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Dear Mr Guscott

## Mid Devon Local Plan Review - Options Consultation - Devon County Council Response

I would like to thank you for the opportunity to comment on the emerging Local Plan Review Development Plan Document (DPD) which is being prepared by Mid Devon District Council. This consultation is considered to be in accordance with the requirements of the Duty to Co-operate, as set out in National Planning Policy Framework (NPPF) paragraph 178. This response has been prepared in collaboration with the Highways Agency.

The document proposes three different options for growth in Mid Devon, and we are keen to work together with Mid Devon District Council to develop an evidence base which identifies the opportunities, potential constraints and mitigation measures for each of the options proposed. In accordance with the county council's statutory responsibilities, this will take into account transport, education, libraries, waste management and extra care housing. This will involve updating the existing infrastructure delivery plan.

This is clearly a process that will take some time and will therefore be undertaken over the forthcoming months. We are keen that this work is undertaken collaboratively and using an iterative, joint working process involving Mid Devon District Council and other stakeholders including the Highways Agency, Environment Agency and Network Rail.

As the plan is in an early stage of its development, there remains some uncertainty over some aspects, including the housing and employment requirements over the district, and how these should be distributed. Comments on these are set out below.

### Housing and employment requirements

It is important when preparing Local Plans to have a robust evidence base to support the overall amount of housing and employment allocated within the Local Plan. From this, stems the remainder of the strategy, including distribution in the context of such matters as environmental limits, infrastructure capacity and aligning employment opportunities with new housing.

The housing level set out in policy S3 of the consultation document is recognised as an interim figure which is likely to change once more up to date and robust evidence becomes available. It is welcomed that Mid Devon are working to develop the evidence base, as they are leading on the production of a new strategic housing market area assessment (SHMA) for the Exeter housing market area (within which Mid Devon sits). This will also provide more up-to-date evidence of the affordable housing need within the district, which may also change following further viability appraisal.

Once the strategic housing market area assessment has been undertaken, we would be keen to work with Mid Devon and the other Local Planning Authorities to identify how the final housing requirement for Mid Devon should be determined through cross-boundary collaboration and discussion as required by paragraph 179 of the NPPF. This could be by way of a sub-regional study to consider potential housing allocations in the context of the Exeter Housing Market Area as a whole. Such an approach reflects the NPPF paragraph 159, which sets out that Local Planning Authorities should prepare housing market assessments in conjunction with neighbouring authorities. This approach is also reflected in paragraph 007 of the 'Housing and economic development needs assessments' section of the new National Planning Practice Guidance.

In terms of the overall employment requirement set out in the plan, our understanding is that generally, the plan reduces the amount of employment gross floor area from that allocated in previous plans. This approach appears reasonable in that it takes account of market signals identified in paragraph 2.32, which is that the market is unable to support the previous allocations.

#### Distribution and phasing of housing development

Bearing in mind that the housing requirement contained within policy S3 may change, it is considered that there should still be flexibility over the growth strategy pursued in Mid Devon. As set out above, the evidence base will be refined to specifically consider the options included in the consultation document, and it is possible that further opportunities and alternative strategies for growth may present themselves. The county council believes it prudent to investigate these if and when they arise.

Our discussions with neighbouring authorities would suggest that it would be appropriate for the housing distribution within the districts in the Exeter housing market area (HMA) to be determined in the context of the HMA as a whole. This would ensure that housing is focussed to the most suitable and deliverable locations in the HMA in accordance with the requirements of the NPPF.

Notwithstanding the above, policy S3 does include allocations for housing around the district. This is split into two options, these being option 1 (town focussed) and option 2 (new community). As set out above, the detailed opportunities and potential impacts of these options will be assessed in greater detail over the coming months. As such, the county council is unable to provide detailed comment on the options proposed at this stage.

Phasing of the housing growth is also a key consideration of the Local Plan. Whilst draft phasing has been put forward in strategy S3, it is considered that this will also need to reflect the outcomes of the further evidence production.

