

Sandra Hutchings

From: Linda Renshaw
Sent: 19 March 2014 09:08
To: DPD
Subject: East Devon District Council comments on Local Plan Review - UNCLASSIFIED:
Attachments: Mid Devon LP Review Options 040314.pdf

Thank you for consulting East Devon on your local plan options. Please find attached a report to the Development Management Committee that sets out the context for the East Devon District Council comments submitted via your survey form yesterday. Below is an extract from the minutes of the relevant meeting.

Mid Devon – Local Plan Review Options Consultation

The Committee considered the Planning Policy Manager's report, presented by a Senior Planning (Policy) Officer in his absence. Mid Devon District Council was currently consulting on its Local Plan Review Options, which would ultimately supersede its existing Core Strategy adopted in 2007. The new Local Plan was proposed to run from April 2013 until March 2033. East Devon had a 'duty-to-cooperate' with Mid Devon on strategic issues that affected more than one area.

There were two spatial options outlined in the Options paper:

1. A continuation of the existing strategy of focussing development in the three main towns within the district, with the largest allocations in Tiverton;

2. To direct long term growth to a new community to east of either Junction 27 or Junction 28 of the M5 Motorway. Housing development would not be expected to start until after 2026. However major commercial developments (including retail and leisure) at Junction 27 could commence sooner.

The Committee was advised that neighbouring authorities had raised concerns regarding the scale of development proposed, particularly the retail and leisure uses at Junction 27 and the anticipated speed of delivery of elements of the proposals in the absence of an agreed sub regional strategy to guide long term planning. Local Plans were required to have a robust evidence, however there was felt to be a lack of evidence to underpin the options set out. Members' attention was drawn to the location plans and comparisons of new settlement proposals to Cranbrook, Honiton and Exmouth appended to the report. During discussion about the options outlined, Members raised concern about the scale, timetable for delivery and sustainability of the proposals. The length of the Plan period and short review period were also raised. A Ward Member for Broadclyst, whose area also included the new community of Cranbrook, stated that he had always felt the better location for a new community was at Junction 27 due to Development Management Committee, 4 March 2014

its good transport links. He also advised that people living in the north east of the district might welcome recreational facilities in this area. **RESOLVED:**

1. that East Devon District Council supports a spatial strategy of focussing growth in the main Mid Devon Towns (Option 1) subject to evidence on commercial floorspace and housing numbers;

2. that East Devon District Council requests that, should spatial strategy option 2 emerge as the preferred Mid Devon option, work on the Plan review be suspended until further work is undertaken within the Exeter Housing Market Area to assess strategic options at a sub regional level.

3. that East Devon District Council objects to commercial development at Junction 27 of the M5 as proposed in Policy J27.



4. that delegated authority be granted to the Planning Policy Manager to formally comment on the Mid Devon Options Consultation on the basis of the above recommendations and with justification drawn from text in the Committee report.

Linda Renshaw (Mrs)
Senior Planning Officer
Tuesdays, Wednesdays and Thursdays
East Devon District Council



