

MID DEVON LOCAL PLAN REVIEW 2013 – 2033

Proposed Submission (incorporating proposed modifications) Examination

Inspector: Paul Griffiths BSc (Hons) BArch IHBC

Hearing 1: Tuesday 26th & Wednesday 27th September 2017

Matters and Issues: Policy J27

Statement of Mid Devon District Council

ISSUE 1 Is the evidence base sufficiently robust to demonstrate a need for the scale of the tourist attraction proposed?

Site History

- 1.1 The first consultation in the Local Plan Review process took place in January 2014. In that Options Consultation a site was included as an option at J27 of 200 hectares for mixed commercial and residential development, which included a designer outlet village, leisure, tourism and other uses. When considering the consultation responses and the evidence base, for the 2015 submission, the Council resolved to identify Cullompton East as its preferred strategic housing growth area (CU7–12) and resolved at that time not to include the 98 hectare commercial allocation at J27. At that time sufficient evidence was not available to demonstrate, need, a robust sequential site analysis and the potential impact on other centres and other development plan commitments and proposals in the catchment area. The Submission Plan without land at J27 being included, was published for consultation February – April 2015. Representations were received in respect of the non-allocation of land at J27. Those representations were considered by the Council together with further studies carried out by consultants employed by the Council to consider the robustness of the evidence base submitted in the representations particularly in relation to retail development.
- 1.2 Three consecutive studies were carried out by Nathaniel Lichfield and Partners,
- to address the representations received,
 - to provide further analysis on questions which remained in the conclusions of the first report, and following the second report;
 - questions raised by duty to co-operate partners were addressed in the third report.

- 1.3 Following these detailed reports and having examined other evidence which had arisen during the period, the Council considered at a meeting in September 2016 whether to modify the plan in respect of J27, prior to submission, in the light of the additional evidence which was then to hand.
- 1.4 The Council decided in the light of the additional evidence to include land at J27 in the Proposed Submission Plan (including modifications) for tourism, leisure and retail development. The allocation area now proposed is smaller than that considered previously and has no provision for warehousing, housing, cinema, conference hall, or garden centre, which had been considered at the options stage.
- 1.5 The development focus is now substantially more tourism and leisure focused with some very specific controlled retail provision. The commercial site area has been reduced from 98 hectares to 71 hectares so the site now allocated is approximately 28% smaller than the allocation originally put forward at the option stage.

Policy

- 1.6 Backing the Tourism Sector - A Five Point Plan - Department of Culture media and Sport – July 2015 recognises that “given that tourism is a dynamic sector, with new business models emerging all the time,” it seeks to “ensure that common sense prevails and we miss no opportunities to protect and grow the tourism sector”.
- 1.7 **National Tourism Policy - Department for Culture Media & Sport - Tourism Action Plan - Published August 2016.** The document identifies tourism as one of the UK’s most important industries. The forward by the Prime Minister states “We must ensure that the benefits of tourism are shared across cities, regions and nations up and down the Country” and the policy seeks to rebalance the sector, boosting tourism jobs and growth right across the country.
- 1.8 It states “With employment in tourism growing at a faster rate than total UK employment, the Government has been working to improve perceptions of the tourism industry we will also be working with the Tourism Industry Council to undertake a programme to work to promote the tourism sector as a great place to build a career.
- 1.9 The Action Plan states “*The actions in this report together with our new industrial strategy will make our tourism sector more internationally competitive and resilient and ensure that its growth delivers for everyone*”. Tourism is seen by the UK Government as a key area for growth and for the development of skills and jobs.
- 1.10 **Planning Policy - National Planning Policy Framework (NPPF) and associated Planning Guidance.** The NPPF paragraph 28 stresses the importance of supporting “*economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.*” To promote a strong rural economy local plans should,
- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*

- *promote the development and diversification of agricultural and other land-based rural businesses;*
 - *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres;*
- 1.11 NPPF Paragraph 154 states “Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.” Policy J27 seeks to do just that.
- 1.12 NPPF Paragraph 156 states “*Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:*
- *the homes and jobs needed in the area;*
 - *the provision of retail, leisure and other commercial development;*
- 1.13 Paragraph 157 states, “*Crucially, Local Plans should:*
- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*
 - *be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*
 - *be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;*
 - *indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*
 - *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*
- 1.14 NPPF paragraph 158. *Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.*

