

Duty to Cooperate Statement



March 2017

**Submission of Mid Devon Local Plan Review
2013 – 2033**

Introduction

The Duty to Cooperate is set out in Section 33A of the Planning and Compulsory Purchase Act 2004, inserted by the Localism Act 2011 and enacted on 15 November 2011. The Planning Inspector must consider whether the Council has complied with the Duty to Cooperate, which requires that the Council engages constructively, actively and on an ongoing basis with other local authorities and certain prescribed organisations in relation to strategic matters when preparing local plans. Strategic matters are development of land and provision of infrastructure with a significant impact on at least two planning areas. This paper sets out how this duty has been met by Mid Devon District Council in preparing the Mid Devon Local Plan Review 2013 – 2033.

The NPPF reflects this duty, stating that plans should be based on co-operation between neighbouring authorities. In particular, (NPPF #181):

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”

Further guidance can be found in the National Planning Practice Guidance, which makes the following points:

- The duty is not a duty to agree, but every effort should be made to do so.
- Cooperation should produce effective policies on strategic cross-boundary issues.
- Robust evidence should be provided of who the council has cooperated with, the nature and timing of cooperation and the outcomes.

The approach of the paper is to set out the areas of agreement between Mid Devon and the various organisations and the broad approach to the process, but not to provide exhaustive lists of meetings at which such matters were discussed. However by way of summary a selection of such meetings that have taken place is attached at Appendix A. The paper indicates that there is broad agreement that the duty to cooperate has been satisfactorily met in relation to the Mid Devon Local Plan Review 2013 - 2033.

The planning authorities in Devon have prepared and signed a Duty to Cooperate protocol, setting out future steps to ensure that strategic issues are dealt with appropriately in the light of the duty. Mid Devon has approved the protocol. This can be read on the Devon CC website here:

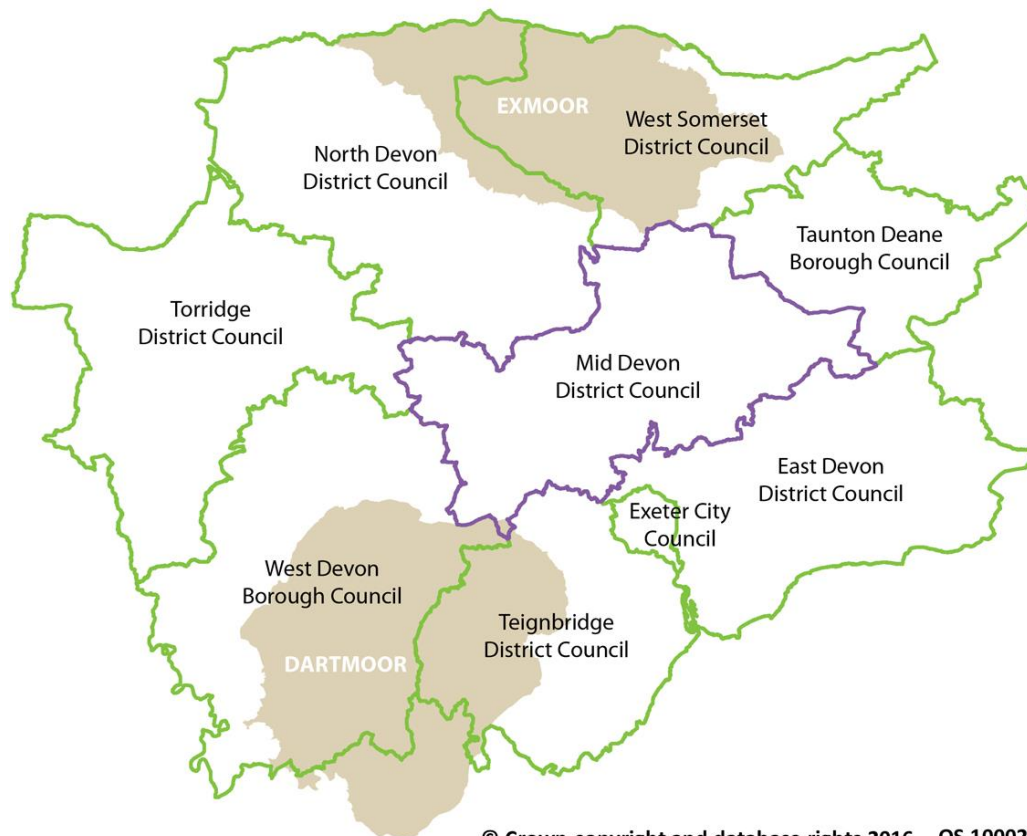
http://www.devon.gov.uk/duty_to_cooperate_protocol.pdf

This statement has taken this into account as appropriate.

