life for residents and whilst underpinning rural businesses and services.

4.2 On behalf of our client, we thank you for the opportunity to comment and trust our comments will be given full consideration in due course.

Appendix 1. Site Map



REVISION	DATE	COMMENTS	AUTHOR / CHECKED
 architecture urbanism landscape			
TITLE: Land at Yeoford			
DATE: December 2017		SCALE: 1:1250 @A1	
DRAWING: SK01.01		REV: -	AUTHOR: (D)CROOK AW PO
DRAWING STATUS: PRELIMINARY			



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