



Exeter
City Council

Local Plan Review
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
TIVERTON
EX16 6PP



Civic Centre, Paris Street, Exeter, EX1 1NN
www.exeter.gov.uk

Please ask for: RICHARD SHORT

Direct Dial:

Email:

Our ref: RPS/jw

Date: 20 March 2014

Dear Sir

MID DEVON LOCAL PLAN

Thank you for the opportunity to comment on the recent options consultation.

I attach a report that was considered by the Council's Planning Member Working Group on 4 March and Executive on 18 March. The proposed basis of a response was agreed by Executive.

The City Council is very concerned that the review is proceeding without an adequate evidence base and satisfying the duty to cooperate.

Mid Devon forms part of the functional housing market area and employment travel to work area for the Exeter sub region. There is a need to plan positively to meet objectively assessed needs over this area. Reviews of existing local plans should be informed by a sub regional study of the Exeter/Teignbridge/East Devon/Mid Devon area, to identify the appropriate scale of longer term growth and spatial options such as new settlements. The current Housing Market Assessment update should also form part of the evidence base.

Exeter City Council objects in the strongest possible terms to the proposal for commercial development at Junction 27 of the M5 Motorway, which includes major retail development and other uses. Proposals for such uses should be made in accordance with a sequential approach and following an assessment of impact. The proposal has been put forward for consultation without any retail assessment evidence base or prior discussion through the duty to cooperate. Such a scheme will have a major impact on existing town centres.

The City Council proposes that consideration be given, with the Environment Agency, to identifying a future consultation area to safeguard any long term potential for upstream flood storage on the River Exe to address the long term erosion of the protection of Exeter's flood defences by the uncertain impacts of climate change.

Please do not hesitate to contact me if you would like to discuss this representation.

Yours sincerely

RICHARD SHORT
ASSISTANT DIRECTOR CITY DEVELOPMENT

EXETER CITY COUNCIL

**PLANNING MEMBER WORKING GROUP
4 MARCH 2014**

**EXECUTIVE
18 MARCH 2014**

MID DEVON DISTRICT COUNCIL LOCAL PLAN

1 PURPOSE OF REPORT

- 1.1 This report has been prepared to inform Members of the strategic options for development contained in the emerging review of the Mid Devon Local Plan, being prepared by Mid Devon District Council, and to agree the basis of a proposed response.

2 BACKGROUND

- 2.1 Mid Devon District Council (MDDC) is preparing a new Local Plan for Mid Devon, to replace its existing Core Strategy (adopted in 2007), Site Allocations and Infrastructure Development Plan Document (adopted in 2010) and Development Management Policies (adopted in 2013).
- 2.2 MDDC is working to the following tight timescale:
- Initial Options consultation – January/March 2014
 - Local Plan submitted to Secretary of State – September 2014
 - Examination – January/February 2015
 - Adoption of the Local Plan – May 2015

3 ISSUES AND OPTIONS

- 3.1 The initial consultation closes on 24 March 2014. ECC will have further opportunities to influence the plan through the statutory Duty to Cooperate.

Spatial Strategy

- 3.2 The Council has identified two strategic policy options for how development might be distributed around the district. Both options currently seek to deliver approximately 8,400 dwellings and 154,000 square metres of commercial floor space between 1 April 2013 and 31 March 2033. Only one of the options will be taken forward to the final draft of the Local Plan.
- 3.3 Option 1 proposes to concentrate development at Tiverton, Cullompton and Crediton, to a scale appropriate to their individual infrastructures, economies, characters and constraints. Development targets for option 1 are set out in the table below:

Location	Residential (dwellings)	Commercial (sq metres)
Tiverton	3,600	49,000
Cullompton	2,400	46,700
Crediton	800	5,300
Rural areas	1,600	53,000
Total	8,400	154,000



- 3.4 Option 2 proposes that residential development of up to 5,460 dwellings from 1 April 2013 would be concentrated in the aforementioned three main towns. Later in the plan period, strategic residential growth of approximately 2,940 dwellings would be directed to a new community located either adjacent to Junction 27 of the M5, or adjacent to Junction 28 as an expansion to Cullompton. Residential development of the new community would not commence before April 2026 or the completion of the 5,460 dwellings elsewhere, whichever is the sooner.
- 3.5 The option to site the new mixed use community adjacent to Cullompton/Junction 28 has been put forward by Cullompton Town Council, but currently has no developer backing.
- 3.6 Development targets for Option 2 are set out in the table below:

Location	Residential (dwellings)	Commercial (sq metres)
Tiverton	2,340	31,800
Cullompton	1,560	30,400
Crediton	520	3,400
Rural areas	1,040	34,400
M5 J27 (Willand) or J28 (Cullompton)	2,940	54,000
Total	8,400	154,000