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Agenda Item

Development Management Committee

4 March 2014

MD/L/02/34

Mid Devon – Local Plan Review Options Consultation

1 Summary

- 1.1 Mid Devon District Council is consulting on its 'Local Plan Review Options' until 24th March 2014. This will ultimately supersede the existing Mid Devon Local Plan, which comprises a Core Strategy (adopted 2007), Allocations and Infrastructure DPD (adopted 2010) and Development Management Policies (adopted 2013). The new plan runs from 1st April 2013 until 31st March 2033.
- 1.2 Two spatial strategy options are outlined. The first option outlined is a continuation of the existing strategy of focussing development in the three main towns with the largest allocations in Tiverton. The second approach is to direct long term growth to a new community to the east of either Junction 27 or Junction 28 of the M5 Motorway. Housing development under this option would not be expected to start until later in the plan period (after 2026) although under this option major commercial developments at Junction 27 (including retail and leisure) could commence sooner (the plan places a strong presumption in support of major commercial development at this junction). Mid Devon state that the second option is being considered because of the difficulty of finding sites well related to Crediton and Tiverton due to the surrounding geography.
- 1.3 East Devon District Council has a 'duty to co-operate' with Mid Devon on strategic issues that affect more than one area and Mid Devon has hosted talks at both Officer and Member level to discuss the implications of policies and proposals emerging through the local plan review. These discussions have also involved other neighbouring authorities, including Exeter and Taunton and notes of the meetings are available at [East Devon District Council - Duty to Co-operate](#).
- 1.4 Neighbouring planning authorities have raised concerns regarding the scale of development proposed (particularly the retail and leisure uses at Junction 27), the lack of evidence to underpin the options under consideration and the anticipated speed of the delivery of elements of the proposals in the absence of a sub regional strategy agreed to guide long term planning.

Recommendation

1. That East Devon District Council support a spatial strategy of focussing growth in the main Mid Devon Towns (Option 1) subject to evidence on commercial floorspace and housing numbers.
2. That East Devon District Council request that, should spatial strategy option 2 emerge as the preferred Mid Devon option, work on the plan review is suspended until further work is undertaken within the Exeter Housing Market Area to assess strategic options at a sub regional level.
3. That East Devon District Council object to commercial development at Junction 27 of the M5 as proposed in Policy J27.
4. That delegated authority is granted to the Planning Policy Manager to formally comment on the Mid Devon Options Consultation on the basis of the above recommendations and with justification drawn from text in this report.

a) Reasons for Recommendation

To help meet our duty to co-operate and ensure the interests of East Devon are recognised in the Mid Devon plan making process.

b) Alternative Options

Alternative responses could include:

- 1 Not commenting on the plan;
- 2 Amending the existing comments; or
- 3 Commenting on other parts of the plan.

c) Risk Considerations

No specific risks are noted though there is a legal duty to co-operate on strategic issues that affect more than one area.

d) Policy and Budgetary Considerations

No specific policy or budget implications are noted, however the report and proposals of Mid Devon District Council need to be considered within the context of wider strategic development needs across the sub region.

e) Date for Review of Decision

No specific date for review is identified but response can be made to any future consultation including at the Publication consultation stage.

2 Background to the Mid Devon Local Plan Review Options Consultation

2.1 Timescales - Mid Devon District Council (MDDC) is consulting on options for their local plan review from 24th January 2014 until 24th March 2014. The plan will run from 1st April 2013 until 31st March 2033 – the adopted Core Strategy runs from 2006 to 2026. MDDC is working to the following tight timescale:

- Initial Options consultation – Jan/Feb 2014
- Submission to Secretary of State – Sep 2014
- Examination – Jan/Feb 2015
- Adoption May 2015

2.2 Housing and Employment levels – The plan proposes around 8,400 dwellings and 154,000 square metres of commercial floorspace over the plan period. The options consultation has been prepared in advance of the Strategic Housing Market Assessment for the Exeter Housing Market Area (which has been commissioned and also includes East Devon, Exeter City, Teignbridge District and part of the Dartmoor National Park). The consultation is based on the previous plans target of 350 dwellings per year plus 20% to take account of the latest population projections and the Governments intention to increase housing supply. An employment land review from 2013 indicates that the market is unable to support the delivery of all the employment sites in the current plan and MDDC are considering reducing some existing employment allocations in the towns. Their analysis shows that 65% of employment floorspace built since 2006 is located outside of the three main towns and that there is demand for small scale sites all around the district.

2.3 Spatial Strategy – MDDC has identified two strategic policy options for how development might be distributed around the district, but only one option will be included in the final draft of the plan.

