

Local Plan Review

Scoping Report

July 2013



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Introduction

1.1 Mid Devon's Development Plan includes the local policies that determine how much development should take place, what type and in which locations. The current Core Strategy (adopted in 2007) contains targets for the level of development such as house-building and employment growth up to 2026, based on technical assessments of need and demand. The adopted Allocations and Infrastructure Development Plan Document (AIDPD, adopted 2010) allocates land for development to meet those targets. Because the first part of the current plan was adopted six years ago it now needs to be brought up to date. The Council is therefore reviewing the targets, allocations and policies contained in the current plan to reflect the current needs and aspirations of Mid Devon and its residents.

1.2 This consultation document provides information about Mid Devon, the existing adopted planning policies and the options for how these might be revised through the Local Plan Review. The plan-making process must incorporate up-to-date evidence and information about the district, leading to policies that are positively prepared, justified, effective and consistent with national policy. At this initial stage, the evidence base for the Local Plan is in the process of being updated and where key information is not yet known, this is explained in the relevant section. This evidence will enable the Council to gauge the level of development that is needed and decide where any new development should be located.

1.3 As a first stage in preparing the new Local Plan the Council is seeking the views of local residents and other key stakeholders on the potential scope and content of the plan. The process for preparing the new plan is set out in detail in the recently approved Local Development Scheme (LDS) which is available on the website at www.middevon.gov.uk/lids. Following consultation on this scoping report, further consultation will take place when draft policies have been prepared (January-February 2014), and published in final form (October-November 2014). The new Local Plan will then be subject to Examination under an independent Inspector prior to its adoption by May 2015.

1.4 Although this report sets out some initial broad options, alternatives are likely to present themselves as the plan evolves and new national policy and guidance are published. At the same time as this consultation the Council is consulting on the scoping document for the Sustainability Appraisal of the new Local Plan.

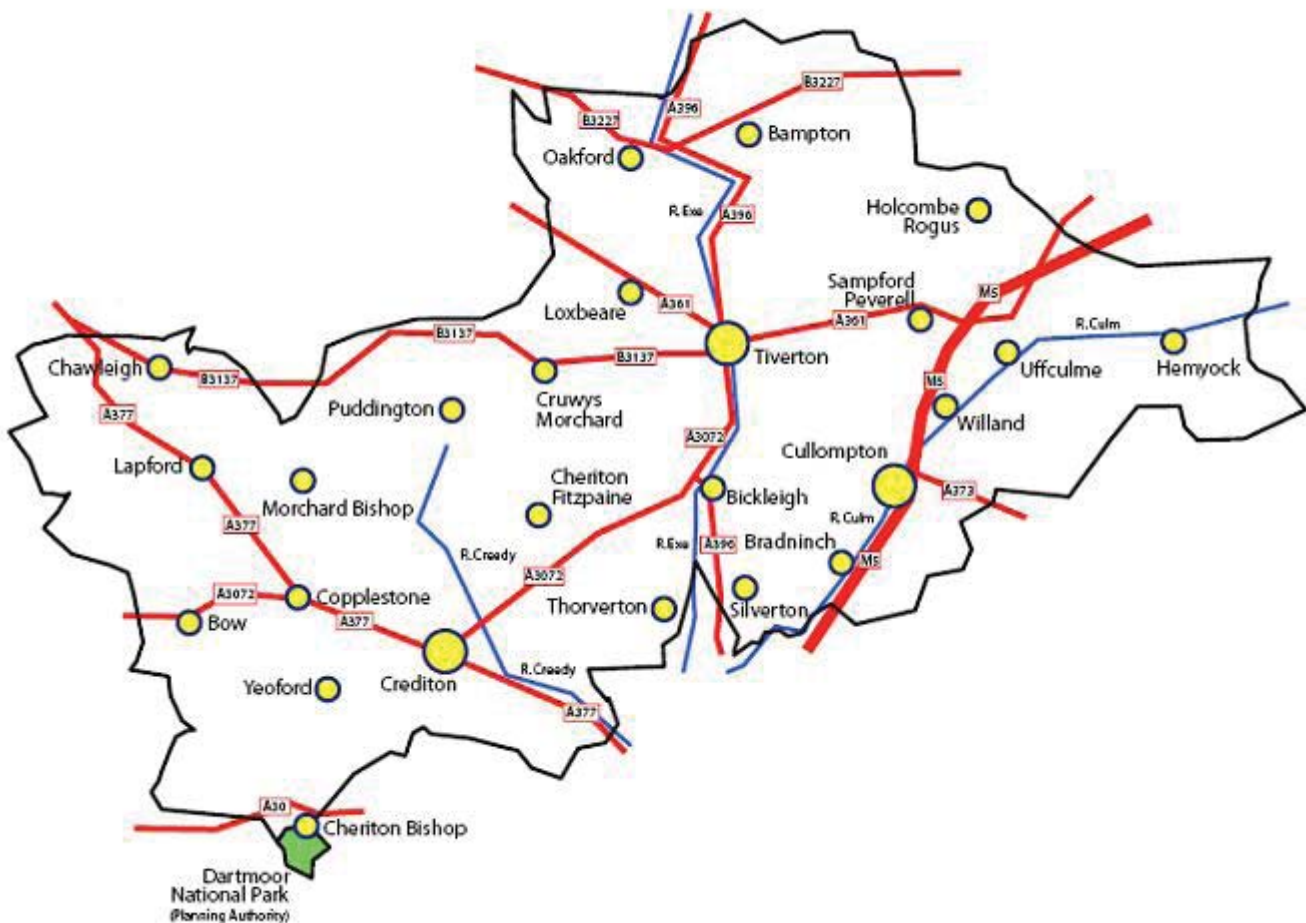
Facts and Figures: Mid Devon district profile

1.5 The following information includes extracts from the Council's most recent Annual Monitoring Report for the period 1st April 2011 to 31st March 2012. Annual Monitoring Reports are published in December each year, for the preceding financial year.

Location and physical characteristics

1.6 Mid Devon District Council covers an area of 352 square miles (913 square kilometres) of which the hilly, agricultural landscape is the area's defining characteristic. Most of the district's rivers drain southwards in steep-sided valleys into large expansive floodplains. Major transportation routes run through the district, in particular the M5 motorway which cuts through the east, whilst the Great Western Rail Line connects Penzance-London Paddington, stopping at Tiverton Parkway Railway Station.

1.7 The district is one of the most sparsely populated local authorities within England and Wales, with a large number of residents living outside of the three largest towns. The principal concentration of people is in the eastern part of the district, where the market towns of Tiverton and Cullompton lie within 6 miles of each other. Crediton is the largest settlement in the west of the district, whilst Bampton is a smaller centre serving the large rural hinterland in the north.

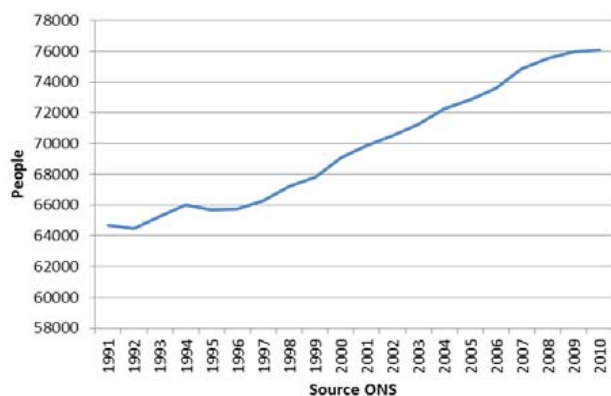


Population and housing

1.8 The 2011 Census shows that Mid Devon’s population rose by 11% in the ten years since the last census. This rate is significantly higher than the rates elsewhere. Forecasts show that this population trend is expected to continue with a further 15% increase between 2011 and 2031, as illustrated below.

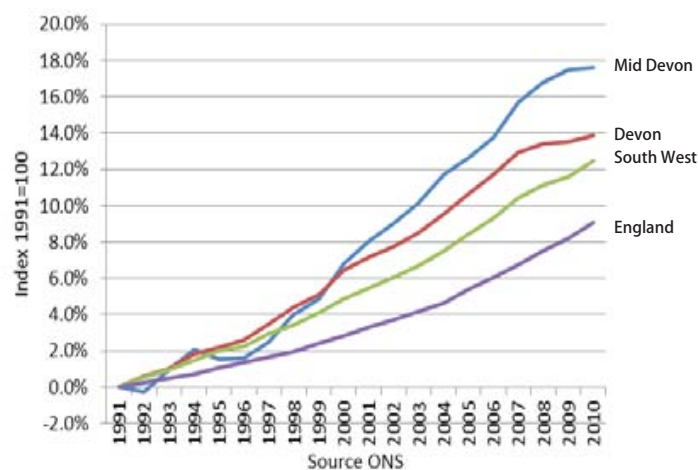
Population

Source: What Households Where (DCLG/ONS)