- 3.7 The option of a new community is proposed on the basis that, later in the plan period, it will become problematic to continue focusing the majority of development in the three main towns due to land availability and environmental constraints.
- 3.8 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 scheme being promoted covers an area of approximately 96 ha for mixed commercial development including:
- 25 ha (600,000-900,000sq ft floorspace) for B1-B8 employment uses;
 - 8 ha (200,000sq ft floorspace) for a designer retail outlet/village;
 - 3.3 ha (90,000sq ft floorspace) for a sports and activity centre including associated retail;
 - 13 ha for a water-based outdoor leisure destination;
 - 4.5 ha (125,000sq ft floorspace) for a Devon produce promotion centre;
 - 3.4 ha for motor vehicle dealerships;
 - 0.8ha (21,000sq ft) for a regional visitors centre;
 - 1.8 ha for a 100-500 room hotel, conference venue/theatre and concert hall;
 - 3 ha (50,000sq ft) for a garden centre;
 - 2.4 ha (50,000sq ft) for an 8-10 screen cinema; and
 - 1.9 ha for a motorway service area.

Extracts from a summary leaflet on the options consultation are attached at Appendix 1.

4 ISSUES

- 4.1 MDDC appears to have undertaken this options consultation in advance of publication of important evidence that should inform the strategy. For example, the housing strategy is just based on existing levels of development plus a notional 20%. The Plan should be informed by three pieces of work:
- i) It is desirable that ECC, EDDC, TDC, MDDC and DCC agree some form of sub regional study identifying the development needs of the sub region beyond existing plans periods to 2026 in Exeter and Mid Devon's case. This study would be available by the Autumn and would enable more informed decisions on the spatial strategy for the sub region including the role of future new settlements.
 - ii) These same authorities which constitute a single housing market area, have commissioned a revised housing market assessment to update the last one agreed in 2010. This is due to be published in the next few weeks.
 - iii) The proposed retail development at Junction 27 will have potentially significant adverse effects on existing town and city centres. This is outlined below.

5 RETAIL ISSUES

- 5.1 The proposal includes is for a 200,000sq feet designer outlet village plus other retail elements including a food festival site of up to 125,000sq ft, a 50,000sq ft garden centre, unspecified amount of 'activity retail' and an 8-10 screen cinema.
- 5.2 The consultation by Mid Devon closes on 24 March, however, the retail assessment which will provide the evidence base on the impact of the proposal has not yet been published. In the absence of the retail assessment one can only speculate on the impact of this proposal on existing town centres. Research by FSP Retail in 2012 suggests that UK outlet centres have an average turnover of about £280sq ft per annum. This would suggest the proposed outlet centre alone would have a comparisons goods turnover of about £56m per annum, if it performed at the turnover per square foot of some of the better performing outlet centres such as Cheshire Oaks or Bicester, turnover might reach £80 or £100m per annum.
- 5.3 The question is where is all this trade going to come from? The transport scoping report suggests that most trips are going to come from the four districts of Mid Devon, East Devon, Taunton Deane and Exeter. The recent retail assessment undertaken for a proposal in Exeter provides some data of the comparison goods turnover of town centres:-

Exeter	-	£400m
Taunton	-	£280m
Tiverton	-	£68m
Honiton	-	£24m
Crediton	-	£18m
Wellington	-	£4m
Cullompton	-	£5m

- 5.4 While a small element the outlet centre's turnover will be passing trade from long distance trips on the M5 motorway, diversion from other out of centre shopping developments and any future growth in per capita comparison shopping expenditure, a significant part will be diversion from town and city centres which will also face the continued growth of online shopping. This loss of trade may significantly affect their vitality and viability. The Online Planning Practice Guidance states 'in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.'

6 RIVER EXE FLOOD STORAGE

- 6.1 Members will be aware that at an early stage of consideration of options for an updated River Exe Flood Prevention Scheme, consideration was given to upstream flood storage. This option was rejected for reasons that included the significantly higher costs than the proposals that are currently being implemented. The current proposals will provide 1 in 100 year event flood protection however climate change will gradually erode that level of protection over time. The rate at which the level of protection reduces will depend on the pace of climate change. It may be appropriate for MDDC and the Environment Agency to consider identifying a flood storage consultation area in the new plan, within which MDDC would consult the EA on any future planning application, to allow consideration of whether approval might prejudice the long term creation of any flood storage area.

7 PROPOSED RESPONSE

- 7.1 It is proposed to respond on the following basis:-

Exeter City Council:

- i) Considers that the next "submitted" version of the Plan should be informed by a sub regional study of longer term development needs and options for the Exeter area and an updated housing market assessment.
- ii) In the absence of this evidence base, is unable to comment on the appropriateness of the proposed level of housing and employment development or the two distribution options.
- iii) Expresses strong concerns that the development proposed involving major retail and leisure development at Junction 27 of the M5 motorway, has been put forward for consultation without a full retail assessment being available and is concerned that this scale of development is likely to have major impacts on the vitality and viability of existing towns and city centres in the sub region and represents an unsustainable, car dominated development strategy.