At time of submission we have received endorsement from the majority of our duty to co-operate partners on this statement. We are liaising with those outstanding with the aim of gaining an endorsement response from them as soon as possible. Some partners have suggested factual changes to this statement which have been incorporated into the document. The latest position is that no partners to date consider that Mid Devon District Council has not cooperated. Whilst some earlier representations raised issues over the extent of cooperation, the Council has now received confirmation from those partners that they now consider cooperation to have taken place. Separate to the duty to cooperate process, partners reserved their right to safeguard their position over aspects of plan content in respect of particular issues raised within their local plan representations.

Mid Devon

The local planning authority of Mid Devon covers the central and eastern parts of the county. To the north east and east lie the districts of West Somerset and Taunton Deane respectively, both within the County of Somerset. Carrying on in a clockwise direction are borders with the districts of East Devon, Teignbridge, West Devon, Torridge and North Devon. Dartmoor National Park and Exmoor National Park also adjoin the planning authority, to the south and north respectively (including a very small overlap between Dartmoor and Mid Devon District). The City of Exeter does not adjoin Mid Devon but is less than 1km from the district's southern boundary at its closest point. Mid Devon is within Devon County Council's administrative area.



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Duty to Cooperate Meetings

During the preparation of the Local Plan Review, Mid Devon hosted a number of “Duty to Cooperate Meetings” with adjoining and nearby Local Planning Authorities and other duty to cooperate bodies such as Natural England, Highways England and the Environment Agency. These meetings encouraged an open discussion with our duty to cooperate partners over any issues of concern or interest to them. The meetings were held frequently throughout the whole local plan process. In recognition of the value of ongoing discussions with these contacts it is Mid Devon’s intention to continue with liaison meetings throughout the delivery of the plan. At the early meetings it was established that a main ongoing focus for future duty to cooperate meetings would be the potential allocation of a leisure/retail use at Junction 27 of the M5, which is covered in the Economy, Retail and Leisure section of this statement. On 22 September 2016 Mid Devon District Council resolved to include a proposed allocation at Junction 27 of the M5 Motorway for leisure, retail and tourism development. Additional meetings with duty to co-operate partners were held prior to the Council meeting and more have been held since.

Representations from Duty to Cooperate Partners

The various comments received from Duty to Cooperate partners have been considered carefully during the preparation of the local plan and acted on where appropriate. These are reflected in the various sections of this report.

Housing

Mid Devon is within the Exeter Housing Market Area (EHMA) along with East Devon, Exeter and Teignbridge. Dartmoor, which is its own local planning authority, includes a large area of Teignbridge district and a small area of Mid Devon district, and both of these parts of Dartmoor are within the EHMA. The five local planning authorities jointly commissioned a Strategic Housing Market Assessment (SHMA) from ORS (Opinion Research Services) which was published in 2007, and which also included evidence relating to the adjoining Torbay Housing Market Area. Individual authorities have commissioned updates of this SHMA from ORS, although Mid Devon has not required such an update.

The EHMA planning authorities, in association with Devon County Council, commissioned and published a new SHMA for the area, from David Couttie Associates. The final SHMA was published in 2015. This new SHMA has taken account of the revised national guidance on preparing a SHMA, contained within the Planning Practice Guidance, which recommends against the use of primary sources such as residents' surveys, and introduces a number of other changes to the requirements. The SHMA was published in 2015 and sets out the Objectively Assessed Need for additional housing across the Housing Market Area and within each of the constituent Local Planning Authorities.

For Mid Devon, the work indicates a housing need of 343 – 400 dwellings per year (i.e. 6,860 – 8,000 dwellings in total) depending on the basis for the assessment. These are summarised below:

Updated projections:

Annual Need	Total Need	Basis
343	6860	Jobs-based projection* with 2011-based household formation
361	7220	Demographic projection with 2011 – based household formation.
382	7640	Jobs-based projection* with 2008-based household formation
400	8,000	Demographic projection with 2008 – based household formation.