#### Distribution and phasing of employment development

As set out above, policy S3 considers two options for housing distribution, which also apply to employment land distribution. It is considered that employment and housing allocations should be balanced to reduce the need to travel, reflecting NPPF paragraph 30 which requires Local Plans to provide a pattern of growth that supports sustainable travel objectives. It is considered that the proposed employment distribution may therefore change as a result of further evidence production

and refinement of the housing distribution strategy and that the final phasing of employment allocations should reflect the phasing of housing provision.

### Infrastructure Requirements

The County Council is keen to assist in identifying the needs for strategic infrastructure including transport, education, libraries, waste management and extra care housing that will arise as a result of the development allocated in the final version of the Local Plan.

In terms of transport there is need to work with the Highways Agency on the options for development around the M5 Motorway. Our experiences of carrying out these studies are that it will take some time to come to an agreement on the impact and mitigation measures. We have begun the initial phase of the work in terms of developing models, identifying constraints and options. This work will be undertaken collaboratively with the Highways Agency, and initial meetings have taken place. We are keen to pursue collaborative working between ourselves, Mid Devon District Council and Highways Agency and will liaise in future to ensure this progresses.

Regarding education matters, we have begun the process of reviewing school capacities and condition in order to inform the preparation of the Local Plan. This information will be provided to the district council shortly.

Other infrastructure matters will be addressed in due course.

### Additional comments

Finally, a number of additional, less 'strategic' comments on the consultation document are included in Appendix I, attached to this letter. In addition, Appendix II includes comments on the sustainability appraisal accompanying the consultation.

The county council would again like to thank Mid Devon District Council for the opportunity to comment on the developing growth strategy for Mid Devon. We look forward to what we hope will be a collaborative period of joint working over the coming months.

Yours sincerely

Dave Black  
*Head of Planning, Transportation and Environment*  
*Devon County Council*

## Appendix I: Detailed schedule of comments on the Mid Devon Local Plan Review 'Options Consultation' Document

Section	Comments
Location and physical characteristics	<p>Paragraph 1.6 sets out that the district is well connected due to the 'strategic road network', mentioning that this connects the three main towns. However later in the same paragraph talks about significant transport routes including the M5. Generally, the term 'strategic road network' refers to the trunk road network, which doesn't connect to Crediton. It is considered that this paragraph could be revised to provide greater clarity.</p> <p>It is unclear what the map / plan in this section is attempting to set out. It is considered that it could be reasonably adjusted to clearly set out the Local Plan area, and if so, should make this clear. The map would also benefit from having a title and a clearer legend, as well as including railway infrastructure.</p> <p>Furthermore, the map could recognise cross-border context, including the relationship with other Local Planning Authority Areas and the location of surrounding settlements such as Exeter, Barnstaple and Taunton.</p>
Environmental features	<p>In addition to the topics covered in this section, the importance of the water framework directive and the need to ensure water quality is enhanced could be mentioned.</p>
Population and housing	<p>The county council is able to provide up to date population projections upon request.</p> <p>Tables in this section seem to have been included to set out the housing and population growth issues facing the district. It is important that these reflect the issues that the plan comes onto deal with later, specifically considering house prices and national undersupply of housing.</p> <p>The population table could be improved by also showing how housing numbers have changed over the same period, to illustrate how linked these two factors are.</p> <p>It would be beneficial if the tables in this section were formatted to the same size (e.g. the same length x axis).</p>
Resources	<p>'Resources' would also include mineral deposits in the district. The role of the county council in mineral planning, and the way in which this Local Plan will relate to minerals operations could be mentioned.</p> <p>Furthermore, paragraph 1.28 could be expanded to provide some context on how much renewable energy is generated in Mid Devon and provide information on energy efficiency programmes in the district.</p>
Infrastructure and transport	<p>This section could provide some context on the infrastructure that already exists within the district and locations where this is under pressure. It could also highlight the opportunities that</p>