Option 1 proposes to concentrate development at Tiverton, Cullompton and Crediton to a scale appropriate to their individual infrastructures, economies and constraints. Development targets for option 1 are set out in the table below:

Location	Residential* (dwellings)	Commercial* (square metres)
Tiverton	3,600 (2,223)	49,000 (126,548)
Cullompton	2,400 (1,527)	46,700 (55,000)

Crediton	800 (298)	5,300 (6,500)
Rural areas	1,600 (192)	53,000 (50,175)
Total	8,400	154,000

* Figures in brackets indicate the number/amount already allocated in the Local Plan at 31st March 2013 (without planning permission)

Option 2 proposes that residential development of up to 5,460 dwellings from 1st April 2013 would be concentrated in the three main towns. Later in the plan period strategic residential growth of around 2,490 dwellings would be directed to a new community located either adjacent to Junction 27 of the M5, or at Junction 28 as an expansion to Cullompton. The maps at Appendix 1 show the alternative locations for the new community. Maps (to a consistent scale) showing the areas concerned in relation to the current size of Exmouth, Honiton and Cranbrook are included in Appendix 2 to allow for simplified size comparison. The option of a new community is proposed on the basis that, later in the plan period, it will become problematic to continue focussing the majority of development in the three main towns due to land availability and environmental constraints. Residential development of the new community would not commence before April 2026 or the completion of 5,460 dwellings elsewhere, whichever is the sooner. In addition to the residential element, option 2 includes proposals for large scale commercial development as part of the new community. The commercial element at Junction 27 is already being promoted by a developer and, if allocated, could come forward much earlier in the plan period than any residential development. The option for Junction 27 includes 200 hectares to include 3000 dwellings and 96 hectares for commercial floorspace (subject to an impact assessment which they advise needs to demonstrate no adverse impact on town centre vitality and viability). The draft policy gives a list of uses that 'might' be included as:

- 25 hectares for B8;
- 13 hectares for outdoor leisure;
- 8 hectares for retail outlet;
- 4.5 hectares for Devon produce promotion centre;
- 3.3 hectares sports and activity centre including retail;
- 3 hectares for cinema;
- 1.9 hectares for motorway service area;
- 1.8 hectares for hotel, conference venue and concert hall; and
- 0.8 hectares for regional visitor centre.

2.4 The option of a new settlement at Junction 28 is not currently supported by development interests, but it is understood to have been suggested by Cullompton Town Council. Development targets for Option 2 are set out in the table below.

Location	Residential*(dwellings)	Commercial* (square metres)
Tiverton	2,340 (2,223)	31,800 (126,548)
Cullompton	1,560 (1,527)	30,400 (55,000)
Crediton	520 (298)	3,400 (6,500)
Rural areas	1,040 (192)	34,400 (50,175)

M5 J27 (Willand) or J28 (Cullompton)	2,940	54,000
Total	8,400	154,000

2.5 Issues Raised by Options Consultation

Strategic Planning Context

The Mid Devon proposals raise a number of concerns, many of which are related to the absence of any form of agreed sub regional strategy. Members may recall that, prior to their abolition, structure plans dealt with strategic planning matters within a county boundary. Regional Spatial Strategies, prior to their abolition, dealt with strategic issues at a 'higher' level but also gave a clear steer on appropriate locations for significant commercial and housing developments. The new settlement proposals for Cranbrook were developed within a wider strategic context. In the absence of strategic planning at either regional or county level the Government expects 'joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities' (NPPF paragraph 178). The NPPF further states that 'local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans' (paragraph 179). This 'duty to co-operate' was introduced in November 2011 when the local plans within the Exeter Housing Market Area were at an advanced stage of production. Much of the work that underpins this round of local plans was undertaken in the context of a higher tier of strategic guidance, which identified Exeter as the focus for commercial development in the sub region.