*Mean of two jobs-based projections

The Mid Devon Local Plan Review submission version, incorporating Proposed Modifications (January 2017) sets a housing target of 393 dwellings per year which is at the upper end of this range. The Plan allocates land sufficient to provide nearly 10% more housing than this requirement, and also does not count windfall dwellings in its housing figures. Therefore, it can be seen that Mid Devon is not seeking help from adjoining authorities to meet the housing need arising within the district. There have been no requests from other authorities for Mid Devon to provide any of their need either. Accordingly no issues arise in relation to overall housing provision in relation to the duty to cooperate.

To provide further support for this conclusion, an analysis has been made of the overall planned provision within the Exeter Housing Market Area which indicates that the emerging and adopted local plans of the various authorities are at the upper end of the needs assessments for the EHMA and therefore that sufficient provision has been made for housing within a strategic context.

For the Exeter Housing Market as a whole, the housing need options are as follows (covering the period 2013 – 2033, but given as an annual average):

Annual Need	Basis
2,058	Demographic projection with 2011 – based household formation. (SHMA Table 10-2)
2,286	Demographic projection with 2008 – based household formation. (SHMA Table 10-1)
2,387	Mid-point of OAN Range. (SHMA Table 10-3)
2,403	Jobs-based projection* with 2011-based household formation (SHMA Table 10-2)
2,647	Jobs-based projection* with 2008-based household formation (SHMA Table 10-1)

*Mean of Experian and Ekosgen jobs-based projections

The most recent (at March 2017) DCLG Household Projections are the 2014 based projections, published in 2016. An assessment of the latest household rates (2014) data by Devon County Council indicates that there is no significant change to Mid Devon's housing requirement. It will be noted that the 2014 based Household Projections are 406 fewer households, lower than the previous DCLG Household Projections (2013 based, published 2015). The SHMA considered a range of demographic projections including 2008 and 2011 based figures and longer term

migration trends (using Popgroup modelling by DCC). The SHMA therefore provides a more rounded assessment of objectively assessed need than taking the 2014 based household projections in isolation.

Importantly we do not envisage any necessity to meet forecasted need outside our plan area.

The various local plans adopted or emerging in the EHMA provide for the following levels of housing provision (taking account of housing completions and commitments). These are given on an annual basis to allow for comparison, given the differing end-dates of the local plans under consideration. The calculations for these are set out in Appendix C.

Local Planning Authority	Annual Housing Provision
Dartmoor (part)	25
East Devon	1013
Exeter	600
Mid Devon	432
Teignbridge	655
Total Exeter Housing Market Area	2,625

The overall annual provision across the Exeter HMA exceeds the mid-range by about 10%, and comparable with the highest projection (2008). This indicates significant flexibility against the SHMA requirements for the Housing Market Area as a whole.

The Councils of Devon, Exeter and East Devon expressed the view at the time of the 2014 Issues and Options Report that the Mid Devon Local Plan should await further work on the Exeter Strategic Housing Market Assessment (which was then in the process of being produced) and subsequent discussions concerning an overall strategy for the HMA area. However, there was no progress on the preparation of such a strategy, and work on separate plans by East Devon and Exeter continued, also in the absence of an overarching strategy. There is no requirement to produce a strategy to implement the duty to cooperate, and representations from those organisations on the 2015 proposed submission plan do not reiterate those concerns. The preceding paragraphs indicate that housing need has been met across the HMA in the absence of a formal agreement on distribution, guided by the jointly prepared SHMA.

An Issues Consultation on the emerging Greater Exeter Strategic Plan (GESP) took place between 27 February and 10 April 2017, which was jointly prepared by the EHMA authorities. Whilst the GESP's plan period runs to 2040, it dovetails with the Local Plan Review.

The local planning authorities in the EHMA have also taken a consistent approach to the preparation of their Strategic Housing Land Availability Assessment, with a common methodology agreed between the authorities. The original methodology was agreed in 2008 and was recently updated.