Section	Comment(s)
	new development can bring to providing funding. Joint working and collaboration is a fundamental tool in ensuring that infrastructure provision is appropriate and this should also be mentioned. This would help to ensure that infrastructure is planned for positively as required by paragraph 157 of the NPPF.
Spatial strategy and sustainable development principles	<p>The vision, spatial strategies and sustainable development principles could be consolidated to improve their clarity.</p> <p>Efforts to ensure that community facilities such as schools are provided and to ensure a more sustainable transport network is developed are supported.</p>
Neighbourhood planning	This section could usefully set out that neighbourhood plans must be in accordance with the Local Plan.
Sustainable development principles	<p>Policy S2 would usefully refer specifically to education facilities, in point i).</p> <p>Also first sentence of para 2.4 could be improved by stating '...concentrating activities and facilities in locations accessible by non-car modes'</p>
Amount and distribution of development	<p>Paragraph 2.7 refers to population projections. These should be consistent with those in the 'facts and figures' (page 9). The new SHMA will contain population projections that should be used in future iterations of the plan.</p>
Policy S3	<p>Comments on the amount of development and general approach to development distribution have been made in the covering letter and will not be repeated here. In summary, the county council will work in collaboration with Mid Devon to refine the evidence base to more fully assess the options presented. However, there are some issues of clarity regarding the presentation of the two options in policy S3, which should be taken into account in future iterations of the document.</p> <p>In particular, the rationale for the distribution strategy for options 1 and 2 should be explained further through references to considerations such as an assessment of available sites or environmental capacity within the districts. Notwithstanding that the final distribution strategy has not yet been determined, it will be important in future versions of the plan to set out how the precise distribution, and therefore housing numbers in individual settlements, have been arrived at.</p>
Policy S3	<p>As per the above comment, the employment distribution set out in this policy is also not fully explained. Whilst there is a reference to the employment land review, its findings have not been fully summarised.</p> <p>Furthermore, considering the amount of land that can be allocated for employment in the rural areas as set out on page 98 of the consultation document, it may be that a single site would account for the full allocation. In this case, the other rural employment opportunities in the district may not</p>

Section	Comments
	<p>be allocated. It is considered that some balancing of the rural employment allocation may be required to ensure it is appropriately aligned to existing and new housing. See also comments on paragraphs 2.18 &amp; 2.19 below. This can be more fully assessed over the coming months as the housing distribution strategy develops (as set out in the covering letter).</p>
Paragraph 2.17	<p>This paragraph refers to an early review of the Local Plan once adopted. It is acknowledged that the Local Plan will need to be reviewed periodically, particularly if there are development supply issues. Changes in strategy could have significant implications for development and infrastructure delivery and therefore any revisions in this regard should be taken through engagement with partner authorities / organisations. It should be noted that, from experience elsewhere in Devon, large scale developments often take a number of years to deliver.</p> <p>There is also a reference to the 'strategic' road network which would be more appropriate to simply say 'transport network', as non-trunk roads and public transport should also be considered.</p>
Paragraphs 2.18 and 2.19	<p>These paragraphs set out that the employment areas allocated in the existing Local Plan have not successfully come forward and that instead, the majority of development has come forward outside of the main towns. Before this is accepted as a market signal, the reasons for this need to be considered. Currently, improvements to M5 Junction 28 have been partially completed (and are anticipated to be fully completed by Winter 2014). In addition, Junction 27 will be improved by April 2015 and plans for a new junction on the A361 to serve the Tiverton Eastern Urban extension are being progressed. In addition, the Crediton bypass is currently being constructed. Once these improvements are in place, it is considered possible that the trend for the majority of employment development locations to be in rural locations may be reversed.</p>
Housing	<p>As set out in the covering letter to this schedule, the amount of housing will be determined following the completion of the SHMA, which is ongoing.</p> <p>It is considered that the target of 35% affordable housing may be reviewed in consideration of the SHMA which is being undertaken and the viability evidence which is to be commissioned by Mid Devon District Council. This evidence will demonstrate the most appropriate levels of affordable housing in the district in combination with the infrastructure contributions needed to support development. Infrastructure provision is fundamental to supporting new growth and the total contribution from development needs to take account of this.</p>