The Mid Devon review is the first in a new generation of plans in the Exeter Housing market area that will be wholly developed in the context of the duty to cooperate rather than a higher level spatial strategy. Whilst the aspirations of Mid Devon for a quick local plan review are appreciated, there is a danger that decisions made could set a pattern of development that could have detrimental impacts on a wider area, including East Devon. In particular the strategy proposed under Option 2 could undermine the execution of the East Devon Local Plan strategy, including the delivery of employment opportunities in the 'West End' and the new settlement at Cranbrook. It would be preferable for future development plans to come forward after there has been an opportunity for further joint working between the Exeter HMA authorities and this has been considered with neighbouring authorities that may have an interest (such as Taunton Deane). Much of the housing evidence needed is already being worked on jointly (a joint Strategic Housing Market Assessment has been commissioned and it is hoped that a joint Strategic Housing Land Availability Assessment can commence this year). A 'Duty to Co-operate Protocol' between all the Devon Authorities and relevant agencies (such as Natural England) is due to be finalised shortly. Further discussions will be needed between the authorities about the scope, process and mechanisms for further work and it is anticipated that a further report will be taken to this Committee to agree East Devon's role.

2.6 Housing

The scale of housing proposed (3000 dwellings) is relatively small for a new settlement – the provision of a secondary school is widely considered to be critical to the level of sustainability that can be achieved and this usually requires about twice the level of housing proposed. Whilst Mid Devon have produced their proposals to meet their own housing need, there may be a case for arguing that if another new settlement is to be built within the housing market area it ought to cater for a wider proportion of the sub regional need. The longstanding strategic approach to policy, as set down in the Devon Structure Plan and South West Regional Strategy, recognises that some growth associated with the wider role of Exeter needs to be accommodated beyond the City Council boundary (this forms part of the justification for Cranbrook). One of the issues that needs to be addressed through sub regional discussions/agreement is the best means of meeting Exeter's growth needs post 2026 (the end date of the Exeter Core Strategy). The potential for a new settlement in Mid Devon would be best assessed as part of these wider considerations.

2.7 Commercial

One of the most alarming parts of the Mid Devon options is the scale of commercial development being considered at Junction 27 in advance of any housing provision. This site is set in open countryside and is wholly unrelated to any existing settlement. The maps in Appendix 2 give an indication of the scale of the commercial development proposed in relation to the existing employment areas and town centres of Honiton and Exmouth and in relation to the proposed town centre at Cranbrook. The area proposed for commercial use is proportionately much larger than in any of the comparator towns, even when the 3000 homes are included, and there is a danger with the proposed policy that the commercial development would happen without any housing growth contrary to sustainable patterns of development. Many of the uses listed are most appropriate within a town centre location, particularly the 8 hectares of retail and 2.4 hectares for cinema use. Although the proposed policy states that the 96 hectares for mixed commercial floorspace would be subject to an impact assessment to demonstrate no adverse impact on town centre viability and vitality there is no evidence of work having been undertaken to assess the impact on nearby town centres, of which Honiton and Cranbrook would be closest in East Devon.

2.8 Conclusions

Mid Devon have committed to a very quick timetable to review their local plan up to 2033 and without important evidence to underpin their options consultation. To progress major proposals that deviate from the established strategy of directing growth to the main towns could have sub regional implications that ought to be considered between the authorities affected. These assessments should include sub regional options for meeting the growth needs of Exeter beyond 2026. The scale of commercial development at Junction 27 is unjustified in this location and could have a detrimental impact on commuting, shopping and leisure patterns.

3. Viewing the Plan and Deadline for Comments

- 3.1 The Mid Devon Local Plan Review Options Consultation can be viewed at:
[Local Plan Review](#)
- 3.2 Comments on the plan need to be made by 24th March 2014.
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Legal Implications

There are no legal implications arising

Financial Implications

There are no financial implications.

