



Hearing Statement

Plymouth & South West Devon
Joint Local Plan Examination

Matter 8

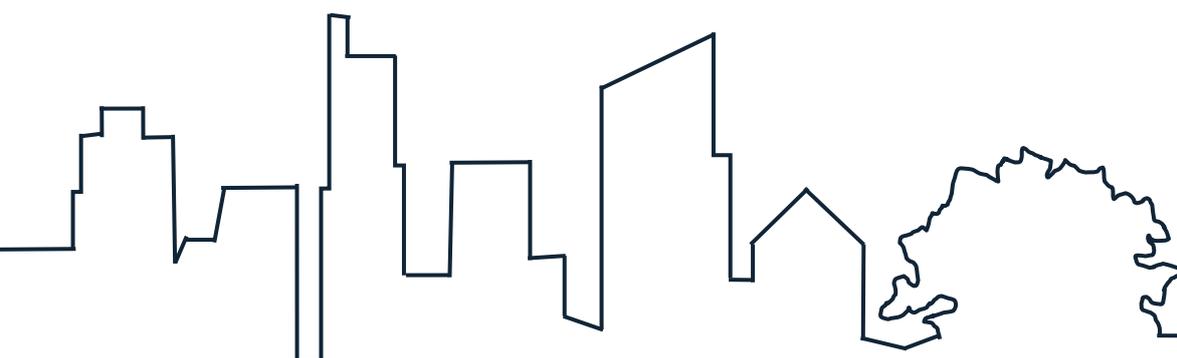
On behalf of Bovis Homes Ltd
Person ID: 1095563

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Walsingham Planning

1 Gas Ferry Road
Bristol
BS1 6UN

Telephone
01173 252000



bristol@walsingplan.co.uk
www.walsinghamplanning.co.uk

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1		First draft		
2		Second draft		
3		Final draft		

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APPENDICES

APPENDIX I – Site Location Plan

I INTRODUCTION

- I.1.1 This Hearing Statement has been prepared by Walsingham Planning, formerly Ian Jewson Planning Ltd (IJP) on behalf of Bovis Homes Ltd and relates to the Plymouth and South West Devon Joint Local Plan (JLP) Examination. Walsingham Planning previously submitted representations in relation to earlier stages of the consultation process including the Regulation 19 documents.
- I.1.2 Bovis Homes has a specific interest in relation to land at Callington Road, Tavistock which comprises part of the strategic mixed use allocation allocated under Policy SP23a of the Adopted West Devon Core Strategy. Outline planning permission has now been granted for the site under LPA reference 00554/2013/O for a mixed use development including up to 750 dwellings. Pre-application discussions have been held with West Devon Borough Council in relation to the approval of reserved matters and submission of these details are anticipated shortly to enable construction of houses to commence.
- I.1.3 Additional land outside but directly adjacent to the outline application area known as Callington Road (Site B) is also within the control of Bovis Homes (as edged red on the plan attached at **Appendix I**). It is recognised that the additional land is not a specific matter for the Examination but reference to it is included to explain the context of the Bovis Homes proposals.
- I.1.4 This Statement addresses matters identified by the Inspector in the Matters, Issues and Questions (November 2017) where considered relevant and highlights issues which are still considered to be of concern in relation to the soundness of the plan.
- I.1.5 We note that since the Regulation 19 document, a number of additional documents have been published on the JLP Examination website, including:
- New Housing Trajectories updating base date to March 2017 (Reference: TP3E, TP3F, TP3G).
 - TTV Trajectory agreement document (Reference: TP3I).
 - Summary of Allocated and Rejected Sites (Reference: EXC3D).

I.1.6 Reference is also made to these documents where relevant.

2 MATTER 8: POLICY AREA STRATEGIES: THRIVING TOWNS AND VILLAGES

2.1 Approach to development (Policies TTV1 and TTV2)

- i. Is the hierarchy of sustainable settlements in Policy TTV1 and the settlements within each level of the hierarchy identified in the supporting text justified? Is the assessment framework used to determine if a settlement is ‘sustainable’ appropriate and justified?**

2.1.1 We are in general support of the settlement hierarchy, however we raise concerns with the proposed distribution of development, and consider further sites should to be allocated in the ‘Smaller Towns and Key Villages’ (second in hierarchy), and in particular the in larger towns such as Tavistock (explained further below in response to question iii c).