North Devon, Torridge and West Somerset are part of the Northern Peninsula Housing Market Area (which includes Exmoor), whilst West Devon (including a part of Dartmoor) is within the Plymouth Housing Market Area. Separate cooperation procedures with other local planning authorities operate within these areas. Similarly Taunton Deane and West Somerset are within the Taunton Housing Market Area, together with the adjoining district of Sedgemoor (West Somerset is within two overlapping HMAs). While these Housing Market Areas have borders with Mid Devon and therefore there are likely to be some flows of commuters/housebuyers across these borders, there is not considered to be any significant cross-boundary strategic housing issues arising with these areas. In particular, there are no proposals to meet Mid Devon's housing needs within these other Housing Market Areas, nor for needs arising in those areas to be met within Mid Devon. The relevance of the Exeter HMA is confirmed by the recent publication of the revised Exeter Travel to Work Area with which it is a very good fit.

Specific work has been undertaken on the need for Gypsy and Traveller pitches, with RRR Consultants undertaking an assessment for the period 2014 – 2034 which covers the local planning authorities of Dartmoor, East Devon, Exeter, Exmoor, Mid Devon, North Devon, Torridge and Torbay. This need can be met by allocations within the emerging Mid Devon Local Plan Review and from expected windfall sites. Again, Mid Devon will meet its full need, with no requirement for other local planning authorities to help with this.

Economy, Retail and Leisure

The economic strategy within the Local Plan is based on meeting the objectively assessed needs for economic and retail development as set out in the Employment Land and Retail Reviews prepared for the Council. Therefore the plan does not raise any significant matters of cross-boundary concern in terms of looking to neighbouring authorities to meet the District's need. However there have been concerns raised by partners regarding the potential for the District to meet retail needs beyond the district boundary.

During the preparation of the Local Plan it became clear that proposals for a major leisure/tourism/retail proposal close to Junction 27 of the M5 would be promoted by the landowners and developer interests. The option was considered in the Council's

Local Plan Review Options Consultation (January 2014), with objections from Taunton Deane, Exeter, North Devon and East Devon. At the Duty to Cooperate meetings referred to above, many of the adjoining and nearby local planning authorities continued to express concerns about the potential impacts on their town and city centres arising from a major proposal in this location. As a result the promoters of the scheme were asked to prepare reports to consider the appropriateness of the proposals against the “town centre first” policies of the NPPF. The Council appointed GVA to consider these assessments. When the Council considered the information in these reports in December 2014 it decided not to pursue an allocation at J27 at that time and resolved to exclude proposals from the Local Plan Review February 2015 Proposed Submission Consultation document. The Council considered at that time that the quantitative need for the proposed retail element of the development had not been demonstrated, the proposal had not adequately addressed sequential test requirements set out in the NPPF and that the potential impacts on the roles and functions of existing centres and other development plan proposals elsewhere had not been fully addressed.

Since the Council considered whether to allocate land at J27 for commercial purposes in December 2014 the promoters submitted their representation to the Local Plan (April 2015). This representation, which promoted a commercial allocation, sought to address the Council’s previously identified concerns. The scheme put forward in the promoters’ local plan representation removed some of the previously proposed town centre uses and other uses listed in the options policy such as, the cinema, the conference centre and concert hall and the garden centre.

The evidence submitted by the promoters as part of their representation considered the need for the individual components having regard to the availability of spending capacity/demand within the catchment area. In each case their report suggested that there is both significant headroom within these sectors, and/or a gap in the type of provision that an allocation at J27 would provide. Their report suggested that it would have limited impact on town and retail centres.

Mid Devon District Council sought independent analysis of the submitted evidence of the retail proposals. The Council employed Nathaniel Lichfield and Partners (NLP). NLP’s first report (July 2015) on the submitted representation concluded that:- *the proposal comes as a package, and the tourism components are largely financially dependent on the retail and hotel elements, and that as a local plan allocation, it is the duty of the Council to assess the need for the development and undertake a sequential test of site selection.* Further work was subsequently commissioned and covered within NLP’s second report (March 2016). This considered the impact on nearby towns and the commitments and proposals of development plans elsewhere. This report concluded, whilst there was no local need in Mid Devon for the retail space proposed, there was a regional need for additional retail floor space. The report concluded Mid Devon could provide for that need providing it did not put at risk development commitments elsewhere or significantly impact the viability or vitality of neighbouring towns. NLP’s evidence based assessment established that there was no unacceptable impact demonstrated and no developments or

commitments were likely to be put at risk. NLP considered that a J27 allocation was sound if MDDC wanted to cater for the undersupply in regional need.