Section	Comment(s)
	<p>There is a reference in para 2.24 to population projections. It needs to be ensured that the evidence base is consistent throughout the document, for example when viewed alongside the tables in the 'population and housing' section at the beginning of the consultation document. This paragraph also sets out that some units will be extra care housing. The county council is keen to work with MDDC to develop allocations for extra care housing in the district up to 2033.</p>
Policy S6	<p>This policy specifically mentions that open space will be provided by CIL. It is considered that for flexibility, this could simply refer to 'developer contributions'. Determining what infrastructure comes through CIL relates to the CIL charge setting procedure and infrastructure planning.</p>
Policy S7	<p>It is felt that the opportunities for employment development in the district could be more pro-actively supported. The policy would usefully refer to 'encouraging' sustainable employment development in the district. Generally, this policy could be more positively prepared, potentially stating that Mid Devon will work with employers to deliver sites.</p>
Town centres - policy S8	<p>Town centres are also the focus of public transport networks in the district. The policy would be improved by including a new point (e) that refers to promoting sustainable transport within the towns including modal interchange.</p> <p>This policy refers to historic conservation of the town centres which is supported, however the natural environment within town centres can also have a significant role in creating attractive environments and this should be recognised.</p>
Infrastructure - policy S9	<p>The intention to include a specific policy on infrastructure is supported. It is however considered that it could be improved and the following policy wording and structure is suggested:</p> <p><i>"The location, scale and form of development will be guided by the need for community facilities and the need to address any existing shortages.</i></p> <p><i>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. Development and transport planning will be coordinated, to improve accessibility for the whole community and promote the use of sustainable modes of transport.</i></p> <p><i>The council will set out key infrastructure and facility requirements for new development in an Infrastructure Plan, 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, subject to viability assessment.</i></p> <p><i>Infrastructure that, on balance, provides benefits to the community and provides value for money will be promoted."</i></p>

Section	Comment(s)
	<p>There is also a mention of viability assessment in this policy. It is supported that viability should be taken into account when assessing developer contributions. An additional policy setting out when viability assessment will be undertaken and the process of this (for example using independent consultants and having the developer pay for this assessment) somewhere within the Local Plan would be helpful.</p> <p>It would also be helpful to clarify, perhaps in the accompanying text, whether or not 'infrastructure' in this policy includes green infrastructure.</p>
Tiverton - Policy S11	<p>Firstly it is recognised that the overall housing number for the district may change, and that the allocations in Tiverton may therefore also be subject to amendment.</p> <p>Similarly, employment allocations in Tiverton may need to be reconsidered in the light of comments made in the covering letter attached to this schedule about the general employment land allocation strategy.</p> <p>Importantly, in future iterations of the plan, this section of the plan should clarify how the actual numbers for Tiverton (housing and employment) have been arrived at.</p> <p>There is inconsistency between policies S11, S12 and S13 on how development allocations are shown. It would be helpful if these policies were set out using the same format.</p> <p>There is a reference in this policy to Tiverton developing in a 'balanced' way. This is potentially a confusing term, particularly as the majority of new development will be to the east of the town. In addition the following change is recommended to the following point:  b) recognise the importance of public transport journeys within the district, particularly Cullompton, as well to locations outside it.</p> <p>It is also suggested that the following point is added to the policy:  "F) enhance the public transport interchange function of the town" - this would reflect the 'market town strategy' on page 16 of the consultation document.</p>
Cullompton - Policy S12	<p>Firstly it is recognised that the overall housing number for the district may change, and that the allocations in Cullompton may therefore also be subject to amendment.</p> <p>Similarly, employment allocations in Cullompton may need to be reconsidered in the light of comments made in the covering letter attached to this schedule about the general employment land allocation strategy.</p>



