

LOCAL PLAN REVIEW PROGRESS AND PRELIMINARY KEY DECISIONS

Cabinet Member: Richard Chesterton
Responsible Officer: Head of Planning & Regeneration

Reason for Report: To report the progress of the Local Plan review and the Strategic Housing Market Assessment, and identify preliminary preferences on the strategic direction of the Local Plan.

RECOMMENDATION: That

- a) progress on the preparation of the Local Plan and the preparation of the SHMA is noted,
- b) members endorse a preference for a new settlement strategy being the location of a large urban extension to the east of Cullompton instead of the current town centred strategy, and
- c) a report on a revised Local Development Scheme is prepared for the next meeting of the Cabinet on 2nd October.

Relationship to Corporate Plan: The Local Plan is the prime mechanism for the Council to achieve the Corporate Plan objectives of delivering a Thriving Economy, Better Homes, Empowering our Communities and Caring for the Environment.

Financial Implications: The financial implications for the preparation of the local Plan are reflected in existing budgets. The Local Plan is a key driver for future economic growth in Mid Devon

Legal Implications: The review of the Local Plan will enable the Council to make sound decisions and more robustly defend appeals against those decisions.

Risk Assessment: The review of the Local Plan will reduce the risk of costs being awarded against the Council providing decisions are based on its revised policies and help to ensure that the Council maintains a supply of developable sites.

1.0 Background

1.1 The currently adopted Local Plan for Mid Devon consists of the Core Strategy (Local Plan part 1) adopted in 2007, the Allocations and Infrastructure DPD (Local Plan part 2) adopted in 2010 and the Development Management Policies (Local Plan part 3) adopted in 2013. Plans must be kept up to date to ensure that they are based on the latest evidence and Government guidance. The basis for the housing figures in the Core Strategy is now over 7 years old and predates the 2011 Census. With the publication of the National Planning

Policy Framework (NPPF) in 2012 plans which predate it must be revised to take account of its provisions. Only Local Plan part 3 is fully in accord with the NPPF. The population in Mid Devon has grown at a much faster rate over the past 20 years than England, the South West or Devon and is forecast to grow by approximately 15,000 people between 2006 and 2031. As a result the Council has to plan to meet the needs of a growing population over the timescale of the new Local Plan. Without an up to date Local Plan Mid Devon could also find itself vulnerable appeals on the basis of five year land supply. For these reasons the Cabinet approved a programme for preparing the new Local Plan, which is the Local Development Scheme (LDS), at its meeting on 9 May 2013 which aimed to achieve adoption of the new Local Plan by May 2015.

2.0 Local Plan progress and key strategic housing decisions

- 2.1 In 2013 public consultation was undertaken on a Local Plan Review Scoping Report which set out the background to the review, the issues the new Local Plan will need to address and some broad options for dealing with the issues. The Council also undertook a 'call for sites' as part of the preparation of a Strategic Housing Land Availability Assessment (SHLAA) in 2013 to ascertain the areas of land that are available for housing development.
- 2.2 The Local Plan Options Consultation Document which indicated the Council's strategic options for development and the sites that could be allocated for development was then subject to an eight week consultation period running from 24th January to 24th March 2014. The Council received 1,201 valid representations in response to the consultation. The consultations showed significant opposition to further housing development in Tiverton and to significant development in the villages, a majority of opposition to development at Junction 27 for commercial and housing development and overall support for the development of a strategic housing site to the east of Cullompton. Subsequently the Council's Planning Policy Advisory Group (PPAG) has met a number of times during July and August to consider the content of the proposed submission document.
- 2.3 The Council has also commissioned the preparation of a broad range of evidence across a range of subjects to support the submission Local Plan. This includes reports on flood risk, habitat impacts, carbon impacts, traffic impacts and public open space requirements. The Council has also commissioned a Strategic Housing Market Assessment (SHMA) in conjunction with four other authorities to establish the level and type of housing that the new Local Plan should provide for. This study has still to be finalised and this matter is covered in more detail later in this report but work by the County Council on household forecasts produced in support of the SHMA indicates that purely to meet the expected growth in Mid Devon's population a total of 7,187 new households will need to be planned for between 2013 and 2033. Fine tuning of the projection methodology is still to be completed so this figure may change but it indicates the likely minimum

housing need in Mid Devon and is sufficient basis for key strategic decisions to be taken on the broad directions for future housing growth in Mid Devon.