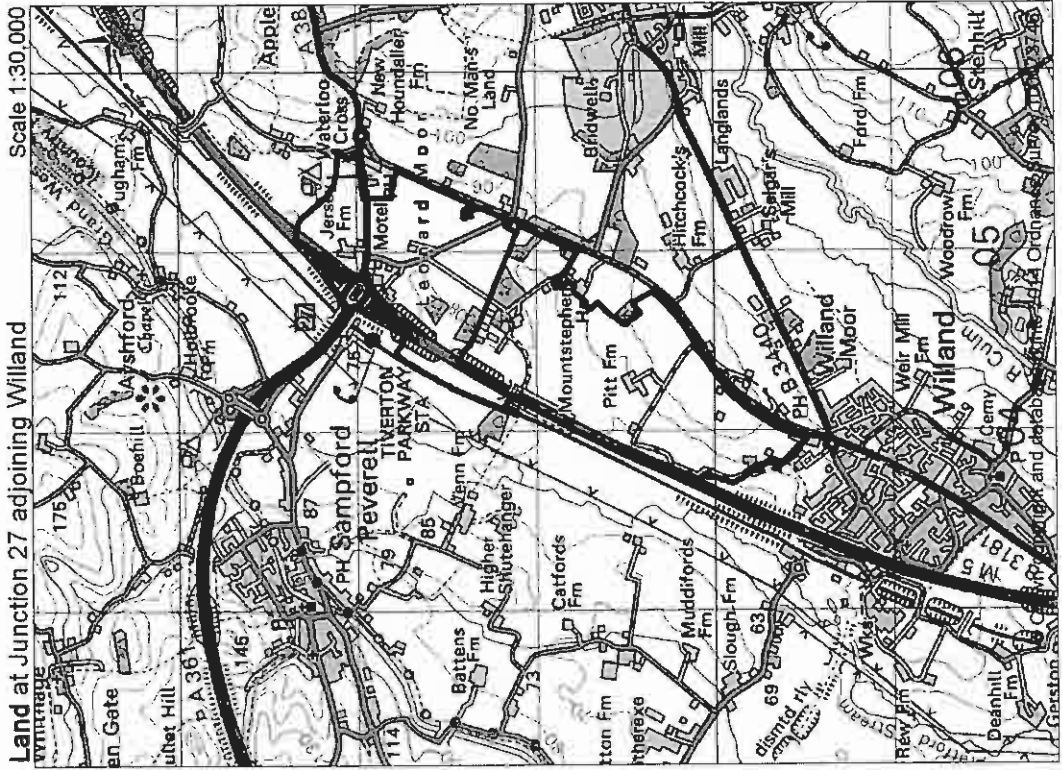
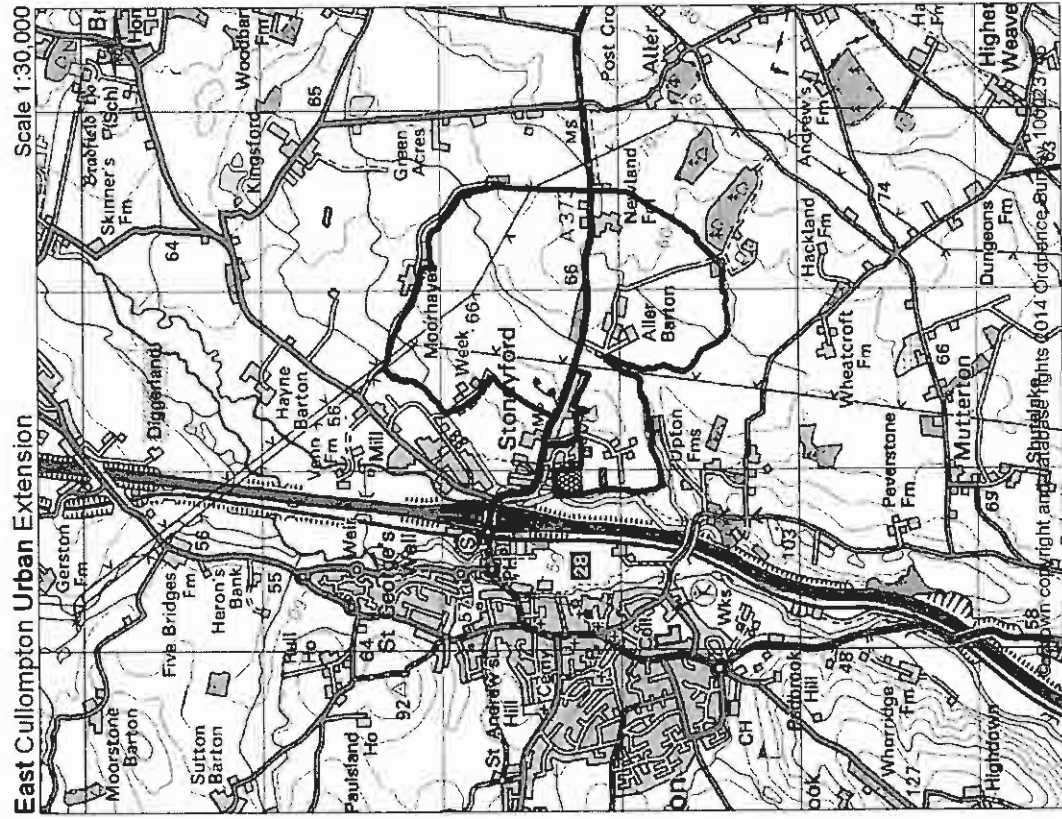
Background Papers