Sector	Comment(s)
	<p>Importantly, in future iterations of the plan, this section of the plan should clarify how the actual numbers for Cullompton (housing and employment) have been arrived at.</p> <p>There is inconsistency between policies S11, S12 and S13 on how development allocations are shown. It would be helpful if these policies were set out using the same format.</p> <p>Furthermore, point a) from Policy S13 would also apply to Cullompton and similar wording could therefore be incorporated to S12.</p>
Cullompton para 2.52	<p>This paragraph relates to the need to regenerate Cullompton town centre. This is considered to be a key aim for Cullompton and the Local Plan should set out how this will be achieved through promotion of redevelopment / regeneration. Significant new housing would potentially bring in greater custom to the town, and this would generally be supported - subject to infrastructure provision, particularly the creation of sustainable transport links from new development to the town centre.</p>
Crediton	<p>Firstly it is recognised that the overall housing number for the district may change, and that the allocations in Crediton may therefore also be subject to amendment.</p> <p>Similarly, employment allocations in Crediton may need to be reconsidered in the light of comments made in the covering letter attached to this schedule about the general employment land allocation strategy.</p> <p>Importantly, in future iterations of the plan, this section of the plan should clarify how the actual numbers for Crediton (housing and employment) have been arrived at.</p> <p>There is inconsistency between policies S11, S12 and S13 on how development allocations are shown. It would be helpful if these policies were set out using the same format.</p> <p>The allocations in this policy do not seem to match those in S3, particularly under option 2.</p> <p>Bearing in mind the landscape restrictions in Crediton, as set out in para 2.62, the allocation under S3 option 1 may need to be reconsidered in terms of deliverability.</p>
Villages - Policy S14	<p>This policy refers to Willand. The policy should be clarified to reflect the potential for significant housing here if policy S3 option 2 (J27) is followed. This is reflected in para 2.69 but should be clarified in the policy.</p>
Paragraph 2.70	<p>Reference to the strategic road network would be better served with 'transport networks'.</p>
Policy S15	<p>It is considered that the wording of this policy could be clarified. It seems that the intention is to encourage various types of development, although this is not clear.</p>
Cullompton Policy	<p>This potential allocation relates to the potential for a new</p>

Section	Comment(s)
CU11	settlement to the east of Cullompton. The figure allocated in this policy is 60 dwellings greater than is proposed in Policy S3. This is not a significant amount bearing in mind the overall figure proposed, but the two policies should be consistent in future iterations of the plan.
Policy J27	As per the above comment relating to CU11, the figure allocated in this policy is 60 dwellings greater than is proposed in Policy S3. This is not a significant amount bearing in mind the overall figure proposed, but the two policies should be consistent in future iterations of the plan.
Specific allocations in the plan	In accordance with comments in the letter which accompanies this schedule, the county council will provide more detailed information about the allocations which are presented as part of an ongoing, iterative evidence base production process.

**Appendix II: Detailed schedule of comments on the Mid Devon Local Plan Review 'Options Consultation' Sustainability Appraisal**

It is recognised that sustainability appraisal (SA) is an iterative process. These comments relate to the framework of the SA, rather than its detailed findings.

Section of the Sustainability appraisal	Comment(s)
Biodiversity and Green Infrastructure	It is considered that geo-diversity should also be considered in this section of the SA. This should also therefore be considered in sustainability objective 'a'. For example geodiversity assets can be discovered and if so should be protected and made available for education and research purposes.
Presentation of assessment in appendices	A colour coding would be helpfully illustrate more clearly where negative and positive effects are likely to occur against the sustainability objectives.