Exeter City Council and North Devon District Council questioned these findings during general liaison updates and duty to co-operate meetings. The key retail issues raised were as follows:

1 The Pre-publication Draft Exeter and West End of East Devon Retail and Leisure Study (EWEDRLS) prepared by GVA contained more recent information, in particular regarding comparison goods expenditure growth levels.

2 There were concerns over the reliance placed on long term projections, and that a cautious approach should be employed.

3 There was concern that there was no quantitative need for the DOV comparison floorspace, over and above other allocations within Mid Devon, based on local expenditure generated within the District. This suggests the scale of DOV proposed will result in unsustainable planning and an overprovision of retail floorspace, causing an adverse impact on the vitality and viability of existing centres.

4 That consideration had not been given to all current commitments in Exeter and other neighbouring authorities, i.e. in Exeter's case the Ikea store, the Bus and Coach Station scheme and the outstanding Moor Exchange Scheme (up to an additional 16,288 sq.m floorspace of which 11,102 sq.m is A1).

5 In terms of the sequential approach and disaggregation, can the proposals be located within town centres within the wider catchment area, including separate components of the proposals?

As a result of these authorities' concerns raised Mid Devon District Council commissioned NLP to specifically consider the concerns outlined above. NLP reconsidered these issues and concluded that 'there is no need to amend NLP's previous advice relating to the sequential approach or retail impact'. NLP confirmed regional headroom was available, Mid Devon could provide for it if they wished and no significant risk to vitality and viability of nearby towns would arise. Notwithstanding this Exeter City Council, Taunton Deane Borough Council and North Devon District Council have continued to raise objections through the local plan process.

A minor cross boundary issue raised by Exmoor National Park Authority, concerning a description of the social/economic role of Tiverton, has been reflected in the submitted plan.

Transport

Devon County Council has provided Mid Devon District Council with transport specialist advice in the preparation of the Local Plan Review. This has included providing highway comments on potential allocation sites, including within the

SHLAA process, and more strategic considerations such as railway and major road improvements.

The Great Western Main Line railway runs through Mid Devon, entering from Taunton Deane in the east and leaving into East Devon in the south, from which it links to Exeter and beyond. There is currently only one station on that line within Mid Devon; at Tiverton Parkway. The Council has, over a long period of time, been working with Network Rail, Devon County Council and Taunton Deane Borough Council on proposals for a new railway station at Cullompton, as part of the Devon Metro Scheme, supported by an additional station at Wellington within Taunton Deane. This proposal is referred to within the Network Rail Western Route Study. The Council will continue to work on this with our partners and has included an appropriate policy within the Local Plan Review. Also with respect to the Tarka Branch Line, the Council has had engagement through the Tarka Line forum. This has included ongoing engagement with NDC, DCC, Exeter CC and the rail industry relating to the frequency and speed of services.

The M5 runs along a similar route to the mainline railway through the eastern half of the district, although diverging as they exit the southern border. The two motorway junctions within Mid Devon require improvement in order to manage development levels at Tiverton and, particularly, at Cullompton. Interim improvements to Junction 27 have already been completed but Highways England consider that further improvement is likely to be required in order to accommodate the growth set out in the Local Plan. These recent improvements ensure the junction operates throughout the year, even in peak times. However, it is close to capacity during peak periods. The junction is capable of being improved but the precise nature of these improvements are currently the subject of ongoing discussions between Highways England, Devon County Council, Mid Devon District Council and the current promoters of land at J27.

In relation to Junction 28, improvements were implemented in summer 2015, again agreed with those authorities. However the junction still currently suffers from significant congestion during peak periods. DCC has undertaken an assessment of the impacts of the proposed new development in terms of access onto the M5, and its conclusions were set out in the report that had previously been prepared for the District Council in August 2014. The assessment concluded that the preferred option for mitigating the impact of development would be the creation of a new junction onto the M5 to the south of Junction 28, north of the existing local overbridge. This scheme would require the construction of a new overbridge and south facing slip roads onto the M5. The new junction would connect to roads within the East of Cullompton development.