See the Mid Devon Local Plan Review Options Consultation at [Local Plan Review](#)

Matthew Dickins
Planning Policy Manager

Development Management Committee
4th March 2014

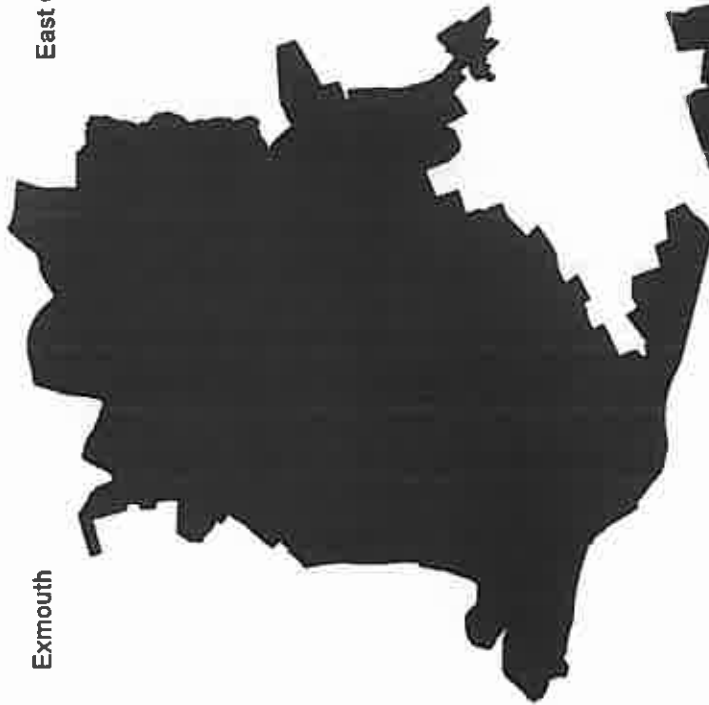
Appendix 1 Location of New Settlement Options



Appendix 2 Comparison of New Settlement Proposals to Cranbrook, Exmouth and Honiton