- ii. Where settlement boundaries are identified are they justified and do they take account of any outstanding planning permissions?**

2.1.2 No comment.

- iii. Figure 5.1 on p176 of the JLP identifies site allocation totals by settlement type and also includes an allowance for Sustainable Villages.**

- a. Can the figures be updated to 2017? Would their inclusion within Policy TTV1 aid certainty?**

2.1.3 Bovis Homes welcome that new trajectories have been submitted with a base date of March 2017. It will be important that the relevant figures in the JLP are updated to reflect the new evidence. The figures should also be included within Policy TTV1 to ensure greater certainty. At the very least reference should be made to Figure 5.1 in Policy TTV1.

2.1.4 In addition, as set out in our Regulation 19 representations, the site allocation totals identified in Figure 5.1 should be expressed as ‘minimum’ requirements to allow flexibility in delivery to ensure local needs are met and to boost significantly the supply

of housing. This will also accord with Policy SPT3 (Provision for new homes) which sets out the overall housing requirement as a 'minimum'. We acknowledge that the housing requirements in Policy SPT3 are expressed as 'at least' however it will be important to ensure a consistent approach across all policies relating to the delivery of housing in the plan period. Therefore, Policy TTVI and Figure 5.1 should be updated accordingly.

b. As the figures only relate to allocations how much development is proposed to be delivered through existing uncompleted commitments?

2.1.5 No comment.

c. How has the distribution of development across the settlements been determined and is it supported by evidence?

Housing Requirement

2.1.6 Policy TTVI sets out the settlement hierarchy and the distribution of development in the TTV.

2.1.7 As set out in our Hearing Statement relating to Matter 3 (Housing) Bovis Homes raise concerns with the housing requirement proposed in Policy SPT3 which has not been based on a robust objectively assessed need (OAN) and in particular the significant reduction from 30,300 dwellings to 26,700 dwellings which does not adequately reflect the government's agenda for boosting the supply of housing. The proposed reduction in the overall housing requirement across the HMA is concerning and will potentially result in significant housing supply issues.

2.1.8 This will also have implications on other policies in the JLP including the distribution of development set out in Figure 5.1 which supports Policy TTVI. It will be important this is updated to ensure housing needs are properly met, with a particular emphasis on the 'Smaller Towns and Key Villages' such as Tavistock which is one of the larger sustainable towns with further capacity for growth.

Distribution of Development

- 2.1.9 Policy TTV1 sets out the settlement hierarchy and the distribution of development in the TTV. It is proposed that most of the TTV growth should take place in the ‘Main Towns’ after Plymouth. While this is a logical approach it is important to make sure that it is not to the detriment of sustainable growth at the large towns elsewhere.
- 2.1.10 We are concerned that the housing numbers presented in Figure 5.1 may not reflect the true housing requirement over the JLP period (see the Lichfields Hearing Statement relating to Matter 3), nor does there appear to be any objective assessment informing the distribution of housing across settlement types. Further evidence should be provided to support the proposed distribution of development.
- 2.1.11 The ‘Main Towns’ are allocated a higher amount of new homes in the plan period with 4,471 to be delivered in the plan period which is a logical approach based on the level of services, facilities and employment opportunities available in these settlements. However, we have concerns regarding the allocation of sites in the ‘Main Towns’ located in the floodplain/AONB which should be discounted unless it can be demonstrated that there are no other reasonable options available.
- 2.1.12 Policy TTV1 identifies the ‘Smaller Towns and Key Villages’ as areas “*which will receive support for growth commensurate with their roles in supporting the small villages and hamlets*”. Figure 5.1 sets out the site allocation totals by settlement type which sets out a requirement to provide 970 new homes in the ‘Smaller Towns and Key Villages’ in the plan period.
- 2.1.13 We consider that there is potential to achieve more than the 970 units proposed in the ‘Smaller Towns and Key Villages’ in the plan period. This is particularly the case for Tavistock.
- 2.1.14 As set out in our previous representations submitted in relation to the Regulation 19 consultation (April 2017), towns such as Tavistock have a significant level of local facilities and employment opportunities meaning development can take place which will drive the economic growth of the area. Growth in the larger towns will also lead to the creation and strengthening of sustainable communities and settlements.