It was confirmed that this option would enable Junction 28 to operate on the basis that south bound trips from the new development and south west area of Cullompton would use the new junction in preference to Junction 28. This could incorporate

provision of a Town Centre Relief Road to the east. The Town Centre Relief Road would provide air quality improvements through the removal of an element of through traffic from the town centre.

Local Authority appointed transport consultants have developed an initial design for the new junction in conjunction with close working with the Environment Agency, with regard to detailed flood modelling analysis, and ongoing liaison with Highways England. Similarly meetings have been held with Network Rail. This liaison will continue to be ongoing as this work is further refined towards planning application stage.

We have discussed the need for investment in this scheme with the Heart of the South West Local Enterprise Partnership and will continue to press this case. Importantly the new major highways improvements will facilitate delivery of the 'Culm Garden Village'. The status of the Garden Village proposal should also assist in enhancing the case for securing national pump priming opportunities when they arise.

Given the current capacity difficulties at Junction 28 the latest modifications to the Local Plan Review incorporate proposed changes, at the request of Devon County Council, to ensure that capacity issues at junction 28 are fully considered as part of applications that could come forward in the earlier part of the plan period before a full and comprehensive scheme is provided. DCC, in liaison with HE, is currently considering what improvements could be made in the interim to enable some development to come forward.

Cross-boundary issues specifically around the A373 (linking Cullompton and East Devon) were raised at submission stage by East Devon District Council. Devon County Council has identified that there are no major improvements envisaged for the A373 and that minor improvements should be considered at the planning application stage. We have made an amendment to the plan to clarify that a transport assessment will be required to accompany a planning application and that this assessment will need to fully consider the impacts on the A373 and identify any necessary mitigation.

The Civil Aviation Authority has no objections to the Local Plan proposals.

Education

The County Council has been involved in the preparation of the education elements of the Infrastructure Plan which are reflected in the Local Plan and in the development of local plan policies. This is confirmed in the County Council's responses to the proposed submission local plan in 2015 and the more recent consultation on the proposed modifications 2017.

Green Infrastructure

A Green Infrastructure Assessment was prepared in 2013 and did not find any significant cross-boundary issues in green infrastructure provision. This work was informed by liaison with partners including Natural England, Devon County Council, English Heritage, Environment Agency, Neighbouring Authorities and Devon Wildlife Trust. It is intended that there will be continued liaison in future years to ensure effective delivery of the plan.

Landscape

Landscape evidence has been prepared in consultation with adjoining authorities and Devon County Council to increase the consistency of approach across boundaries - in particular Mid Devon sits on the Devon Landscape Policy Group which facilitates joint working on landscape planning and management issues. This relates particularly to the Landscape Character Assessment (2011) which is reflected in the plan policies.

The Blackdown Hills Area of Outstanding Natural Beauty takes in parts of Mid and East Devon, South Somerset and Taunton Deane. The Council is a member of the Blackdown Hills AONB Partnership and has a representative on the Management Group which meets regularly. Mid Devon DC is one of the main funders of the partnership, which prepares the Management Plan for the whole AONB on a cross-boundary basis. The policies of the local plan reflect the agreed approach within the Management Plan.

The Local Planning Authority adjoins both Exmoor and Dartmoor National Parks, and contains policies which protect their settings, reflecting their national landscape status and their statutory purposes in accordance with the duty set out in section 11A of the National Parks and Access to the Countryside Act 1949 [as amended by S.62 of the Environment Act 1995]. The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.'

Energy policy

There are no cross-boundary energy issues requiring consideration in the local plan.

Biodiversity

The Council has prepared a Habitat Regulations Assessment to consider the implications of the plan proposals on European Wildlife Sites. This assessment indicates that the plan will not impact on any such site alone or in combination with any other plan or project. Cross boundary working with North Devon in particular

took place in the preparation of this document, related to the Culm Grasslands site to the north of the district. With the inclusion of land at Junction 27, and associated housing, an Appropriate Assessment Report was commissioned and completed in December 2017. This Assessment considered potential impact on the SAC and concludes (at para 5.1) that “the J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC”. These findings have been shared with Natural England and its representation to the proposed modifications acknowledges this.