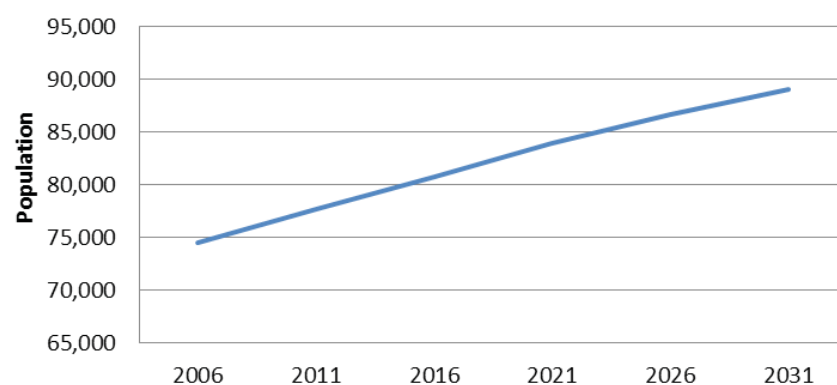
Population change compared with country, region and England

Source: What Households Where (DCLG/ONS)



Forecast population growth in Mid Devon

Source: Devon County Council

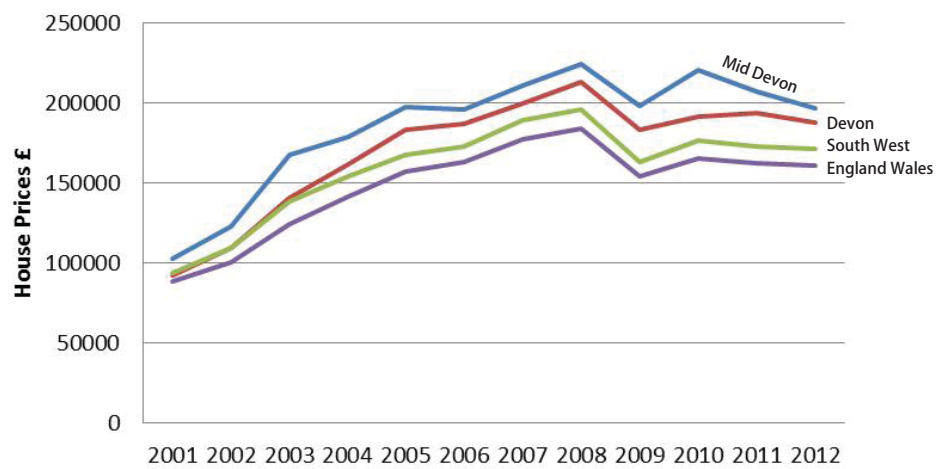


1.9 As well as Mid Devon's population increasing the population's average age has increase from 41 to 44 and remains higher than the UK average which is now 39. Whilst overcrowding has risen slightly to 4.4% it remains well below the figure for England and Wales of 8.5%. The 2011 Census also showed that 20.3% of households include a member with a disability.

1.10 Affordability remains a critical issue as house prices in Mid Devon are higher than the averages for Devon, the South West and England and Wales, as can be seen in the following graph:

Source: Land Registry

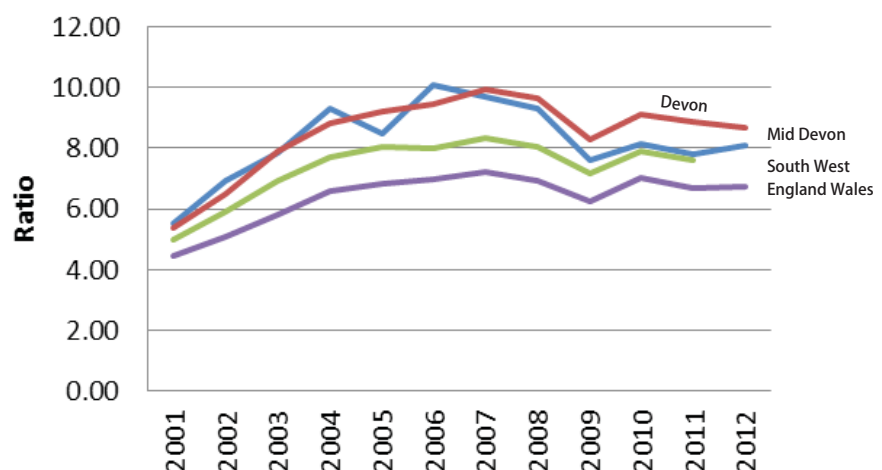
1st Quarter House Prices (Jan-March)



1.11 While house prices have fallen slightly since the economic downturn, average 2011 house prices were still 89% higher than they were in 2001. There are also signs that the ratio of house prices to earnings is rising again, with fewer people now in full-time employment.

Source: ONS

Ratio of median house prices to earnings

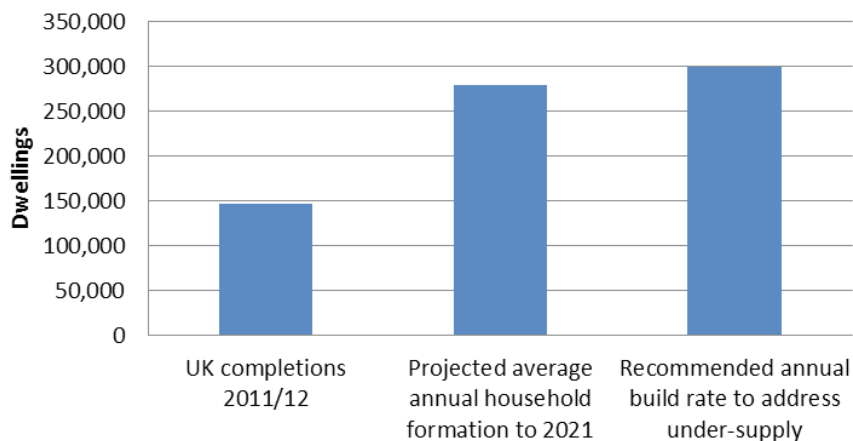


1.12 The Mid Devon Local Housing Needs and Demand Survey 2011 indicated a need for 335 additional affordable dwellings each year to address the backlog of unmet need over the last 10 years. Over that 10 year period, total housing completions in Mid Devon averaged 349 dwellings per annum, the majority of these being market rather than affordable dwellings. Existing plans allocate sufficient land to meet the strategic target of 6,800 dwellings up to the year 2026, but other factors such as mortgage and developer finance availability will have had an impact on housing delivery since 2009.

1.13 Nationally there is concern that house price inflation in the last decade was driven by long-term chronic under-supply of housing to meet the needs of a growing population. As a result the Government is now urging Councils to significantly increase their levels of housing delivery. The following graph shows the current UK situation.

Source: ONS and Future Homes Commission report, Building the Homes and Communities Britain Needs (2012)

National housing crisis



1.14 The Council intends to commission a new Strategic Housing Market Assessment in partnership with some of our neighbouring district councils. This will provide definitive, up-to-date information on the level of housing need and demand across the Exeter Housing Market Area, allowing the Council to allocate sufficient sites in the Local Plan Review

Economy

1.15 The majority of Mid Devon's employment falls within the service sector, which includes occupations where knowledge and time are offered to improve productivity. Examples include transport and distribution, retail and services such as accountants or building surveyors. This sector accounts for 76.7% of Mid Devon employment (Economic Trends Report, August 2012).

1.16 There are low levels of inward commuting and a strong 'pull' from neighbouring urban areas, especially Exeter. Forthcoming data release from the 2011 Census will provide up-to-date information about travel-to-work patterns. The available information from the Annual Population Survey (2008) estimates that of the people working in Mid Devon, only 25% commute in from outside the district, while only 57% of Mid Devon's working residents stay in Mid Devon for work.

1.17 The district profile produced for the Local Economic Assessment (2012) found that there is a high level of self-employment within Mid Devon, and the district is above the Devon average for business density (number of businesses per working age person) and business start-up. While school-level attainment is above average for the county, this does not translate to a highly skilled resident workforce, implying that high-attaining school leavers are not staying in Mid Devon. Business survival rate was 3.5 percentage points lower in 2010 than the Devon-wide average. Estimates by the Office of National Statistics (ONS) put Mid Devon's jobs density at 62 jobs per 100 resident population aged 16-64, compared to 82 across the South West and 83 across Devon. To reach the county average, Mid Devon needs significant growth in jobs.

1.18 Evidence of the retail and employment characteristics of Mid Devon has been explored further in the Retail Study (2012) and Employment Land Review (2013), the findings of which are discussed later in this document.

Biodiversity

1.19 Devon's great variation in geology and landform encourages considerable biodiversity. There are various protected species found in Mid Devon, such as woodlark, bats and dormice. In comparison with the rest of Devon, Mid Devon has relatively little land designated as being of national importance and no designated or candidate European sites. Within Mid Devon there are 12 Sites of Special Scientific Interest (SSSI), three local nature reserves and two nature reserves managed by Devon Wildlife Trust. Mid Devon has over 8 km² of ancient woodland. The district supports a range of important wildlife including over 200 County Wildlife Sites and Regionally Important Geological Sites. The wider landscape contains a network of species-rich hedgerows, woodlands and river valleys linking up designated and priority habitats. To the east of the district lies the Blackdown Hills Area of Outstanding Natural Beauty, which is highly valued not only for its visual qualities but also for its geology, biodiversity and human heritage. The Blackdown Hills support species and habitats such as purple moor grass and rush pastures that are in rapid decline in the UK.