8 ADVICE SOUGHT/RECOMMENDATION

- 8.1 Planning Member Working Group is asked to support a representation to the Mid Devon Local Plan.
- 8.2 Executive is asked to agree a response based upon the issues raised in paragraphs 4.1 and 6.1 and any other issues considered appropriate by the Portfolio Holder City Development.

RICHARD SHORT
ASSISTANT DIRECTOR CITY DEVELOPMENT

Local Government (Access to Information) Act 1985 (as amended)
Background papers used in compiling this report:
None



Local Plan Review Options Consultation Summary

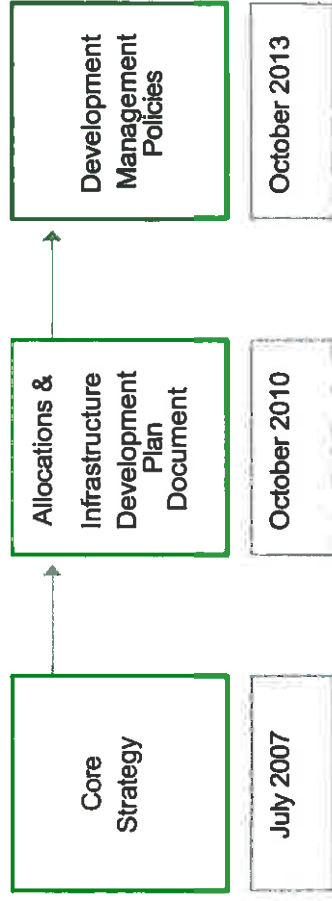
January 2014



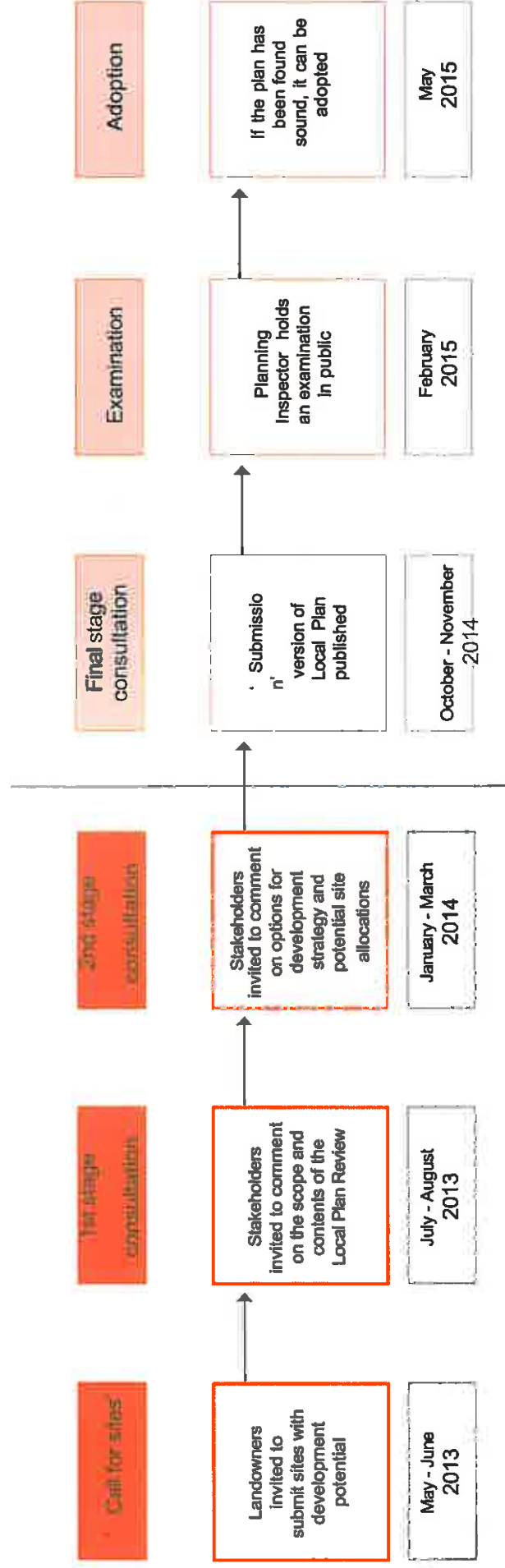
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Mid Devon Adopted Local Plan



Local Plan Review



Introduction

The Mid Devon Local Plan currently includes:

- Core Strategy 2006-2026 (adopted 2007)
- Allocations and Infrastructure Development Plan Document (adopted 2010)
- Development Management Policies (adopted 2013).

