



Representations to Mid Devon Plan 2033 Proposed Main Modifications

On behalf of GPG Developments

February 2020

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



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1. Introduction

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

1.2 On behalf of our client, GPG Developments, 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 economy of Crediton through residential led mixed-use development;
- Importance of supporting rural sustainability and diversification.

2. Background

2.1 Our client, GPG Developments, controls an area of land designated for residential and commercial uses within the Wellparks allocation in Crediton.

Policy CRE1 Wellparks

A site of 22.9 hectares at Wellparks, A377 is allocated for residential and commercial development subject to the following:

- a) 185 dwellings with 28% affordable housing on 7.9 hectares;
- b) 2,220 square metres of commercial floorspace in the south east part of the site;
- c) 15 hectares of Green Infrastructure on the upper slopes of the site;
- d) Layout, design and landscaping that reflects the sloping, visible nature of the site, locally distinctive design and the need to protect the setting of Downes Historic Park and Garden and respect the character and setting of the listed buildings at Wellparks and Downes House; and
- e) Improved pedestrian and cycle access to the town centre and facilities to the south of the A377

2.2 Land adjoining AL/CRE/1 Wellparks is a site of 18.3 hectares allocated for residential development, (185 dwellings with 35% affordable housing on 7.8 hectares- with 15 hectares of Green Infrastructure, on the upper slopes of the site and a shared use link to Commonmarsh Lane/Tolleys area)

2.3 In January 2020 the Wellparks Farmhouse and curtilage, which forms part of the aforementioned allocation, was subject to a Certificate of Lawful Use (CLU) Existing approval, confirming it's continued residential use. This approval cements the residential use of a large proportion of the land our client has control over. The adjacent listed barns are inextricably linked to the house and its curtilage, forming the original farm.

2.4 It is our client's intention to bring forward the site for residential led mixed-use development in line with the existing proposed allocation, within a 2-year timeframe.

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:

MM03 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 Our client supports the focus of development at Crediton, which is a crucial market town in the District and serves a wide area. Our client supports development on land within and adjacent to Crediton.

3.4.3 Our client reiterates how important the CRE1 allocation continues to be in providing a deliverable site within Crediton, enabling the Council to maintain their 5-year (and beyond) housing targets.

3.4.4 However, the housing target for Crediton only amounts to 10% of the district and this is considered to be insufficient. It is considered that other, more innovative solutions must be considered within the Plan, to deliver additional residential led mixed-use development, either on new or existing allocations within or adjoining Crediton.

MM04 S3: Meeting housing needs

3.4 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.”

3.5 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.”

3.6 Observations

3.6.1 Our client supports the inclusion of a ‘minima’ figure level and the figure of 7,860 dwellings up to 2033.

3.6.2 Our client supports the focus of development at Crediton, which is a crucial market town in the District and serves a wide area. Our client supports development within and adjacent to Crediton.

3.4.3 Our client reiterates how important the CRE1 allocation continues to be in providing a deliverable site within Crediton, enabling the Council to maintain their 5-year (and beyond) housing targets.

3.4.4 However, the housing target for Crediton only amounts to 10% of the district and this is considered to be insufficient. It is considered that other, more innovative solutions must be considered within the Plan, to deliver additional residential led mixed-use development, either on new or existing allocations within or adjoining Crediton.

3.4.5 This would also boost the provision of affordable housing targets as set out in this policy.

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 Crediton.
- Agrees with the Inspector that Crediton is an appropriate location for development to accommodate development needs, especially given that it serves a wide area in terms of employment, education and shopping for the district.

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 - Wellparks



Project: 116
 Wellparks Farm
 Crediton
 Drawing No: B 04
 Date: November 2019
 Scale: 1:500 @A2
 Drawn: AGJ
 Checked: JJ

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