1.20 Changes in wildlife populations and habitat have occurred throughout the last century and show a general trend of decline. The main threats to biodiversity include environmental pollution, land use change, fragmentation and invasive species introduction. These pressures are likely to continue and biodiversity may also be affected by climate change and recreational pressure. Hedgerow removal and unsympathetic conversion of rural buildings can impact on important species identified in the Devon Biodiversity Action Plan.

1.21 The South West Nature Map provides a strategic approach to habitat protection, enhancement and creation, allowing for adaptation to climate change. Areas suitable for such actions include native woodland, lowland heath, floodplain grazing marsh and purple moor grass and rush pasture. The Devon Green Infrastructure Strategy and the Mid Devon Green Infrastructure Assessment (GIA) identify the different habitats in the district as well as land performing other important functions such as recreation and flood attenuation. The GIA analyses the differing types and amounts of green infrastructure across the district, which may be used as a basis for investment decisions.

Heritage

1.22 Mid Devon's environmental richness is enhanced by the historic and built environment, with 2568 listed buildings, 50 Conservation Areas and 49 Scheduled Monuments within the district. In addition, there is a wide range of archaeological remains which are not scheduled.

1.23 The majority of listed buildings and conservation areas are concentrated in the historic cores of the towns and villages. These incorporate attractive green links via parks, cemeteries, gardens, watercourses and trees, which connect Mid Devon's settlements to the wider historic landscape.

1.24 There are currently 22 heritage assets in Mid Devon that are considered by English Heritage to be at risk of degradation for various reasons. The Heritage at Risk Register identifies three conservation areas (Bow, Cullompton and Tiverton), two buildings and 17 Scheduled Monuments at risk.

National Planning Policy

1.25 The National Planning Policy Framework (NPPF) was introduced in March 2012 and replaced multiple national policy statements and guidance with an overarching planning policy document. The NPPF requires local planning authorities to base local plans on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Assessments of and strategies for housing, employment and other uses should be integrated, taking full account of relevant market and economic signals.

1.26 Most importantly, the NPPF applies a 'presumption in favour of sustainable development'. For plan-making this means:

Local planning authorities should positively seek opportunities to meet the development needs of their area

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
- specific policies in the NPPF indicate development should be restricted (for example, restrictions on development affecting Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty, designated heritage assets or areas at risk of flooding).

1.27 The NPPF goes on to provide national policy on all areas of planning for development, such as design, transport, employment growth and the conservation of environmental and heritage assets. Before it can be adopted, a Local Plan must be subject to Examination in Public. The Planning Inspector applies tests of 'soundness', one of which refers to the plan's consistency with national policy. In addition, a Local Plan must be positively prepared, justified and effective, and the NPPF defines the meaning of these terms.

1.28 There is no longer a regional tier of planning policy in the form of a Regional Spatial Strategy. However, the Heart of the South West Local Economic Partnership (HotSW) is in the process of preparing a strategic plan which will have a bearing on strategic planning in Mid Devon.

Sustainability Appraisal

1.29 EU law requires public authorities to assess the impact on the environment when producing a plan or policies. UK regulations require that in addition to assessing the impact on the environment, local planning authorities should also consider the social and economic impact of a plan. Considering these three key elements together is central to assessing the sustainability of a plan.

1.30 A 'scoping stage' Sustainability Appraisal has been carried out during the preparation of this consultation document, in order to gain an understanding of the sustainability challenges the district faces, and the context in which the plan will be written. The initial Sustainability Appraisal lists the plans and programmes that operate at European, national, regional and local level. It also discusses the characteristics of Mid Devon and then identifies the key sustainability issues facing the district, which need to be considered during the preparation of policies. These issues have been highlighted as:

- Small areas of social deprivation within Tiverton, Cullompton and some of the remote rural areas (including high levels of child poverty)
- Large population growth within the last decade and demographic household change leading to the need for new housing, particularly affordable housing given the high ratio between prices and local earnings
- Houses have not previously been constructed of a sufficient size to meet the needs of the modern family
- Access to services and facilities for rural communities has worsened and may continue to do so
- Biodiversity levels continuing to fall, often dramatically for some species
- Low levels of the best quality grade 1 agricultural land across the district
- Pressure to develop primarily on greenfield sites as fewer brownfield sites remain or require costly remediation
- The need to avoid disposal of waste, instead prioritising re-use, recycling or reduction
- Rich historic environment across the district, though some a number of heritage assets at risk
- Climate change objectives can conflict with the conservation of the area's historic environment, particularly in the installation of renewables technologies that may impact on heritage assets

- Pressure for the installation of renewable energy developments to meet energy shortage
- Increased risk of flooding as a result of climate change
- Low delivery of low or zero carbon homes to date
- High car dependency across the district, with levels of car ownership having grown and continuing to grow
- Traffic congestion and poor air quality within Crediton and Cullompton
- Low levels of inward commuting but strong out-commuting, especially to Exeter and the potential loss of employment within Mid Devon
- Low retention of high-attaining school leavers
- Rural self-employment or small business start-up is a growing sector, however this may be constrained by poor broadband speeds
- Declining town centre health with town centre with regeneration likely to be affected by new out-of-centre development

A vision for Mid Devon

1.31 The Core Strategy adopted in 2007 set out a vision which remains relevant today, though it should be updated to reflect current national planning policy and the conclusions of the Sustainability Appraisal. The Local Plan Review involves a reconsideration of overall development strategy, including the distribution of development around the district and the relative status of the various towns and villages. However, it is unlikely that there will be significant change to the main principles of the Core Strategy vision as set out below.

VISION

Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services and a clean, green, safe environment. Local communities and private, public and voluntary organisations will work in partnership to meet social and economic needs in ways that enhance the environment and reduce the area's carbon footprint. High quality development in the right places will bring regeneration, social and economic benefits and enhance towns, villages and countryside while promoting sustainable use of energy and other resources and tackling the causes and effects of climate change. The Council will use planning and related powers to:

Promote community well-being:	Diverse, inclusive communities with a vibrant mix of accessible uses and local services Sufficient decent homes which people can afford Safe, healthy and crime free neighbourhoods Active, involved, well educated citizens
Support sustainable economic success	A good range of jobs in urban and rural areas Profitable and expanding local businesses Attractive, lively and successful town centres Tourist expenditure which benefits the whole district
Conserve and enhance the area	High quality design in new developments Clean air and water Wildlife, heritage and history is valued and protected Attractive countryside providing for biodiversity and employment
Respect environmental limits	Social and environmental benefits of development are optimised Developments use land, energy and resources efficiently Waste is minimised and recycling rates are high Public transport, walking and cycling are encouraged Floodplains remain undeveloped

Neighbourhood planning

1.32 The Localism Act 2011 devolved planning powers to local communities. A town or parish council designated as a neighbourhood forum can produce a neighbourhood plan, neighbourhood development order or community right to build order. The Campaign to Protect Rural England (CPRE) has produced a guide for communities interested in using this power, available online at <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/2689-how-to-shape-where-you-live-a-guide-to-neighbourhood-planning>.

1.33 A neighbourhood plan must be consistent with the strategic planning policies of the district council, national planning policy and human rights legislation. A Sustainability Appraisal and Strategic Environmental Assessment may also be required. The plan is then subject to independent examination and a referendum. If it succeeds at referendum, a neighbourhood plan would become part of the Mid Devon Development Plan and a statutory consideration in planning decisions.

1.34 Depending on its scope, the preparation of a neighbourhood plan can be a complex and time-consuming process, requiring a certain amount of technical expertise. The Council will support local communities wishing to pursue neighbourhood planning, but also offers the opportunity for communities to put forward proposals through the Local Plan Review. If the aspirations of local communities can be met through the Local Plan Review, this could save considerable time and expense involved in preparing a neighbourhood plan. Although there have been a number of enquiries about preparing neighbourhood plans there are currently no published proposals for any in Mid Devon.

Strategic Matters

2.1 Local planning authorities are required to co-operate with neighbouring local authorities and organisations such as Natural England and the Environment Agency on strategic matters. A strategic matter is “sustainable development or use of land that has or would have a significant impact on at least two planning areas”, with particular regard to significant infrastructure. Co-operation requires constructive, active and ongoing engagement with the other bodies subject to the Duty to Co-operate. The Council has identified which parts of the Local Plan Review may have significant effects on other planning areas and has opened discussions with the relevant councils or organisations. These discussions are taking place alongside the consideration of policy options for the Local Plan Review and will influence the outcomes.

Amount and distribution of development

Existing policy

2.2 Tiverton is the largest town in Mid Devon, with a parish population of approximately 21,900. Naturally, previous local plans have allocated the most development in Tiverton. The adopted Core Strategy (2007) establishes a hierarchy of settlements where development will be focused. In descending order of settlement size, these are: Tiverton, Cullompton, Crediton and Bampton. 21 villages have also been defined as settlements suitable for very limited development, and beyond this, all land is considered ‘countryside’ where development is strictly controlled.