The Local Plan Review will supersede these and will be an up-to-date plan based on the latest evidence and Government guidance. The Council aims to adopt the new Local Plan by May 2015.

The options consultation for the Local Plan Review is the second stage of consultation, the first having taken place in July-August 2013. Following that initial consultation on the scope and broad options for development strategy in Mid Devon, the Council has produced more detailed options for the direction of development and site allocations. This summary draws out the key points from the options document.



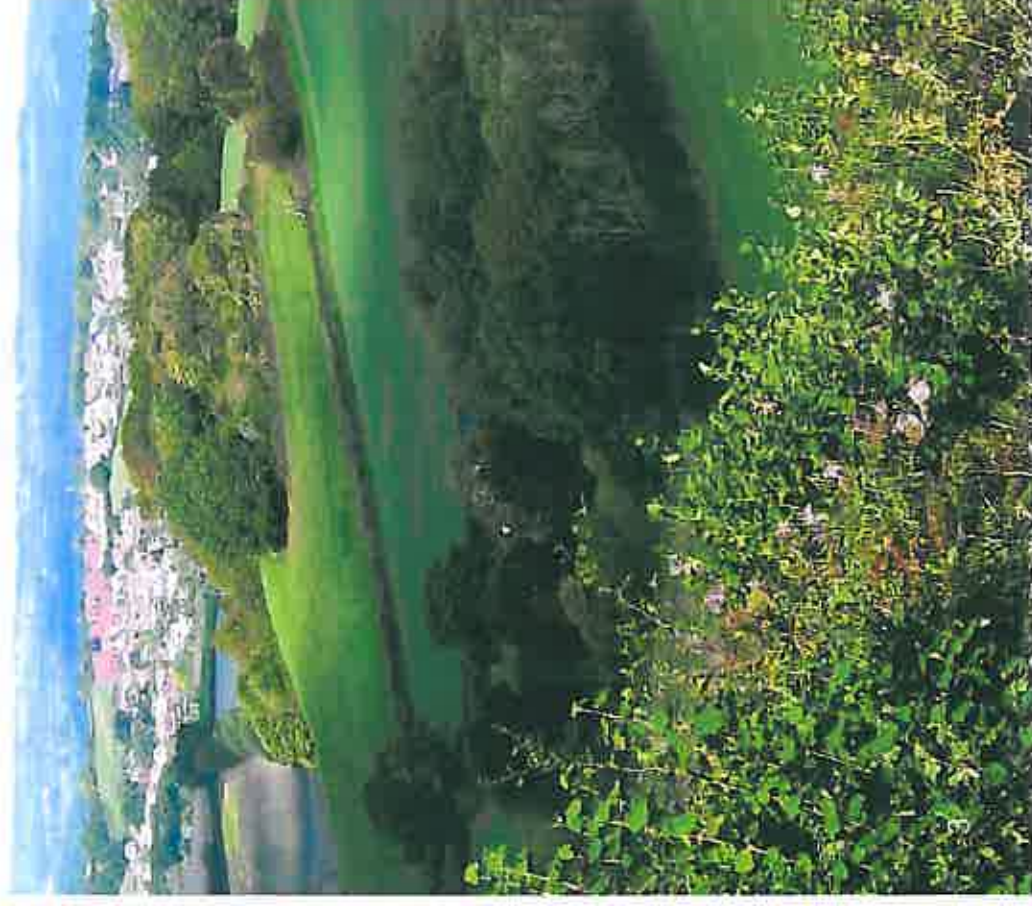
Recent consultation event about a site allocated in the existing Local Plan

Mid Devon Context

The population of Mid Devon has grown at a faster rate over the past 20 years than England, the South West or Devon. The 2011 Census shows that Mid Devon's population rose by 11% since 2001 from 69,900 to 77,500. This trend is expected to continue with Devon County Council population projections showing a further 15% increase between 2011 and 2031. The Council must plan to meet the needs of a growing and changing population over the timescale of the new Local Plan.