Other Natural England comments on the plan, although not necessarily covering duty to cooperate matters, have been considered and appropriate amendments made. Further meetings have been scheduled to strive towards agreement on additional comments more recently received from Natural England.

The Council has reflected other cross-boundary ecological matters in its plan, such as the North Devon Biosphere and Strategic Nature Areas.

Heritage

The County Council provided advice on the heritage implications of potential development sites for consideration in the SHLAA which were then considered within the preparation of the Local Plan and the associated Sustainability Appraisal and Strategic Environmental Assessment. DCC hold historic environment records which have, and continue to be, a valuable resource. In accordance with the advice of Historic England, although not necessarily relating to duty to cooperate matters, further heritage assessments of proposed housing sites have been undertaken, and appropriate amendments made to the local plan in advance of submission.

Minerals

A number of Minerals Consultation Areas are included in the adopted Minerals Local Plan. No allocations have been included on these areas, to prevent sterilisation of minerals resources.

Waste

A site for an energy recovery facility within Mid Devon, is allocated within the Devon Waste Plan 2014. This site is within the Tiverton Eastern Urban Extension, and can come forward as part of the employment provision proposed within the Local Plan Review, as indicated in the approved Masterplan SPD for the site.

Flood Risk

The Council commissioned a Strategic Flood Risk Assessment and has used this work to guide the policies, strategy and allocations within the Local Plan. The Lead Local Flood Authority (Devon County Council) and the Environment Agency were involved in the preparation of this report and the Local Plan itself. The Environment Agency’s various detailed suggestions for policy wordings have been considered and

a number of changes made. The Local plan has considered the implications of the defined Critical Drainage Area, which covers the River Culm area upstream of Cullompton. The Environment Agency, Mid Devon District Council, Devon County Council and Devon County's hydrological consultants have been working closely with respect to detailed flood modelling for the area east of Cullompton with respect to the Local Plan evidence base. This collaboration will be ongoing in order to inform a future planning application for major highways works to facilitate development in this locality.

Exeter City Council suggested a flood prevention area be considered for the Exe upstream of the city during the options consultation, however this suggestion has for the moment been overtaken by the £30m flood defence enhancements to be completed in 2018, and they did not repeat the request.

Health and Wellbeing

Infrastructure Planning considered the need for health and other community facilities, in consultation with Devon County Council and the various arms of the National Health Service.

Infrastructure Planning

In addition to the specific discussions referred to earlier in relation to transport, education and health, Mid Devon has worked with a number of bodies to plan for the infrastructure needed to be provided over the lifetime of the plan. This has included discussions with the emergency services, including the police and fire services over facilities to meet the need of an increasing population, Environment Agency over flood protection measures and South West Water to discuss future water and sewerage capacity within the district.

Future Strategic Cooperation

The Councils of the Housing Market Area (Greater Exeter) have recently agreed to prepare a joint Local Plan or Strategy looking further forward than the time of the Mid Devon Local Plan and other local plans in the area. This recognises the importance of joint cooperation on a range of housing, economic, infrastructure and other key matters facing the sub-region. As referred to earlier in the statement the planning authorities in Devon have prepared and signed a Duty to Cooperate protocol to ensure that strategic issues are dealt with appropriately in light of the duty.

APPENDIX A

Non-Exhaustive list of Local Plan meetings held with 'Duty to Co-operate' Partners

Date	Duty To Co-operate event
23 July 2013	Mtg with DCC/EDDC/TDBC/SCC
21 November 2013	Mtg with DCC/TDC/ECC/EDDC/DNPA/TDC/NDDC/WSDC/HA
27 January 2014	Mtg with DCC/TDBC/TDC/EDDC/ECC/Exeter & East Devon Growth Point Apologies HA/ENPA/EA/WSDC/NDDC/DNPA/WDBC/NE
20 March 2014	Mtg with TDBC
10 June 2014	Mtg with TDC/EDDC/ECC/TorridgeDC/DCC/HA
11 July 2014	Mtg with TDC/ECC/TDBC/DCC/HA
22 September 2014	Mtg with DCC/EA
13 November 2014	Mtg with DCC/NE/DCC/GVA/ECC/NDDC/TDBC/TDC Apologies TDC/EH/HA
23 February 2015	Mtg with DCC/HA/ECC/EDDC/NDDC/WSDC/TDBC/MDC/PCC/GL Hearne/ CBRE Apologies: NE/EH/TDC/EA
15 June 2015	Mtg with DCC
17 June 2015	Mtg with HE
24 July 2015	Mtg with EDDC/ECC
21 August 2015	Mtg with EA
3 September 2015	Mtg with HE
4 November 2015	Mtg with EA/DCC
8 December 2015	Mtg with DCC
3 February 2016	Mtg with DCC/WSP Consultants
23 February 2016	Mtg with DCC/WSP Consultants
21 March 2016	Mtg with DCC/HE/WSP Consultants
12 April 2016	Mtg with DCC/HE/WSP Consultants
5 May 2016	Mtg with HE/DCC/WSP Consultants
12 May 2016	Mtg with EA/DCC/WSP Consultants