Exmouth



East Cullompton Urban Extension



Land at Junction 27
adjoining Willand



Cranbrook



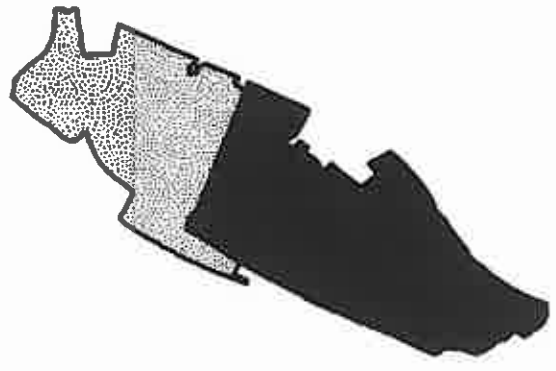
Honiton



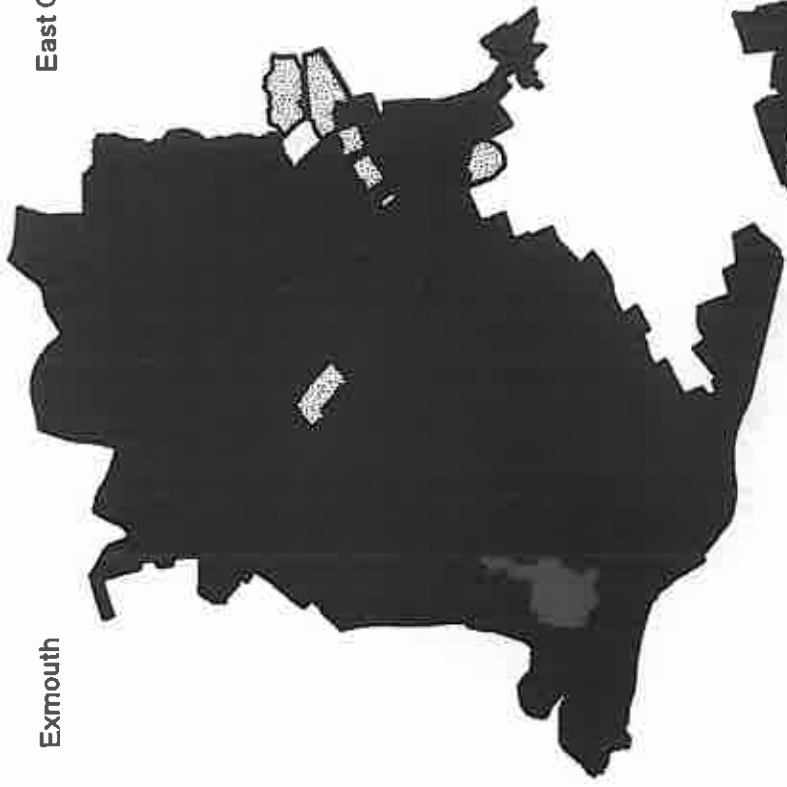
Scale 1:30,000



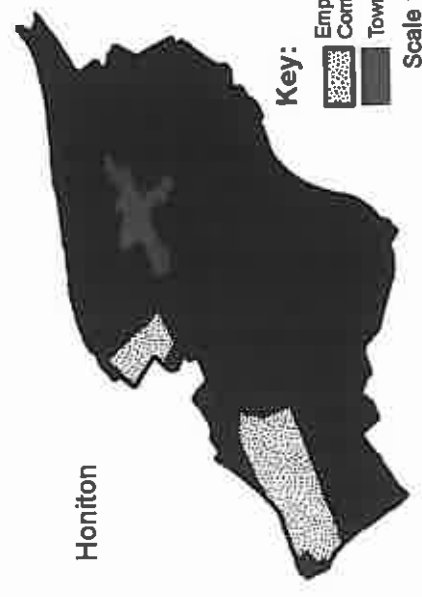
Land at Junction 27
adjoining Willand



East Cullompton Urban Extension



Exmouth



Honiton



Cranbrook

Key:
 Employment and Commercial Site
 Town Centre Area
Scale 1:30,000

Customer Feedback

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Default Report

Displaying 84 of 152 respondents

Response Type: Normal Response	Collector: Web Link (Web Link)
Custom Value: empty	IP Address: 95.131.110.118
Response Started: Tuesday, March 18, 2014 9:05:53 AM	Response Modified: Tuesday, March 18, 2014 4:06:44 PM

1. Do you agree with the Vision and Spallal Strategy?

East Devon District Council support a spatial strategy of focussing growth in the main Mid Devon towns (Option 1) subject to evidence on commercial floorspace and housing numbers. Should spatial strategy 2 emerge as the preferred Mid Devon option, East Devon District Council request that work on the plan review is suspended until further work is undertaken within the Exeter Housing Market Area to assess strategic options at a sub regional level. East Devon District Council object to commercial development at Junction 27 of the M5 as proposed in Policy J27.