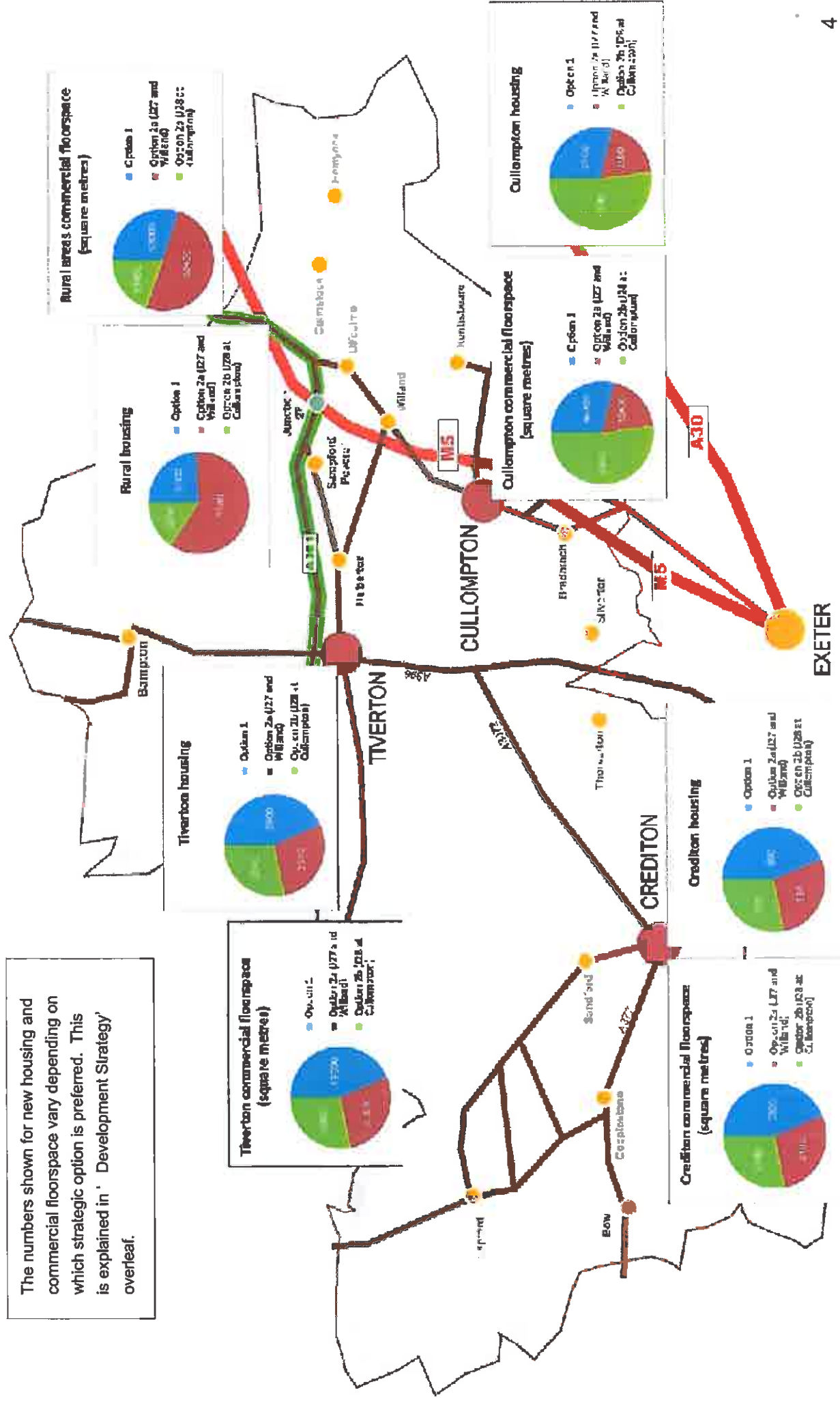
The vision and spatial strategy which underlie the whole plan essentially seek to protect Mid Devon's environment from the adverse effects of development whilst ensuring that the needs for housing, employment, recreation and services are met.

The new Local Plan has to be prepared in accordance with the Government's National Planning Policy Framework and also has to be subject to a Sustainability Appraisal.



The Options for distribution of development around Mid Devon

The numbers shown for new housing and commercial floorspace vary depending on which strategic option is preferred. This is explained in 'Development Strategy' overleaf.