2.3 The Core Strategy sets targets for average annual amounts of housing, employment and retail development, as follows:

Development Focus

COR 12

Development will be concentrated at Tiverton, Cullompton and Crediton, with a limited role for Bampton, to a scale and mix appropriate to their individual employment opportunities, services, transport choices, infrastructure, strategic role and environmental capacity. Other settlements will have only very limited development that is required to meet local needs and promote rural regeneration. Development rates will be approximately as follows:

Location	Average Annual Dwellings (of which affordable) 2006 to 2026	Average Annual Sqm Employment 2006 to 2026	Total Sqm Retail Sales 2006 to 2016
Tiverton	145 (43)	6000	3900
Cullompton	95 (28)	4000	2650
Crediton	35 (10)	2000	3450
Bampton	10 (3)	400	
Elsewhere	55 (16)	2300	
MID DEVON	340 (100)	14700	10,000

Review

2.4 The three main towns have grown considerably over the last century. Residential development of the twentieth and twenty-first centuries accounts for approximately 50% of Tiverton's land area, 46% of Cullompton's and 71% of Crediton's. Since March 2006, 619 homes have been built in Tiverton, 515 in Cullompton and 310 in Crediton. On average since 2006 there have been 330 dwellings built per year across the district, which is slightly below the Core Strategy target of 340 dwellings, but overall Mid Devon has a good record of housing delivery.

2.5 As explained earlier the fundamental need for new housing results from a growing population, and the Government has made increasing the housing supply a priority. The amount and distribution of housing development in the Local Plan Review will be informed by the results of two technical assessments which are currently underway or in the process of being commissioned. The Strategic Housing Market Assessment (SHMA) identifies the level of housing need and demand across the Exeter Housing Market Area. This will underpin the targets for overall housing numbers and will be an important consideration in the number/size of sites allocated for development. The Strategic Housing Land Availability Assessment (SHLAA) identifies which sites are available for development, are broadly suitable and have a realistic prospect of being developed. Together, these studies tell the Council how much land is potentially available for housing and how many homes need to be provided over a 15-20 year period.

2.6 The Core Strategy established a very limited role for the villages in meeting development needs across Mid Devon. The Local Plan Review will reassess the criteria for defining settlements as places suitable for limited growth, and consider the potential effects of a strategy that allows for greater growth outside of Tiverton, Cullompton, Crediton and Bampton. The role of Bampton will also be reviewed, to consider whether a development strategy for the town should be consistent with the larger villages rather than the three main towns.

2.7 National policy suggests that new homes can sometimes be best achieved through planning for larger-scale development, such as new settlements or extensions to existing villages and towns that follow the principles of 'Garden Cities'. Garden cities are self-sufficient communities surrounded by open countryside, designed to be satellites of existing cities or towns, with good transport links between. There are currently two urban extensions allocated in Tiverton and Cullompton, each requiring a Masterplanning exercise to be carried out before planning applications are considered. Both urban extensions are 'mixed use', including employment land, community facilities and significant areas of open space as well as housing. The Local Plan Review will reassess the broad strategy for development, including the principle of large-scale mixed use urban extensions as opposed to small-scale dispersed housing sites.

2.8 The Masterplanning of the Tiverton Eastern Urban Extension is already underway and the site is highly likely to be developed, but not at the housing numbers previously expected. If existing allocated sites are not delivering their intended amount of housing, it may be necessary to identify additional sites to achieve the housing requirement to 2026, and certainly to meet the period of the Local Plan Review, which is expected to run to 2031. Also, if the new Strategic Housing Market Assessment recommends a higher average annual housing target than the 340 dwellings in the Core Strategy, the Local Plan Review will need to allocate sufficient sites to meet this requirement.

2.9 Employment development has averaged 4,848 square metres per year since 2006, which is significantly below the Core Strategy target of 14,700 square metres. There has been low take-up of allocated employment sites, so the Local Plan Review must consider the reasons for this. For instance, how much is due to a poor economic climate, have the right sites been allocated, and what is the demand for employment space in Mid Devon? An Employment Land Review has been carried out and is discussed further in the Employment section.

2.10 Retail development has averaged 2500 square metres per year since 2006, and has already exceeded the Core Strategy target of 10,000 square metres by 2016, predominantly due to Tesco developments in Crediton and Cullompton. A new Retail Study was carried out in 2012 to determine the current performance of Mid Devon's town centres and the capacity for retail development. The Retail Study is discussed further in the Retail section.

Options

2.11 The Council recently asked its Citizens' Panel for views on options similar to those below. There was a clear preference for Option 1 and very little support for Option 3. The full results of the Citizens' Panel questionnaire will be published on the website with the results of this consultation.

2.12 Until the new Strategic Housing Market Assessment (SHMA) is completed, the amount of housing required in Mid Devon for the next 15-20 years is unknown. Up-to-date assessments of employment and retail need have already been carried out and will have a bearing on which of the options below is found to be appropriate. For instance, the retail strategy for Crediton was aimed at 'clawing back' some of the expenditure that was being lost to Exeter. Since that strategy was adopted, the Crediton Tesco has been built and the updated Retail Study finds that the problem of lost expenditure has been addressed, so the proportion of retail growth shown under Option 1 is no longer necessary.

Option 1

Retain the current strategy, directing development towards the largest settlements that have existing shops, services and facilities, according to the following proportions:

Location	Residential	Employment	Retail
Tiverton	43%	41%	39%
Cullompton	28%	27%	27%
Crediton	10%	14%	35%
Bampton	3%	3%	0%
Elsewhere	16%	16%	0%

Option 2

Disperse development more widely, increasing the number of villages with settlement limits, allowing the larger villages to expand and reducing the pressure on the three main towns to meet the majority of the district's development needs.

Option 3

A new settlement or significant expansion of an existing village to meet the district's entire development need (except for small sites to meet specific local needs such as affordable housing).

Housing

Existing policy

2.13 Adopted Core Strategy (Local Plan Part 1) Policy COR12 is shown at paragraph 2.3 and sets an average target of 340 dwellings built in Mid Devon each year. 100 of the 340 dwellings should be affordable. Affordable housing includes 'social rented', 'affordable rented' and 'intermediate' housing, all of which provide housing at a lower cost than the equivalent market housing. The full definition is set out in the National Planning Policy Framework. Core Strategy policies for Tiverton, Cullompton, Crediton and Bampton break down the local housing requirement further, setting individual targets for affordable housing and other development. Policy COR3 attempts to phase overall housing delivery as shown on page 20. The Core Strategy also sets a range of expected housing densities which varies according to location.

The diverse housing needs of the community will be met through the provision of approximately 6800 dwellings between 1st April 2006 and 31st March 2026, including a target of 30% (2000) affordable dwellings and an appropriate mix of dwelling sizes and types. In line with strategic requirements for a long term reduction in the annual rate of new housing development, these will be phased as follows:

- a) 390 dwellings, including 100 affordable dwellings, per year between 2006 – 2016;**
- b) 290 dwellings, including 100 affordable dwellings, per year between 2016 – 2026.**

2.14 The Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) provides additional housing policies relating to affordable housing, gypsy and traveller accommodation and socially inclusive design.

2.15 AIDPD Policy AL/DE/3 sets a threshold for and proportion of affordable housing to be provided within housing development. An affordable housing requirement applies to any open market development proposal of more than four dwellings in Tiverton, Cullompton, Crediton and Bampton, and more than two dwellings elsewhere. A target of 35% affordable housing is applied to the number of dwellings by which sites exceed the threshold.

2.16 Policy AL/DE/6 allows affordable housing in rural locations not normally considered suitable for housing. This 'exception site' policy has been amended in the Local Plan Part 3: Development Management Policies (LP3) to allow for a modest proportion of open market housing if it ensures the delivery of significant affordable housing. The review of policies for exception sites and gypsy and traveller accommodation are discussed under Managing Development, later in this document.

2.17 In 2012 the Council reviewed its Supplementary Planning Document, 'Meeting Housing Needs'. This provides development guidance on a range of housing matters such as mix and tenure, local connection criteria for affordable housing residents and a method for calculating a financial contribution towards affordable housing in lieu of building the houses on-site.

Review

2.18 Recent years have seen considerable housing development in the three main towns (see paragraph 2.4) as well as elsewhere, though on average this still falls slightly below the average annual target of 340 dwellings set out in the Core Strategy. Housing completions between April 2009 and March 2012 were particularly low, as might be expected in a poor economic climate, but Mid Devon has a good longer-term record of housing delivery and there are signs that building rates are improving once again. There were 50% more dwellings built in 2012-13 than the previous year.

2.19 The fundamental need for housing is demonstrated in the introduction (paragraphs 1.8-1.14). Affordability remains a critical issue, and with the Mid Devon population having risen 11% between 2001 and 2011, the Core Strategy housing target may not have been set high enough to meet housing demand. However, there are many available and achievable housing sites in Mid Devon that are yet to be developed. Their failure to come forward is likely the result of a poor economic climate and difficulties in obtaining development finance, rather than an issue of land availability. The Council is required to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against the housing requirement set by policy. In Mid Devon, the last annual update to this figure showed the 'five year supply' standing at 136% of the Core Strategy requirement.

2.20 The significant risk faced by any local planning authority is that an insufficient housing land supply will result in 'planning by appeal'. This can happen when the Local Plan is out-of-date and does not have enough remaining undeveloped allocated sites to meet identified needs. In these cases local authorities are vulnerable to speculative proposals in unsuitable locations. The Council may refuse the planning application but lose the appeal due to there being no alternative sites available. It is imperative that the Local Plan Review provide for sufficient housing to meet overall need and demand.