- 2.1.15 Tavistock in particular has a number of suitable locations which are appropriate for development (such as Land off Callington Road 'Site B' adjacent to the SP23a allocation) and these should be the focus of growth to ensure that the local community continues to thrive. In addition Tavistock will benefit from a reinstated rail line to Plymouth as part of the SP23a allocation which will further improve the sustainability of Tavistock. As one of the two most sustainable settlements in West Devon, Tavistock would be the logical place to accommodate a large share of the additional development.
- 2.1.16 We therefore suggest that the proposed housing requirement for the 'Smaller Towns and Key Villages' should be increased. In addition, the proposed number of dwellings for the 'Smaller Towns and Key Villages' should be separated as the current distribution is far too simplistic.
- 2.1.17 Further, Bovis Homes also has concerns regarding the proposed approach to housing provision in the 'Sustainable Villages' (third in the hierarchy) which are allocated to deliver 720 new homes in the plan period. The JLP does not specifically allocate sites for development in the 'Sustainable Villages' and instead primarily relies on delivery of allocations through future Neighbourhood Plans. This provides no certainty that sufficient levels of market and affordable housing will come forward in those settlements. We also raised concerns with this approach in our previous representations.

Soundness of the Plan

- 2.1.18 Overall Bovis Homes do not consider the JLP to be sound because the distribution of development set out in Figure 5.1 which accompanies Policy TTV1 is not justified based on available evidence and further growth should be allocated in the 'Smaller Towns and Key Villages'.
- 2.2 **Housing delivery in the TTVPA (Housing site allocations [Policies TTV5-6, TTV8-11, TTV13-15, TTV18, TTV21-22, TTV24 and TTV26-29], housing trajectory and Policy DEV8)**

i. In relation to housing site allocations proposed for development within the TTVPA:

2.2.1 As set out in our Regulation 19 representations, the continued identification of adopted Policy SP23a for a mixed use development under JLP Policy TTV21 (Callington Road, Tavistock) is welcomed. However, objection is raised to the content of the evidence base documents that has been prepared to support the JLP.

2.2.2 We consider points a-d of *question i* in relation to a number of site allocation policies in Tavistock.

a. Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?

2.2.3 Policy TTV 21 identifies Land at Callington Road, Tavistock as a residential led development with provision made for ‘in the order of 600 dwellings’.

2.2.4 As set out in our Regulation 19 representations Bovis Homes raise concerns with the dwelling yield proposed. The Site Information Pack for Tavistock Parish (July 2016) states the following in respect of SP23a:

“Although there are number of constraints, mitigation measures are in place to overcome these. Some of these measures are likely to reduce the yield of development on the site. As such, it is considered there could be potential for approximately 635 dwellings and associated facilities (e.g. play areas, shop, primary school, railway station)”.

2.2.5 It is assumed that this has resulted in the dwelling yield being reduced to ‘in the order of 600 dwellings’. The Joint Councils Schedule of Representations (Reference: SUB22B) suggests that the policy wording contains flexibility in terms of the overall number of homes which can be delivered.

2.2.6 However, we note that the site has outline permission for up to 750 dwellings on the SP23a area. Furthermore, the Environmental Statement and other information submitted in support of the planning application confirmed that there are no technical constraints to delivering this quantum of development. Bovis Homes has also

commissioned the first stage of the detailed layout design work for the site which will support the reserved matters submissions and this has also confirmed that 750 dwellings can be achieved on site.

- 2.2.7 Therefore, to ensure the scale of housing proposed is justified the wording of Policy TTV 21 should be amended to include provision for ‘up to 750 dwellings’ instead of ‘in the order of 600 dwellings’.
- 2.2.8 As set out in our Regulation 19 representations Land off Callington Road (Site B), Tavistock (WD_45_14_08/13) is located directly adjacent to the SP23a allocation which has outline planning permission for a mixed use development comprising up to 750 dwellings, a primary school site, a local convenience store and railway station related development (to serve the reinstated rail line).
- 2.2.9 Whilst it is acknowledged that alternative sites will not be considered at this stage, this additional land represents a logical and sustainable location for additional development which can be delivered as a comprehensive development with SP23a. This in comparison to other less suitable sites in Tavistock such as the proposed allocation at Kelly College Preparatory School (Policy TTV 24).

b. Is the housing trajectory (TP3C) realistic for each allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?

- 2.2.10 The updated TTV trajectory (TP3G) suggests the Callington Road site (TTV 21) has a net site capacity of 600 dwellings with this quantum to be delivered in the plan period. As set out above the site has outline planning permission for up to 750 dwellings, which can be delivered in the plan period. The trajectory should be updated accordingly.

c. Are the specific development requirements of each site allocation policy effective and justified by evidence?

- 2.2.11 As set out above Policy TTV21 should be amended to include provision for ‘up to 750 dwellings’ to ensure it is policy effective and justified.

d. Will the allocations achieve sustainable development?