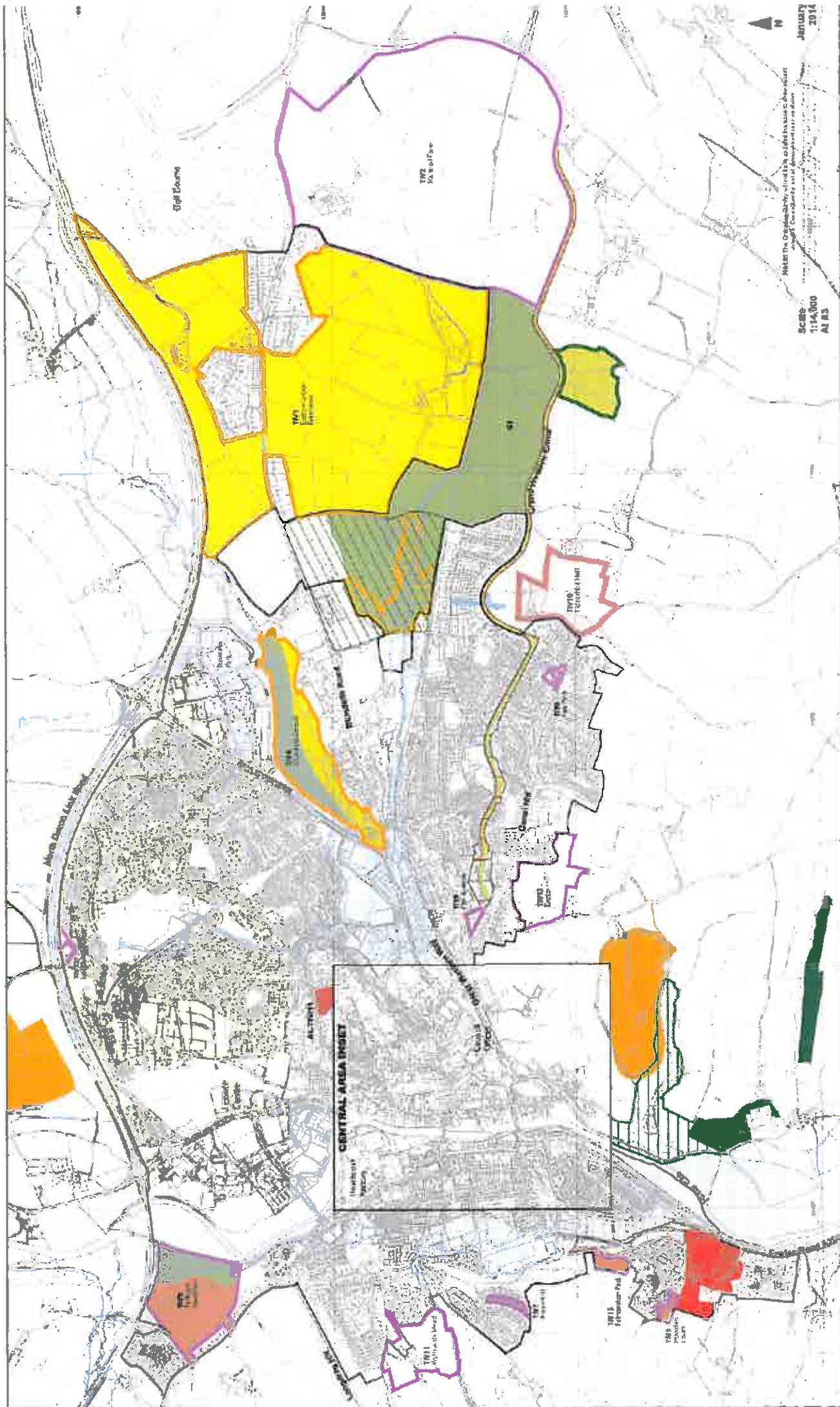
Development Strategy

The options document includes 14 draft policies on development strategy, setting out the overarching principles that should guide development. Policy areas include affordable housing, the provision of gypsy and traveller sites, protection of the town centres, securing public open space and protection of the environment. The list of villages suitable for limited development has been revised to include Bampton and Holcombe Rogus, while Burlescombe and Westleigh are proposed to be removed from the list.

There is an estimated requirement of 8,400 dwellings and 154,000 metres of commercial floorspace to meet the needs of the district up to 2033. The options document provides more detail about how these figures have been reached. The targets for housing development in the final version of the Local Plan will be adjusted to take account of a new Strategic Housing Market Assessment, which is currently being prepared.