2.21 The Mid Devon Local Housing Needs and Demand Survey 2011 indicated a need for 335 additional affordable dwellings each year to address the backlog of unmet need over the last 10 years. This makes up almost the whole of the average annual housing target set by the Core Strategy, before any market housing is even considered. The new Strategic Housing Market Assessment (SHMA) will take this evidence into account and consider both existing and future housing need and demand, based on demographic trends. The SHMA will identify the needs of different groups in the community such as families, older people and those with disabilities. This will enable the Council to plan for the size, type, tenure and range of housing that is required in particular locations.

2.22 The SHMA will help to identify overall targets for affordable housing provision and the proportion of affordable units to be sought within market housing developments, but any target percentage must also be supported by evidence of development viability. The Council must assess the cumulative impacts of all standards and policy requirements, to understand the overall risks to successful implementation of the Local Plan. Development will not come forward unless the landowner and developer stand to make a profit, but development must also invest in community infrastructure such as affordable housing, education and road improvements. This is discussed further in the Infrastructure section.

2.23 Whatever housing targets are taken forward, careful consideration must be given to the amount of land that will be given over to development. Higher density developments make efficient use of land and require smaller site allocations, but the character of the development may then be at odds with older, lower density development in the surrounding area. There is a potential friction between two objectives: minimising the loss of greenfield land with ecological, agricultural and landscape value, and creating high quality places that respect the character and appearance of the existing town or village. National policy allows local authorities to set local standards on housing density. Density (the number of dwellings per hectare) might be expected to be higher in town centres, and lower in suburban or village locations, and it may or may not be appropriate to set minimum density requirements.

2.24 Options for the overall distribution of development are set out under paragraph 2.12. Specific sites are considered later in this document. The options below refer only to potential policies on affordable housing and the density of development. The outcomes of the SHMA and subsequent viability evidence will influence targets and requirements. Option 1, to maintain current policies, will only be favoured by the Council if justified by the evidence.

Options

Option 1

Retain current policies, as follows:

- Target 100 affordable dwellings per year
- 35% affordable housing required on eligible sites
- Thresholds – affordable housing required for sites over 4 dwellings in the towns and over 2 dwellings elsewhere
- Housing density: dwellings per hectare – 50-75 in town centres, 35-55 elsewhere in towns, and 30-40 in villages

Option 2

Revise policies according to up-to-date and relevant evidence about matters such as housing need, demand and viability.

Employment

Existing policy

2.25 The adopted Core Strategy sets strategic targets for employment growth of approximately 300,000 square metres floorspace over the period 2006-2026. This translates to an annual target of 14,700 square metres, mostly distributed in the three main towns. 'Employment' in the policy is taken to mean development within use classes B1 (offices and light industry), B2 (general industry) and B8 (storage and distribution). Core Strategy Policy COR4 is shown below.

Meeting Employment Needs

COR 4

The employment needs of the community will be met through

- a) the development of approximately 300,000 square metres of employment (B1 – B8) floorspace;**
- b) the development of approximately 10,000 square metres of retail (A1) sales floorspace (2006 – 2016);**
- c) measures to diversify the agricultural and rural economy in ways which protect countryside character**
- d) other forms of sustainable employment generating uses.**

2.26 The Core Strategy attempts to address a long-standing situation whereby a high proportion of Mid Devon residents commute to work outside the district. Employment floorspace targets and land allocations seek to redress this balance by creating a 1:1 ratio of jobs to working population. Nationally there is now significant focus on economic development to assist with recovery from the current recession.

Review

2.27 The Core Strategy's aspiration for employment growth has not been matched by demand for development. Employment development has averaged 4,848 square metres per year since 2006, which is significantly below the Core Strategy target of 14,700 square metres. There has been low take-up of allocated employment sites, so the Local Plan Review must consider the reasons for this. For instance, how much is due to a poor economic climate, have the right sites been allocated, and what is the demand for employment space in Mid Devon?

2.28 The reasons behind the existing employment strategy remain valid. There are low levels of inward commuting and a strong 'pull' from neighbouring urban areas, especially Exeter. Forthcoming data release from the 2011 Census will provide up-to-date information about travel-to-work patterns. The available information from the Annual Population Survey (2008) estimates that of the people working in Mid Devon, only 25% commute in from outside the district, while only 57% of Mid Devon's working residents stay in Mid Devon for work.

2.29 The Core Strategy aspired to improve the self-sufficiency of Mid Devon, creating a more sustainable economy which meets the needs of local communities while reducing the need to travel elsewhere for employment, and therefore the level of commuting traffic generated. This was also a guiding principle in the allocation of employment sites in the towns, allowing jobs to be accessed by walking, cycling or public transport.

2.30 However, allocating land does not on its own make Mid Devon an attractive location for businesses looking to start-up, expand or relocate. An Employment Land Review was published in 2013, concluding that the market is unlikely to support the delivery of all the current employment land allocations. The study's forecasts indicate a demand for employment land of 28-51 hectares over the period to 2031, recommending overall that the Local Plan Review plan for between 30 and 40 hectares. This would provide up to 200,000 square metres of employment floorspace, a third less than the adopted Core Strategy target. It also indicates that the current concentration on larger sites should be reconsidered with potentially more small, easily developed sites being allocated.

2.31 The Local Plan Review will consider which sites have been allocated and whether these remain the best, most sustainable options. The Employment Land Review considers the allocated sites and also a number of other possibilities, including Junction 27 of the M5 motorway. The report advises that Junction 27 would not be commercially attractive or suitable for significant office development (B1 use class), but there is likely to be a growing demand for distribution space within the region, particularly for larger units with motorway access. However, there does not appear to be an immediate, short-term shortage of suitable employment land for these uses in the Taunton-Exeter corridor. There are a number of competing sites and locations that would be commercially attractive and also relate strongly to existing urban centres, providing a nearby workforce and skills base with good accessibility from the M5. Those alternative locations provide stronger opportunities for sustainable travel. The Employment Land Review also advises that the provision of additional employment floorspace targeting industrial and distribution occupiers at Junction 27 could well result in the displacement of demand from existing allocated sites at Cullompton and Willand. If a land allocation for Junction 27 is pursued, this may require the removal of employment allocations at Cullompton. The Local Plan Review must consider the relative merits of the various sites, bearing in mind that the overall amount of land allocated for employment is likely to be reduced.

2.32 The Council recently asked its Citizens Panel to comment on different approaches to planning for employment. Responses indicated most support for the improvement and redevelopment of town centres and encouragement of development that creates jobs. The allocation of large sites for employment was not preferred. The full results of the Citizens Panel survey will be published on the Councils' website with the results of this consultation.

Options

Option 1

Retain the current strategy that seeks a 1:1 relationship between jobs and population, allowing for population growth.

Option 2

Follow the recommendations of the Employment Land Review, reducing the overall target for employment growth within use classes B1, B2 and B8 whilst encouraging the development of smaller sites.

Retail

Existing policy

2.33 The Core Strategy (Local Plan Part 1) set a target of 10,000 square metres of retail floorspace to be provided between 2006 and 2016. Policy COR12 breaks this down among the three largest towns.

2.34 By the time the Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) was adopted in 2010, the Core Strategy target had already been met. There was no strategic need for further retail development, so the AIDPD only allocates small sites to meet local needs or aspirations. These are discussed under Land Allocations, later in the document.

2.35 The Local Plan Part 3: Development Management Policies (LP3) includes policies based on the content of the National Planning Policy Framework, to manage change within town centres and ensure that town centre sites are given preference to out-of-centre locations. These policies are discussed under Managing Development.

Review

2.36 Retail growth across Mid Devon has exceeded the Core Strategy target and the Local Plan Review must now consider the future demand for retail development. The Council commissioned a Retail Study in 2012, to assess both demand and the capacity of the local catchment areas to support different sorts of retail growth.

2.37 Mid Devon's market towns are in a vulnerable position, similar to many other small-medium sized towns around the country. The Retail Study identifies common trends, such as national retailers consolidating their businesses in larger regional centres, while internet shopping also takes trade away from town centre shops. In the smaller towns, weak retail demand, shorter leases and the threat from online sales will continue to threaten development viability. The following table shows how Mid Devon's towns compare to others in the sub-region. The figures relate to a national ranking of retail centres. The VenueScore database ranks towns based on information about retailers in place and available floorspace to enable a comparison to be drawn between the performances of different centres over time. The relative rankings of some Devon and Somerset town centres are shown below.

Centre	2011 ranking
Exeter	27
Taunton	80
Yeovil	169
Barnstaple	196
Bridgwater	331
Tiverton	422
Wellington	1128
Honiton	1216
Crediton	1650
Cullompton	2142

2.38 Retail forecasts predict weak expenditure growth, possible reductions in town centre retail space and greater polarisation between centres. There will be a greater concentration of expenditure supporting existing retail floorspace, there being less money to go around. The Retail Study predicts that these effects will be particularly acute in Crediton and Cullompton, both of which have modestly performing non-food sectors which could be hit hard by a slowdown in expenditure growth. Mid Devon retailers may need to change their retail offer to minimise competition with online retailers and serve a more local walk-in customer base, and specialist retailers may move away from town centres if they are gaining a larger proportion of their trade from online sales.