- 2.4 The Local Plan Options Consultation referred to above set out two options for meeting Mid Devon's future housing need which were continuing with the current town centred approach or pursuing one of two options for a new settlement either to the east of Cullompton or to the north of Willand. Since the close of the consultation extensive work has been undertaken to further develop the Local Plan and determine which of the suggested strategic options should be selected. Prime amongst this work has been a consideration by the County Council of the likely traffic impacts of the two potential new settlements. That work has established that the creation of a new motorway junction to the south of Cullompton with south facing slips is broadly feasible. The Highways Agency has indicated that further detailed design work will be required and a detailed strategic case will need to be made for a new junction before they can support the proposal but they have not rejected the possibility of a new junction at this stage.
- 2.5 In considering whether to proceed with the current town centred approach or a new settlement a key determinant is the practical availability of land to meet the current approach. In the case of Crediton only limited amounts of land are practically deliverable as housing sites so the capacity for Crediton to play its part in a town centred approach is very limited. In the case of Tiverton land to the north of the A361 has not been made available for development by the landowner and topography means that viable housing sites are in short supply to the west and south of the town. This leaves expanding the town further to the east beyond existing commitments as the only option for further significant development which means that Tiverton also has limited potential to deliver its part in a town centred approach. In order to meet the future need for housing it is therefore inevitable that a significant proportion of housing would need to be located in Cullompton even if the approach was to remain town centred.
- 2.6 Cullompton does not suffer from the topographical limitations that affect Crediton and Tiverton with significant amounts of land being suitable and available for development, as evidenced by the site suggested for development to the east of Cullompton. It also has the potential to increase its sustainable transport connections by the future development of a new railway station and already has allocated employment sites with suitable sites for further expansion of employment. In comparison the other potential new community site to the north of Willand is not located next to an existing town and there are only limited commercial development opportunities at present. In sustainability terms therefore the new settlement option at Cullompton is superior in sustainability terms and the National Planning Policy Framework (NPPF) states that planning should focus significant development in locations which are or can be made sustainable. This approach cannot apply to the villages in Mid Devon as they do not possess the substantial facilities, population base, infrastructure and services that a town has.
- 2.7 As the work of the County Council has established that the traffic impact of significant new development can be accommodated through improvements to

the road network serving Cullompton the Council is now able to indicate its preference for the significant development of Cullompton through a large urban extension as the most suitable option for meeting the future housing needs of Mid Devon. This is in accord with the wishes of Cullompton Town Council who have consistently expressed their desire for significant levels of development and reflects the strong support expressed in the responses to the options consultation for the development of a significant area to the east of Cullompton. The NPPF at paragraph 52 that local planning authorities should work with their communities to determine whether the option of larger scale development such as new settlements or extensions to existing villages or towns provide the best way of achieving sustainable development.

- 2.8 The need for significant infrastructure works to support development to the east of Cullompton means that the larger amount of housing that can be directed there the more viable development becomes up to any capacity limit imposed by infrastructure. It is therefore not advisable to split development to allow limited development at Tiverton beyond existing commitments such as the Eastern Urban Extension as the development of a lesser number of houses at Cullompton would be significantly less viable. Lower levels of development in Cullompton could also make the delivery of new services and facilities such as a new railway station more unlikely. This position may have to be addressed again to take account of the final content of the SHMA but based on current information there is no intention to allocate significant development to Tiverton beyond existing commitments.
- 2.9 Based on current evidence the Cabinet are therefore recommended to select the new settlement strategy option rather than the town centred strategy option and to select the option of what can be described as a large scale urban extension to the east of Cullompton rather than what would amount to a new settlement to the north of Willand. This recommendation does not contradict the allowance for very limited development in Mid Devon's larger villages which was a feature of both the town centred and new settlement options. The sites to be allocated for development cannot be identified at this stage because the exact requirement for new housing in Mid Devon has not been established.