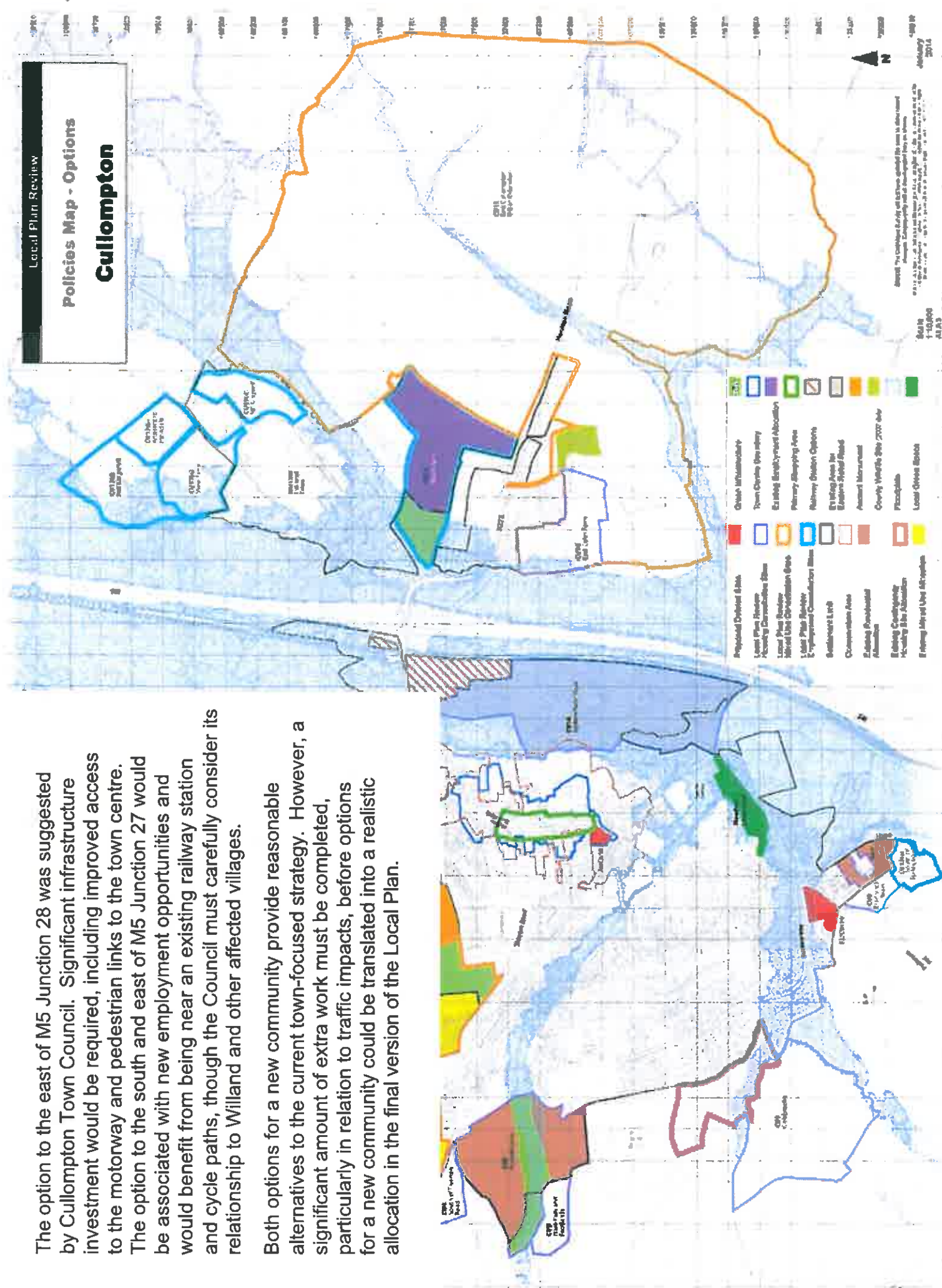
There are two strategic options for the direction of future housing and employment growth in Mid Devon. The first option is to continue focusing most development in the three main towns, with the largest land allocations in Tiverton. The second option is to direct long-term growth to a new community to the east of Junction 27 or Junction 28 of the M5 Motorway. Housing development under this option would not be expected to occur until later in the plan period, post-2026.

The option of a new community is being considered because the towns of Crediton and Tiverton are constrained by their surrounding geography, and sites well related to the main towns are becoming increasingly difficult to find.