2.39 The Retail Study provides a number of options for town centres. National policy maintains a strong 'town centre first' approach which discourages out-of-centre development, but the Retail Study recognises that out-of-centre locations will have more attractive land values and available space to meet current retailer requirements. The potential for retail development outside a town centre to harm the existing town centre is of primary concern. Town centre regeneration could focus on maximising the value of heritage and leisure facilities, to provide a more enjoyable shopping experience.

2.40 The Retail Study identifies some capacity for non-food retail growth in Tiverton but advises that the Council's efforts in Cullompton, Crediton and Bampton should focus on maintaining and enhancing the existing stock of retail floorspace. Detailed recommendations specific to the towns are discussed in the Land Allocations section, later in this document.

Options

Option 1

Continue with a similar policy approach to the one previously adopted, which:

- Protects and enhances town centres, applying a sequential approach that directs development to the town centre first, in accordance with national policy
- Provides for some retail growth in Tiverton in line with the Retail Study's recommendations

Infrastructure

Existing policy

2.41 The adopted Core Strategy (Local Plan Part 1) includes the policy on infrastructure provision set out below:

Infrastructure Provision

COR 8

The location, scale and form of development will be guided by the need for community facilities and any existing shortages. The Council will work with providers and developers to ensure that new development is served by necessary infrastructure in a predictable, timely and effective fashion. It will set out key infrastructure and facility requirements for new development, taking account of existing provision and cumulative impact. Developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and facilities where it is appropriate for them to do so.

2.42 The Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) builds upon this by setting out more detailed policies on public open space, education provision, carbon reduction and strategic roads. It also allocates the Tiverton and Cullompton urban extensions, each required to provide a primary school, transport infrastructure, community facilities and significant areas of open space. At the same time the Council prepared an Infrastructure Plan in support of a Community Infrastructure Levy (CIL) charging schedule.

2.43 The Council has adopted a charging schedule for CIL, which is expected to be put in place from 1 October 2013. CIL will be charged at £40 per square metre on all open market housing developments. This will replace the use of planning obligations (Section 106 Agreements) to secure generic contributions towards air quality improvements and public open space. CIL revenue will contribute towards essential infrastructure projects such as the Eastern Relief Road in Cullompton. At least 15% of CIL receipts from a development will be transferred to the relevant town or parish council to spend on local infrastructure.

Review

2.44 As part of the Local Plan Review, the Council will assess the infrastructure needs associated with the level of development being proposed. This will require active engagement with other organisations such as Devon County Council as the local highway and education authority.

2.45 Infrastructure delivery must be provided in step with development, though in most cases it is not possible for development to fund significant infrastructure until some cashflow has been generated through sales. CIL is not intended to fund all necessary infrastructure in the district, but to make a contribution. The Council must identify alternative sources of finance that will help to close the funding gap. Mid Devon's CIL rate has been subject to independent examination and is considered viable overall, so in most cases it should not prevent development from coming forward.

2.46 In reviewing strategic policies and land allocations, the Council will carry out new viability assessment of all proposed targets and standards. This will be the basis of a revised charging schedule for CIL. A joint examination of the Local Plan and CIL is anticipated in February 2015.

2.47 The road infrastructure identified in the AIDPD is intended to relieve traffic congestion, improve the air quality in town centres and provide capacity for future development. The Tiverton Eastern Urban Extension will require a new access onto the A361 and suitable access to Heathcoat Way. Devon County Council is seeking public funding to help deliver this infrastructure. Works on the Crediton Link Road have already started, while the Eastern Relief Road in Cullompton is required to support the level of development already allocated in Cullompton, though Masterplanning of the North West Cullompton Urban Extension has not yet commenced. Development is expected to contribute to the funding of the road, the precise route for which has not yet been determined. The Local Plan Review will reassess the amount and distribution of future development in Cullompton, including a review of the available options for road infrastructure. The review will also enable a review of the content of the Infrastructure Plan to support a review of the CIL charging schedule.

Options

2.48 When questioned recently about priorities for infrastructure delivery, the Mid Devon Citizens Panel expressed an overall preference for the delivery of new public open space and green infrastructure. There was also a clear desire for investment in schools and roads.

2.49 The options on page 30 should be considered alongside the options in the Amount and Distribution of Development section. Large mixed use developments can provide a range of benefits including accessibility to jobs, services and open space, but there are often complications over different land ownership, development viability and phasing of infrastructure delivery. The benefit of Option 2 may be that sites are more straightforward to develop and come forward more quickly, but at the expense of embedding essential infrastructure such as schools and community facilities within new housing development. The danger is that if a new school is not provided within a large development, it may not be provided anywhere. CIL funds might then be put towards maintenance or improvement of existing facilities and not towards an entire new school or community hall.

Option 1

Urban extensions incorporate specific items of infrastructure such as schools, community facilities and open space, while 'offsite' infrastructure (e.g. a relief road) is funded by all development liable to pay the Community Infrastructure Levy.

Option 2

A greater number of smaller development allocations require minimal infrastructure within the site. The Community Infrastructure Levy is spent on all types of infrastructure in the local area.

Environment

Existing policy

2.50 There are existing Local Plan policies on a range of environmental topics, such as climate change, renewable energy, heritage, biodiversity, flooding and landscape. Broadly speaking, they seek to preserve and enhance environmental assets, minimising the potentially harmful effects of development. Most of the latest policies relating to the environment are discussed in the Managing Development section. The overarching environmental policy is in the Core Strategy (Local Plan Part 1).

Local Distinctiveness

COR 2

Development will sustain the distinctive quality, character and diversity of Mid Devon's environmental assets through:

- a) **high quality sustainable design which reinforces the character and legibility of Mid Devon's built environment and creates attractive places,**
- b) **the efficient use and conservation of natural resources of land, water and energy,**
- c) **the preservation and enhancement of the distinctive qualities of Mid Devon's natural landscape, supporting opportunities identified within landscape character areas. Within the Blackdown Hills Area of Outstanding Natural Beauty or adjoining the Area of Outstanding Natural Beauty or Exmoor and Dartmoor National Parks, the primary objective will be to protect the special environmental qualities of that landscape and its setting,**
- d) **the protection and enhancement of designated sites of national and local biodiversity and geodiversity importance. Development will support opportunities for protecting and enhancing species populations and the restoration, re-creation, enhancement and linking of habitats to contribute toward the delivery of Biodiversity Action Plan targets, and**
- e) **the preservation and enhancement of Mid Devon's cultural and historic environment, and the protection of sites, buildings, areas and features of recognised national and local importance.**

Review

2.51 The recent State of Nature report (2013) is the result of collaborative working between 25 UK wildlife organisations. The report finds that, of the 3148 species assessed, 60% have declined in the last 50 years and 31% have been in severe decline. One in 10 UK species are thought to be under threat of extinction. Climate change is having an increasing impact on nature, with rising average temperatures causing some species to expand their range while others cannot adapt.

2.52 A rising population and expanding settlements increase the pressure on finite natural resources. The Council has a legal duty to conserve biodiversity in the exercise of its various functions. National planning policy directs local authorities to encourage the efficient use of previously developed (brownfield) land, and seek to use areas of poorer quality agricultural land in preference to that of a higher quality. Policies should set criteria against which proposals for development affecting wildlife/geodiversity sites or landscape areas will be judged, proportionate to their importance. Local planning authorities should plan positively for the creation, protection and enhancement of biodiversity.

2.53 National policy sets out the approach the Council should take to environmental protection and enhancement, from biodiversity to heritage, renewable energy, carbon reduction, flooding and landscape. This does not detract from the primary purpose of the planning system to help achieve sustainable development. The Review will also establish a strategy for renewable energy development, perhaps identifying broad locations considered suitable for renewable energy development. This will be informed by the results of a Landscape Sensitivity Study which is currently being produced, and there are no specific options being considered at this point.

2.54 The Council recently questioned its Citizens Panel about priorities for environmental protection and enhancement. There was a clear priority expressed for preventing development in flood plains, though all environmental concerns were shown to be locally important. The full results of the questionnaire will be published on the website shortly.

Options

2.55 Detailed topic-based policies are listed under Managing Development, later in this document. Environmental implications for specific sites will be considered as the Local Plan Review progresses and sites are being assessed. Options for an overarching strategic policy are set out below.

Option 1

Retain a strategic policy similar to the existing Policy COR2, adapted as necessary to take account of any changes in national policy.

Option 2

Replace the policy with a broader environmental strategy that sets out the principles underpinning more detailed policies on subjects such as landscape protection, flood prevention and heritage assets.

Land Allocations

Tiverton

Existing policy

3.1 As the largest town in Mid Devon, existing policies direct the largest proportion of development towards Tiverton. The Core Strategy (Local Plan Part 1) has a target of 145 dwellings, 6,000 square metres employment and 3,900 square metres retail floorspace built in Tiverton per year. District-wide housing completions dropped significantly between 2009 and 2011, and the average for Tiverton since 2006 is only 88 dwellings per year.

3.2 The primary land allocation is the Tiverton Eastern Urban Extension, which provides for 1550-2000 homes and up to 130,000 square metres employment floorspace. Masterplanning of the urban extension is now underway, with an initial consultation held throughout May 2013. A second stage of consultation on a draft masterplan is expected shortly. Once a masterplan is finalised, there will be additional consultation on any planning applications that are registered.