- 2.2.12 Policy TTV21 has potential to achieve sustainable development comprising ‘up to 750 dwellings’ which should be reflected in the policy wording.
- 2.2.13 In addition it is unclear why land immediately adjacent to the Policy SP23a allocation has not been identified for development whilst other less sustainable sites are. For instance development at Kelly College Preparatory School (Policy TTV 24) cannot be considered the most appropriate strategy when considered against reasonable alternatives. The Site Information Pack for Tavistock Parish (July 2016) states that it is “*Isolated from services*”. In comparison Land off Callington Road (Site B), Tavistock (VD_45_14_08/13) is located directly adjacent to the SP23a allocation which has outline permission which is considered to be a much more sustainable location for new development.

Soundness of the Plan

- 2.2.14 Overall Bovis Homes welcome the allocation of Land off Callington Road (Policy TTV21), however consider that the policy wording should be amended to ‘up to 750 dwellings’ instead of ‘in the order of 600 dwellings’ to ensure the Plan is justified.
- 2.2.15 In addition sufficient evidence has not been provided to justify the allocation of other sites in Tavistock instead of Land off Callington Road, (Site B).
- 2.2.16 As set out in the Hearing Statement on Matter 3 (Housing) and in our response to questions on the approach to development in relation to Policies TTV1 and TTV2 above, Bovis Home raise concerns with the overall housing requirement expressed in Policy SPT3 and the distribution of development, and it is likely more development will be required in the ‘Smaller Towns and Key Villages’ for the JLP to be sound.
- 2.2.17 Land off Callington Road (Site B) provides an appropriate location for additional development which can be delivered as part of a comprehensive development with SP23a which has planning permission for up to 750 dwellings, and would benefit from the infrastructure that is already committed, including a primary school and direct access to the proposed railway station.

- ii. **Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the TTVPA will be maintained and will deliver the requirement of Policy STP3?**

2.2.18 The NPPF outlines the importance of maintaining a five year land supply and providing robust evidence to demonstrate deliverability of the identified sites. Further sites should be allocated in the TTVPA which can deliver housing in the first five years to ensure a flexible supply of sites.

- iii. **Will the housing provision made within the TTVPA have a reasonable prospect of delivering its share of the five year housing land supply at the point of adoption of the JLP?**

2.2.19 No comment.

- iv. **Are the levels of affordable housing proposed in DEV8 supported by the evidence or would a higher figure be justified? In particular:**

- a. **Point 2 refers to the provision of 30% affordable housing, whilst point 3 refers to the provision of a ‘minimum’ of 30%. Is the difference in wording justified? Does the policy seek to deliver a higher % of affordable homes (above 30%) within the Main Towns and if so how will this be achieved?**

2.2.20 Bovis Homes support the policy as currently drafted as it will provide flexibility to deliver a higher affordable housing percentage within the main towns where appropriate. In other areas it will be important to ensure 30% affordable housing is kept as the maximum.

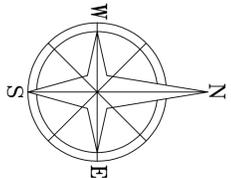
- d. **Is it clear that the affordable housing requirements are subject to viability and Policy DEL1?**

2.2.21 To ensure a flexible approach the policy should be amended to reflect the need for viability to be considered (where relevant), as follows:

“The LPAs will seek to deliver a wide choice of high quality homes which widen opportunities for home ownership, meet needs for social and rented housing, and

create sustainable, inclusive and mixed communities. The following provisions will apply (subject to viability):

APPENDIX I – SITE LOCATION PLAN



<p>By _____</p> <p>Permeage Authority Approval Date _____</p> <p>Highway Authority Approval Date _____</p> <p>Drawn from the drawings, the contractor shall be responsible for any errors or omissions in the drawings, and shall be responsible for any errors or omissions in the drawings, and shall be responsible for any errors or omissions in the drawings.</p>	
<p>BOVIS HOMES</p> <p>Bovis Homes Limited South West Region Bishops Cleeve, Cheltenham, Gloucestershire, GL52 8JS Tel: 01242 682400 Fax: 01242 682850 DX: 137901 Bishops Cleeve 2</p>	
<p>Callington Road South Tavistock</p>	
<p>SP32a EXTENSION LAND</p>	<p>REV A</p>
<p>DATE AUGUST 2013</p>	<p>DRAWING NO. _____</p>
<p>CHECKED/DATE _____</p>	<p>SCALE: 1:250 @ A1</p>