16 May 2016	Mtg with DCC/EDDC/ECC/MDC/SCC/TDC/WSDC/TDBC
16 June 2016	Mtg with EA/DCC/WSP Consulting/Arcadis
28 July 2016	Mtg with EA/DCC/WSP Consultants
12 September 2016	Teleconference with NE
26 October 2016	Mtg with DCC
27 October 2016	Mtg with EA/ WSP Consultants/Arcadis
28 October 2016	Mtg with Network Rail
7 November 2016	Mtg with DCC/HE
15 November 2016	Mtg with Nathaniel Litchfield & Partners/DCC/ECC/Historic England/Torridge DC/NDDC/PCC/TDC/WSDC/EA Apologies NE/EDDC/SCC/HCA/TDBC
13 December 2016	Mtg with HE/ DCC/WSP Consultants
19 January 2017	Mtg with EA/DCC/WSP Consultants/Arcadis
13 February 2017	Mtg with DCC
14 February 2017	Mtg with DCC/EA/WSP Consultants/GL Hearn
27 February 2017	Mtg with HE/DCC
9 March 2017	Mtg with EA/DCC/WSP Consultants/Arcadis

Abbreviations used

DCC- Devon County Council

SCC- Somerset County Council

EDDC – East Devon District Council

TDC – Teignbridge District Council

TDBC – Taunton Deane Borough Council

DNPA – Dartmoor National Park Authority

NDDC- North Devon District Council

WSDC-West Somerset District Council

HA/HE- Highways Agency/Highways England

NE – Natural England

EA- Environment Agency

MDC-Mendip District Council

HCA-Homes & Communities Agency

PCC-Plymouth City Council

EH-English Heritage

ECC – Exeter City Council

APPENDIX B

The organisations with whom Local Authorities are required to co-operate as appropriate

Highway Authorities;
Environment Agency;
The Historic Buildings and Monuments Commission for England (known as Historic England);
Natural England;
The relevant Local Enterprise Partnership;
The relevant Local Nature Partnership;
Highways England;
Homes and Communities Agency;
Civil Aviation Authority;
Clinical Commissioning Groups and NHS England;
Office of the Rail Regulator;
Transport for London;
Integrated Transport Authorities;
Marine Management Organisation

Housing provision calculations

Dartmoor

The AMR indicates an annual rate of development for the Park as a whole of 55 dwellings per annum. Approximately 50% of the development is expected to be in Teignbridge, which lies within the Exeter HMA.

East Devon

East Devon Local Plan (adopted January 2016) sets out that the total provision for 2013 – 2031 is 18,241 dwellings, ie 1013 per annum. See Strategy 2, note 3.

<http://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf>

Exeter

Exeter Core Strategy (adopted February 2012) sets out a total provision of 12,000 dwellings between 2006 -2026 i.e. 600 per annum. See Policy CP1.

<https://exeter.gov.uk/media/1636/adopted-core-strategy.pdf>

Mid Devon

The proposed changes to the Mid Devon Local Plan submission includes provision for a total of 8,634 dwellings for the period 2013 – 2033 ie 432 per year.

Teignbridge

The Teignbridge Local Plan sets a target of 620 dwellings per year, however, more recent data (including above-target completions during the first two plan years) indicates that this is likely to be exceeded. At April 2015, the total provision available for the plan period was 13,102 dwellings, consisting of 1459 completions, 4425 commitments (including dwellings under construction) and 7218 further local plan allocations. This is the equivalent of 655 dwellings per year.