3.3 Other allocations in Tiverton include:

- Farleigh Meadows (300 dwellings)
- Blundell's School (200 dwellings and 7000 square metres employment floorspace)
- Howden Court (65 dwellings)
- Belmont Hospital (76 dwellings)
- St Andrew Street/Town Hall (55 dwellings)
- Former district hospital/William Street (45 dwellings)
- Palmerston Park (15 affordable dwellings)
- Blundell's Garage/Ford House (13 dwellings)
- Roundhill (13 affordable dwellings)
- Hay Park, Canal Hill (13 dwellings)
- The Avenue (15 dwellings)
- Phoenix Lane (2400 square metres mixed retail, office and/or leisure floorspace)
- Bampton Street (900 square metres retail)
- Tidcombe Hall contingency site (200 dwellings if other development not forthcoming)

Review

3.4 Several of the existing allocated sites are already developed or at application stage. The planning application for Farleigh Meadows has been approved subject to a legal agreement. The redevelopment of the land behind the Town Hall has planning permission. Part of the Howden Court site is under construction or complete. Both former hospital sites are currently under construction and the development adjoining Ford House has been completed. The remaining allocated sites other than the urban extension are mainly small-scale and will not meet the long-term strategic housing need going forward to 2031.

3.5 Early information shows that the Eastern Urban Extension is unlikely to deliver the amount of development set out in the policy. Various site constraints such as elevated land, surface water flooding and ecological protection result in a likely reduction to about 1250-1500 homes and about 40,000 square metres employment floorspace. The reduced employment floorspace is also supported by the Employment Land Review (2013), which recommends a lower overall employment target to reflect market demand.

3.6 While the results of the new Strategic Housing Market Assessment (SHMA) are not yet known, the housing need and demand to 2031 is likely to exceed current Local Plan provision. The Local Plan Review will reassess the availability, suitability and achievability of remaining undeveloped allocated sites, but it is likely that additional land must also be identified to accommodate the forecast population up to 2031. The difficulty will be in finding sites that are not in the floodplain or on steeply sloping ground.

Options

3.7 The following options should be considered alongside those in the earlier section on the amount and distribution of development. For instance, if a new settlement or significant expansion of an existing village is the preferred option, there may be no need to further expand Tiverton beyond the level of development already allocated. For the purposes of this section, it is assumed that Tiverton will continue to accommodate a large proportion of the district's development. The following options also assume that there will be a need to allocate housing land in excess of the sites already allocated, but this will be influenced by the findings of the SHMA. Which sites are chosen will also depend on an assessment of land availability, suitability and achievability.

Option 1

Continue with current strategy – expand Tiverton to the east and allocate a number of smaller sites around the town. To accommodate additional housing need, this could involve further extension to the east, or a higher number of smaller sites around the town.

Option 2

Identify new locations for long-term strategic growth in Tiverton, other than further expansion to the east.

Cullompton

Existing policy

3.8 The Core Strategy (Local Plan Part 1) was adopted in 2007 and sets a target of 95 dwellings, 4,000 square metres employment and 2,650 square metres retail floorspace per year in Cullompton. District-wide housing completions dropped significantly between 2009 and 2011, and the average for Cullompton since 2006 is only 74 dwellings per year. However, there were 158 dwellings built in 2012-13, well above target and significantly higher than the amount of housing development in Tiverton over the same year.

3.9 Most of Cullompton's recent development is the culmination of site allocations that were adopted in the 2006 Local Plan. The Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) allocates further sites to meet forecast housing need up to 2026. The main site is the North West Cullompton Urban Extension, comprising 1100 homes and 40,000 square metres employment floorspace.

3.10 Other allocations in Cullompton include:

- Knowle Lane (340 dwellings)
- Court Farm (150 dwellings)
- Padbrook Park (30 dwellings)
- Exeter Road (45 dwellings)
- Lower Bull Ring (0.3 hectare site for community facilities)
- Week Farm (15,000 square metres employment floorspace)
- Eastern Relief Road (linking Station Road to Meadow Lane)
- Cullompton Air Quality (developer contributions to Eastern Relief Road)
- M5 Junction 28 (developer contributions to improvement)
- Town Centre Enhancement (developer contributions)
- Enhanced Walking and Cycling Route (enhanced access between eastern Cullompton and destinations in the south of the town)
- Railway Station Car Park (protection of land in case the railway station is re-opened)
- Colebrook contingency site (100 dwellings if other development not forthcoming)

Review

3.11 Allocations at Padbrook Park and Court Farm have planning permission with some dwellings under construction, though permissions are not for the entire number of homes allocated. Under current plans, the long-term growth of Cullompton would occur through the urban extension and the Eastern Relief Road. The urban extension would include a road linking Tiverton Road to Willand Road. In combination with the Eastern Relief Road, this would alleviate traffic congestion in the town centre, improving local air quality and the shopping experience for pedestrians. The Employment Land Review (2013) recommends that the employment element of the urban extension be reduced from 40,000 to about 10,000 square metres of employment floorspace.

3.12 No Masterplanning of the urban extension has yet commenced and there are no proposals for the site to be brought forward in the near future, though some landowners have recently confirmed that the site is still available for development. The route of the Eastern Relief Road through the Cullompton Community Association (CCA) fields is still highly contentious but no suitable alternative has been identified. The Local Plan Review must reconsider all available options and allocate sites in Cullompton that are likely to be delivered, while minimising environmental impacts.

3.13 The further growth of Cullompton is also constrained by the need for improvements to the motorway junction. Recent development has already funded some improvements and further contributions are required before significant further development in Cullompton can be permitted.

3.14 Without the urban extension, there are insufficient sites in Cullompton to meet long-term housing need and demand, though the new Strategic Housing Market Assessment (SHMA) will advise the Council on exactly what level of future need is expected. It is likely that additional or larger sites will need to be identified to meet housing needs to the year 2031. Traffic congestion in the town centre is a significant, ongoing problem which can only be alleviated through the distribution of traffic on alternative or improved routes, and this must be at least partially funded by development. The Local Plan Review will consider which options would deliver the most public benefit overall, understanding that public interests and opinions will vary.

3.15 The traffic situation in Cullompton would also be improved by the re-opening of the Cullompton railway station. Devon County Council's Local Transport Plan introduces the Devon Metro scheme, a programme of new and reinstated railway stations to improve access to jobs and tourism across Devon and Torbay. A station at Cullompton is being considered as a longer-term option from 2021-2026, estimated to cost £4 – 5.9 million.

Options

3.16 The following options should be considered alongside those in the earlier sections on the amount and distribution of development, and infrastructure. For instance, if a new settlement or significant expansion of an existing village is the preferred option, there may be no need to further expand Cullompton. However, as explained above, there is a need to alleviate traffic congestion in Cullompton and without further development the feasibility of constructing a relief road is unlikely. For the purposes of this section, it is assumed that Cullompton will continue to accommodate a significant proportion of the district's development. The following options also assume that there will be a need to allocate housing land in excess of the sites already allocated, to meet demand up to the year 2031, but this will be influenced by the findings of the SHMA. Which sites are chosen will also depend on an assessment of land availability, suitability and achievability.

Option 1

Retain current strategy – North West Cullompton Urban Extension as the primary site allocation and the Eastern Relief Road to pass through the CCA fields.

Option 2

Find an alternative growth option such as a different location for an urban extension, or multiple smaller sites around Cullompton, as long as highways infrastructure can be delivered.

Crediton

Existing policy

3.17 The Core Strategy (Local Plan Part 1) sets a target of 35 dwellings, 2,000 square metres employment and 3,450 square metres retail floorspace to be built per year in Crediton. District-wide housing completions dropped significantly between 2009 and 2011, but the average for Crediton since 2006 is 44 dwellings per year, about 26% above target.

3.18 Allocated sites in Crediton include:

- Wellparks (185 dwellings)
- Red Hill Cross (135 dwellings)
- Cromwells Meadow (50 dwellings)
- George Hill (25 dwellings)
- The Bike Shed (10 dwellings)
- The Woods Group (8 dwellings)
- Wellparks, A377 (4,150 square metres employment floorspace)
- Crediton Air Quality (developer contributions)
- Crediton Link Road (linking the A377 and Lords Meadow Industrial Estate)
- Exhibition Road (single site for college)
- Cemeteries (site at Old Tiverton Road)
- Pedlerspool contingency site (165 dwellings and 21,000 square metres employment floorspace if other development not forthcoming)

Review

3.19 There is less development allocated in Crediton than would meet Core Strategy targets, due to the physical constraints of the town's topography. The Red Hill Cross allocation now has planning permission. Progress is slower in the delivery of other sites, though the Wellparks housing allocation is expected to come forward. When the Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) was prepared, the under-provision of development allocations in Crediton was considered to be offset by over-provision elsewhere.

3.20 The Local Plan Review must now consider whether this strategy for Crediton is the right one. The Retail Study (2012) shows that the reason for the relatively high retail target in the Core Strategy no longer applies, now that the Tesco supermarket has been built. The Employment Land Review (2013) recommends the retention of existing employment allocations, suggesting that the level of employment provision is correct. With regard to housing, the new Strategic Housing Market Assessment (SHMA) will advise the Council of the long-term housing need and demand. In combination with an assessment of land availability, suitability and achievability, this will form the basis for any new proposals for site allocations.