2. Draft Policies S1 and S2 set out the Council's approach and priorities for sustainable development. What is your opinion about these policles?

no comments

1. Policy S3 Includes two options for the distribution of development over the plan period (2013-2033). The first option is to continue focusing development in the three main towns according to their current sizes and roles. The second option is to provide for long-term growth (post-2026) in a new community. A separate question deals with the location of a new community, but please indicate your opinion in principle below. Which option do you prefer and are there alternative options we should consider?

Option 1: Continue to focus most development in the towns up to 2033

East Devon District Council is concerned that Option 2 could have detrimental impacts on the wider area and could undermine the execution of the East Devon Local Plan strategy (including the delivery of strategic employment options and the new settlement of Cranbrook). In order to meet the 'duty to cooperate' alternative spatial strategies should be informed by joint working between the Exeter HMA authorities to consider options for sub regional growth patterns.

2. If the Council chooses to pursue Option 2 under Policy S3 (the new community option), which location would you prefer and why?

East Devon District Council consider that the location of any new settlement should be considered as part of a sub regional review of options for meeting the growth needs of Exeter post 2026. The scale of housing proposed is relatively small for a new settlement. If a new settlement option is pursued wider consideration should be given to whether it should cater for a wider proportion of the subregional need.

1. Policies S4-S6 are strategic housing policies setting out a potential target for annual rates of housing across the district, the proportion to be affordable and adaptable, the amount of public open space to be provided, and the Council's approach to ensuring housing delivery. Do you support these policies or have suggestions on how they could be improved?

no comments

2. Economy and Infrastructure policies are set out in Policies S7-S9 of the options document. These propose 154,000 square metres of commercial floorspace (including retailing) over the plan period (2013-2033) and set out the Council's approach to town centres and infrastructure delivery. Do you support these policies or have suggestions about how they could be improved?

no comments

1. Policy S10 seeks to sustain the quality of Mid Devon's environmental assets and minimise the effects of development on climate change. Do you support this policy and do you have suggestions about how it could be improved?

no comments

2. Policies S11-S15 set out strategic policies for the towns, villages and countryside, including expected annual rates of development for the towns which can vary depending on the options discussed under Policy S3 (amount and distribution of development). Do you support these policies and do you have suggestions about how they can be improved?

no comments

1. The Site Allocations section of the Local Plan Review options document includes numerous options for development sites in the towns and villages. These exceed the amount of development likely to be required, but the Council wishes properly to consider all the available sites before making decisions on which are most appropriate. Please tell us your opinion on specific sites in

this chapter of the plan, continuing on a separate sheet if necessary. Providing detailed reasons for any objections will help us evaluate and compare the suitability of different options.

East Devon District Council object to commercial development at Junction 27 of the M5 as proposed in Policy J27. This site is set in open countryside and is wholly unrelated to any existing settlement. The scale of commercial use and range of uses listed is contrary to sustainable patterns of development and is not justified through the plan.

2. The Council adopted its Development Management Local Plan (LP3) in October 2013. This plan is included in the options consultation without modification, but pages 102-107 explain where amendments or new policies are being considered. Do you have anything to say about the amendments or new policies being considered, or comments about the existing adopted policies included within the consultation document?

No Response

1. NOTE: RESPONSES CANNOT BE REGISTERED WITHOUT A NAME AND ADDRESS Name

East Devon District Council M Dickens PI Policy Manager

2. Please provide your postal address

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