3.0 Strategic Housing Market Assessment (SHMA)

- 3.1 The NPPF states at paragraph 47 that local planning authorities should use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. The evidence referred to is a SHMA which the NPPF says at paragraph 159 should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period. Mid Devon along with East Devon, Exeter, Teignbridge and Dartmoor which together make up Exeter's Housing Market Area (HMA) therefore engaged David Couttie Associates (DCA) through a tender process to undertake a SHMA.

- 3.2 Following the production of the NPPF in 2012 the Government issued the National Planning Policy Guidance (NPPG) in March 2014 to replace a variety of existing detailed guidance including the 2007 SHMA guidance. This introduced more detail on the NPPF's requirement at paragraph 158 to take account of relevant market and economic signals. This essentially indicates that where economic development will mean that new jobs are created local planning authorities will need to be specific about where the workers will be sourced and that market signals such as house and land prices may mean that more housing should be allocated than would otherwise be the case.
- 3.3 This guidance is now being interpreted by Inspectors in Local Plan Examinations and the approaches taken by Inspectors to estimating housing need have been taken into account in guidance produced by the Planning Advisory Service (PAS) in June 2014. This indicates that assuming that workers will be found through changes to commuting patterns is a risky strategy as there is no guarantee that such an approach will work. Instead the PAS guidance indicates that if significant job growth is expected to take place beyond the number of new workers generated by predicted population growth then new housing to accommodate the extra workers required should be allocated in the area concerned or in other parts of the HMA.
- 3.4 Following discussions with the other authorities it has been agreed that this represents a new factor in the SHMA and further work is required to establish the implications of expected economic growth for the SHMA. The SHMA therefore cannot be finalised in time to meet the timetable set out in the approved LDS. The Exeter HMA authorities will therefore need to agree how this work should be undertaken and what the timetable will be for completing the SHMA. Other aspects of the SHMA also require further work in relation to such matters as market signals which will be addressed at the same time as the work to address economic growth in order to meet the requirements of the brief for preparing the SHMA. The completed SHMA will then inform the content of the Mid Devon Local Plan which will then be considered by Cabinet and Council prior to consultation on the published submission Local Plan leading to a public Examination.

4.0 Future timetable for the Local Plan Review

- 4.1 In order to meet the requirements of the Council's Statement of Community Involvement (SCI) it was proposed that the Local Plan would be approved at three Cabinet meetings in Tiverton (4th September), Crediton (11th September) and Cullompton (18th September). The whole Local Plan proposed submission document was then to be considered by an Extraordinary meeting of the Council on 1st October 2014. This would have broadly met the Council's approved Local Development Scheme (LDS) but as the SHMA has not reached a point where its content can be relied on as the basis for a submission Local Plan to be considered by Council the proposed meetings have been cancelled.

- 4.2 Following a meeting of the Exeter HMA authorities it has been agreed that a timetable for completing the SHMA will be agreed for its completion as soon as possible. This will be facilitated by discussions between the County Consultation and the prospective consultants in consultation with the partner authorities. The latest position on the timetable for completing the SHMA will be reported verbally to Cabinet. It is hoped that the this further work will allow the Cabinet to consider the submission Local Plan at meetings in November with a view to gaining Council approval for consultation in January and February next year. Once the SHMA timetable is known these dates will be finalised and will be used to prepare a new LDS which will be brought to the October meeting of the Cabinet.

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