3.21 Under current policy, the Pedlerspool contingency site should not be brought forward unless cumulative dwelling completions across the district since 2006 fall below defined 'action levels'. The action levels are far from being reached so at present no contingency sites are likely to be triggered, but the Council will reassess the location and status of contingency sites through the review process.

Options

Option 1

Continue with a strategy of under-provision in Crediton, due to the physical constraints of the town.

Option 2

Depending on up-to-date evidence of need, land availability, suitability and achievability, allocate sufficient land to meet development needs.

Bampton

Existing policy

3.22 The Core Strategy (Local Plan Part 1) groups Bampton with the three main towns, though its targets for development are considerably lower at only 10 dwellings and 400 square metres of employment floorspace per year. Since 2006 an average of 12 dwellings have been built per year, which, though above target, does reflect housing completions in the whole parish of Bampton and not just the town itself.

3.23 In line with the Core Strategy, the Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) allocates some market housing in Bampton, whereas in the villages only affordable housing and small-scale employment were considered. Even so, the employment allocation in Bampton is 2,232 square metres less than the Core Strategy target, due to suitable land not being available without reducing proposed housing numbers and development viability.

3.24 Allocated sites in Bampton include:

- School Close (60 dwellings)
- Bouchier Close (40 dwellings)
- Ashleigh Park (5 dwellings)
- Newton Square (5 dwellings)
- Scotts Quarry (retained site from 2006 Local Plan with an outstanding employment element)

Review

3.25 The School Close site has planning permission and is partially under construction, though permission is not for the full 60 dwellings allocated. There have been planning applications at Bouchier Close and Scotts Quarry, proving an ongoing interest in development even if planning permission has not been granted. A planning refusal for the Ashleigh Park site was overturned at appeal in April 2013.

3.26 Bampton has a recognisable town centre and a range of shops, facilities and services that exceed those of the larger villages, and for this reason a larger proportion of development was put forward in Bampton. However, there are significant local concerns about the suitability of the road network to support additional traffic, and a perceived lack of demand for employment development in Bampton. The Employment Land Review (2013) recommends that an employment allocation is retained to meet local demand and to support employment provision at Bampton, though the Local Plan Review will reassess the options for available and suitable sites. With a plan period extending to 2031, current economic conditions are not in themselves a reason to delete employment allocations, though the realistic prospects of delivery will still be taken into account.

3.27 The Local Plan Review will reassess the status of Bampton relative to the towns and villages as part of a wider review of development strategy. While the following options refer to Bampton specifically, they should also be considered alongside the options discussed earlier in this document regarding the amount and distribution of development, housing, employment and infrastructure. For instance, if Bampton is no longer classed among the towns (Option 2) but the overall development strategy relaxes restrictions on the expansion of villages, Bampton would still be subject to some development pressure.

Options

Option 1

Retain the strategy for Bampton as a town suitable for a moderate level of development, including both housing and employment development and a target of approximately 10 dwellings per year.

Option 2

Re-classify Bampton so its development status matches the designated villages in Mid Devon, where expansion may be more limited.

Villages

Existing policy

3.28 There are 21 villages identified in the Core Strategy (Local Plan Part 1) as being suitable for very limited development. These are:

- Bow
 - Bradninch
 - Burlescombe (including Westleigh)
 - Chawleigh
 - Cheriton Bishop
 - Cheriton Fitzpaine
 - Copplesstone
 - Culmstock
 - Halberton
 - Hemyock
 - Kentisbeare
- Lapford
 - Morchard Bishop
 - Newton St Cyres
 - Sampford Peverell
 - Sandford
 - Silverton
 - Thorverton
 - Uffculme
 - Willand
 - Yeoford

3.29 Core Strategy Policy COR17 allows for minor proposals and site allocations for affordable housing, employment and tourism, community facilities/services and other very limited development which meets a local need.

3.30 Since the Core Strategy was adopted, national policy has relaxed certain restrictions on rural development, and the Council will now consider proposals for 'cross-subsidy' of affordable housing. This means that sites that were only considered suitable for affordable housing might now include an element of market housing, if the site would not have come forward for development otherwise.

3.31 The defined villages have settlement limits, beyond which the countryside policy applies. Core Strategy Policy COR18 lists the sorts of development that are permissible in the countryside, such as replacement dwellings, agricultural buildings and renewable energy developments. The Local Plan Part 3: Development Management Policies (LP3) contains more detailed criteria-based policies for the consideration of such development.

Review

3.32 Although the Core Strategy sought to direct most development to the towns, where existing infrastructure such as schools and healthcare are easily accessible, the actual amount of development in the countryside has far exceeded the level expected in the Core Strategy. The Core Strategy assumed that approximately 55 dwellings would be built per year outside of the parishes of Tiverton, Cullompton, Crediton and Bampton. Since 2006 there have been 111 dwellings built per year on average.

3.33 The section on the amount and distribution of development includes the option of relaxing controls over rural development, allowing the villages to expand. The Local Plan Review must predict the environmental, social and economic consequences of such a shift in policy. The existing policy approach was designed with environmental sustainability in mind. New housing in rural areas inevitably leads to an increase in traffic on rural roads, contributing to transport-related carbon emissions. While people might still own cars if they live in the towns, their routine travel distances are likely to be considerably shorter than if they live in the countryside or a village with fewer services, and must always drive a significant distance to work/school/shops. However, housing affordability is a critical issue in the villages, with many young people unable to buy their own home or stay in the community they grew up in. Increasing the supply of housing throughout the district might bring social and economic benefits that outweigh the negative impacts of increased traffic. This is something the Local Plan Review must carefully consider.

Options

Option 1

Continue with current strategy but reassess which villages should be defined as settlements suitable for development.

Option 2

Take a more permissive approach to development in villages (see Amount and Distribution of Development section).

Managing Development

4.1 The Local Plan Part 3: Development Management Policies (LP3) is the latest set of policies for managing individual proposals for housing, business and community facilities. LP3 has not yet been adopted but has been prepared in the light of recent national policy, so is more up-to-date for the purposes of the Local Plan Review than the old Local Plan that was adopted in 2006.

4.2 There are also some policies in the Allocations and Infrastructure Development Plan Document (AIDPD, Local Plan Part 2) which are best considered in this section, relating to proposals for gypsy and traveller accommodation and 'exception sites' for affordable housing.

4.3 The Local Plan Review is likely to contain a version of development management policies that is similar to those in LP3 and the AIDPD. The examination process has resulted in some adjustment to LP3 policies. The latest version at the time of printing is available to view at <http://www.middevon.gov.uk/CHttpHandler.ashx?id=19504&p=0>, but updates to the status of LP3 will be made as soon as they become available, at www.middevon.gov.uk/lp3. Policy titles are as follows:

Sustainable development principles	Presumption in favour of sustainable development
	High quality design
	Sustainable design
	Waste management
	Renewable and low carbon energy
	Transport and air quality
	Pollution
	Parking

Residential development	Cross subsidy of affordable housing
	Rural workers' dwellings
	Conversion of rural buildings
	Replacement dwellings
	Extensions and ancillary development
	Design of housing
	Dwelling sizes
	Gypsy and traveller accommodation

Retail, business and tourism	Town centre development
	Development outside town centres
	Fronts of shops and business premises
	Rural shopping
	Rural employment development
	Protection of employment land
	Agricultural development
	Equestrian development
Tourism and leisure development	

Environment	Development affecting heritage assets
	Green infrastructure in major development
	Protected landscapes
	Other protected sites

Community facilities	Community facilities
	Protection of recreational land and buildings

Enforcement	Planning enforcement
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Options

Option 1
Roll forward the existing LP3 policies into the Local Plan

Review

Option 2
Amend the policies in response to any updates to national policy or guidance, and any lessons learned through the implementation of LP3 policies.

How to get involved

Questions

If you would like to make your views known at this early stage in the Local Plan Review, please consider the various options set out in this report and tell us:

- What options do you prefer under each of the headings?**
- Are there any alternative options you think we should consider?**

Responses may be submitted in the following ways:

Email: planningconsultations@middevon.gov.uk

Online questionnaire: www.middevon.gov.uk/localplanreview

Post/deliver to: **Local Plan Review**
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton EX16 6PP

Important:

Consultation responses must include the sender's postal address in order to be registered. Addresses will only be used to keep you informed about the new Local Plan and other planning policy matters.

The deadline for consultation responses is 19 August 2013

What happens next?

Over the coming months we will consider the consultation responses, gather more evidence and prepare a draft Local Plan for consultation. Some key milestones:

- January – February 2014:** ▶ **Consultation on draft Local Plan**
- June 2014:** ▶ **Preliminary consultation on a charging schedule for the Community Infrastructure Levy (CIL)**
- October-November 2014:** ▶ **Publication of Local Plan and draft CIL charging schedule (final consultation)**
- December 2014:** ▶ **Submission of Local Plan and CIL charging schedule to Secretary of State for examination**
- February 2015:** ▶ **Examination in Public**
- May 2015:** ▶ **Local Plan adopted**