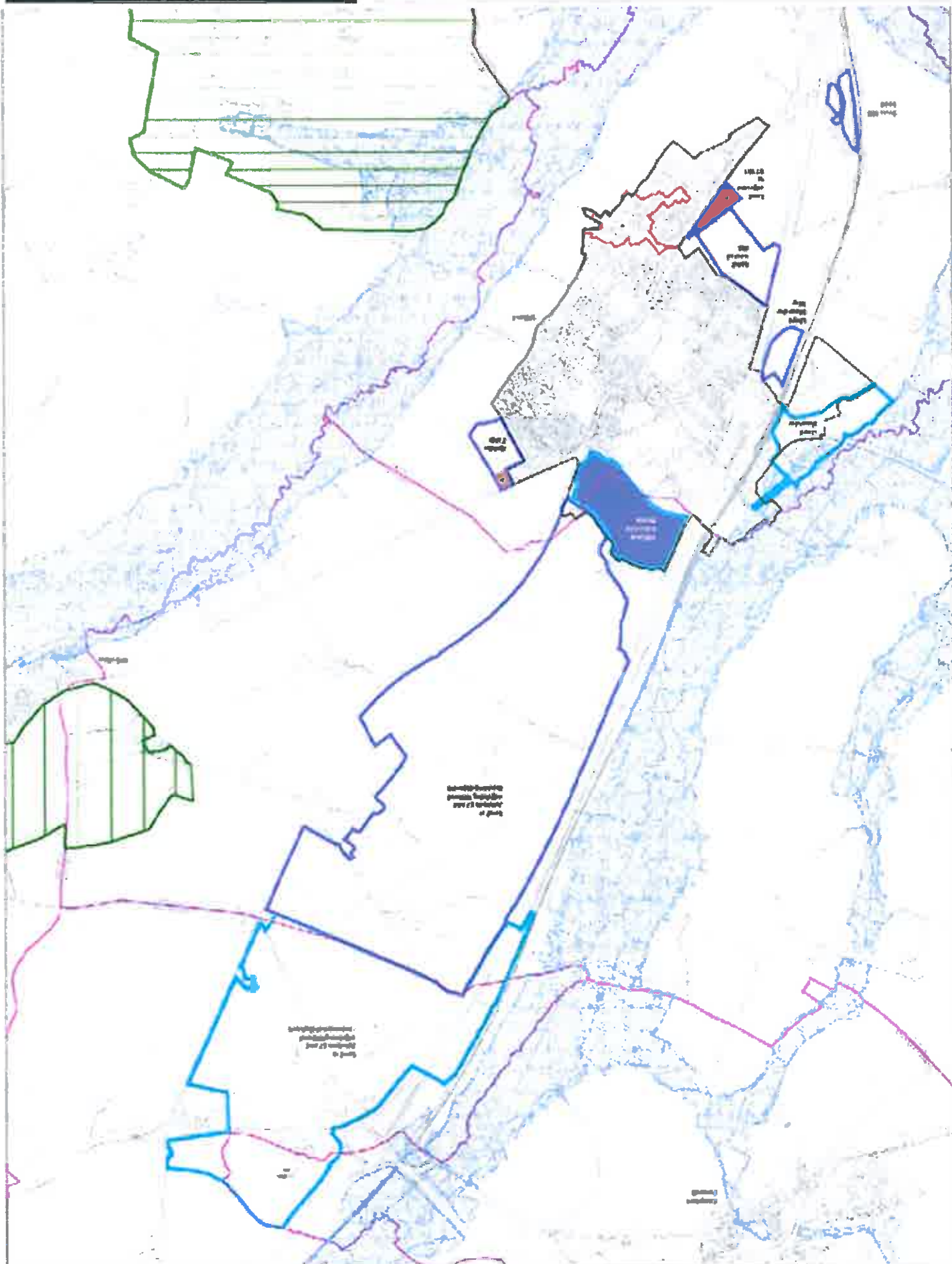
The option to the east of M5 Junction 28 was suggested by Cullompton Town Council. Significant infrastructure investment would be required, including improved access to the motorway and pedestrian links to the town centre. The option to the south and east of M5 Junction 27 would be associated with new employment opportunities and would benefit from being near an existing railway station and cycle paths, though the Council must carefully consider its relationship to Willand and other affected villages.

Both options for a new community provide reasonable alternatives to the current town-focused strategy. However, a significant amount of extra work must be completed, particularly in relation to traffic impacts, before options for a new community could be translated into a realistic allocation in the final version of the Local Plan.



Policies Map - Options
Willand / Junction 27

LOCAL PLAN REVIEW



 Point Boundary
 Existing Abutments
 Extension Area
 Permanent IWB

Creating the program: A
 local register of
 1,000 1/2-ton and 1-ton
 1/2-ton trucks and trailers

FOULBAM
***and from Foulmer - leading**
Cartersville, Ga.
Or Foulmer - leading
Or Foulmer - leading

Site Allocations

This section of the plan contains the potential sites which could be allocated in and around Mid Devon to meet the district's housing and commercial land requirements. These sites have been confirmed as deliverable but are only options at this stage. All potential allocations have been included to allow the Council fully to consider the opinions of residents and other stakeholders before defining proposed allocations.

The potential development sites exceed the amount of land and development that are likely to be required. However, the final version of the plan will tailor land supply to meet the latest evidence of housing need and demand to 2033, currently being assessed through the Strategic Housing Market Assessment.

The distribution of site allocations will depend on which strategic option is pursued:

1. to direct the majority of development according to the current hierarchy of towns (Tiverton, Cullompton, Crediton)
2. later in the plan period (post-2026) to meet long-term development needs through a new community at J27 (adjacent to Willand) or J28 (East Cullompton)

Potential sites for Tiverton include land at Hartnoll Farm. No other available sites of equal capacity have been identified around Tiverton. Within the town centre potential redevelopment sites have been identified at Phoenix Lane and William Street/Bampton Street.

The existing allocation for the North West Cullompton urban extension is proposed to be retained, and other housing options around the town are also being considered, including a significant expansion of the urban extension at Growen Farm. A new site is also suggested for the potential railway station in Cullompton.

Cullompton Town Council is in the early stages of producing a neighbourhood plan. Some sites in Cullompton may be excluded from the Local Plan Review at a later stage if they are going to be allocated through a neighbourhood plan instead.

For Crediton a limited range of new housing sites around the town and some commercial sites to the south east of the town have been identified, but the topography of Crediton limits the amount of development that could be accommodated without significant landscape and visual impacts.

A large number of potential housing sites have been put forward in rural areas but their capacity far exceeds the contribution that rural areas would need to make to meet Mid Devon's housing need. A few rural communities have expressed a wish to see land allocated for housing and such requests will be taken into account when decisions about preferred sites are being made later this year.