Mid Devon Context

- 1.15 **Shared Economic Strategy 2017-20.** The Exeter and Heart of Devon Economic Partnership, Shared Economic Strategy 2017-20, published November 2016, adopted by all four partners (Exeter City Council, East Devon, Mid Devon and Teignbridge District Council's) seeks a collaborative approach to growth and productivity. It identifies (page 9) three overlapping functioning economic market areas, one being the M5 Corridor. It acknowledges that Exeter's housing and economic needs will increasingly be met beyond the borders of Exeter within East Devon, Mid Devon and Teignbridge (page 9). The development of J27 is identified as part of that strategy (page15)
- 1.16 **Mid Devon's Corporate Plan 2016 to 2020.** The plan identifies the tourism sector of the economy as one of its corporate growth aims identifying the need to increase the number of people visiting, staying and spending money in the district and improving the marketing of Mid Devon as a visitor destination.
- 1.17 The Corporate Plan aims to attract new businesses into the district and identifies a particular focus on agriculture, **the food and drink offer, leisure and tourism**, professional scientific and technical.
- 1.18 The Corporate Plan aims are carried through to the Local Plan Review 2013-2033 following the recommendations identified in the **2014 Tourism Study** which identified a number of opportunities for Mid Devon to increase its share of the tourism market. Policy DM22 of the Local Plan Review provides a supportive policy base for tourism expansion generally to address the areas for expansion identified in Strands 1, 2, 3, and 4 of the recommendations of the Tourism Study while recommendation Strands 2, 5 and 6 of the study are addressed by Policy 27 of the Local Plan Review. Mid Devon have positively prepared the plan, including in the way it responds to tourism need.
- 1.19 **Visit England "Domestic Leisure Tourism Trends for the Next Decade"** - December 2013, considered the types of tourism the industry should be planning for over the following decade. It concludes the tourism trends are:
- *Increasing short breaks (at the expense of longer ones) and turning VFR trips (visiting friends and relatives) into leisure ones.*
 - *Broader leisure portfolios will encourage people to try new types of holiday – whether at destination level or activity type.*
 - *Demographic trends will heighten the importance of family trips.*
 - *Active tourism is growing as a reaction to more sedentary lifestyles – people also "de-stress" through adventure experiences.*
- 1.20 The allocation proposals for J27 provide for the types of tourism and leisure trend identified by Visit England. The J27 allocation lies at the gateway to Devon and Cornwall. It provides a unique regional opportunity to expand growth in the tourism sector in Mid Devon. The Junction J27 allocation is a considered response to the challenge of attracting more visitors to the district and increasing the economic spin-offs from tourism. This is consistent with the guidance contained within the NPPF paragraph 154 "Local Plans should be aspirational but

realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where”

1.21 Mid Devon seeks to maximise, in line with the National Tourism Policy, the growth and job opportunities tourism and tourist related activity can contribute to the Mid Devon economy.

1.22 Junction 27 is a strategic transport node where the M5 motorway, the A361 North Devon link road and the A38 converge in close proximity to Tiverton Parkway rail station. It provides a uniquely accessible location from a regional perspective forming a gateway by road and rail to Devon and Cornwall via which millions of visitors travel throughout the year to access the South West peninsula.

Mid Devon Statistics

1.23 Mid Devon has the lowest tourism day visits (by English Local Authority) of all the Devon Districts. Mid Devon also ranks 259/309 of out all English Local Authority areas (source: Visit England).

Three Year Averages By Local Authority (2013 to 2015) (Source: Visit England)				
	Tourism Day Visits		Total tourism (Day Visits and All overnight tourism combined)	
	Visits	Expenditure	Visits	Expenditure
	Millions	Millions	Millions	Millions
East Devon	4.55	£136	5.277	£314
Exeter	5.44	£216	5.920	£282
Mid Devon	1.55	£39	1.690	£61
North Devon	4.15	£169	4.844	£324
Plymouth	4.36	£277	4.898	£369
South Hams	3.84	£51	4.414	£200
Teignbridge	4.17	£96	4.459	£163
Torbay	5.90	£132	6.630	£302
Torridge	1.65	£34	1.917	£98
West Devon	2.49	£57	2.743	£107
DEVON (total)	38.11 Visit Devon (28.6)	£1,208 Visit Devon (£1,013)	42.793	£2,221
Mid Devon`s visitor share	4%	3.20%	3.90%	2.70%

1.24 It is not surprising therefore that Mid Devon seeks to expand its share of the Devon and South West tourist market and economy. Expanding the tourism economy in Mid Devon will increase employment opportunities and boost the economic prosperity of the district. Mid Devon is the least visited district compared to the other Devon districts indicating there is plenty of room to grow the sector.

1.25 As demonstrated by the above table from the “Visit England” data, Mid Devon captures only 3.9% of the visitors and only 2.7% of the Devon tourist economy even though the M5 carries 24.3 million vehicles¹ through Mid Devon annually and nearly half a million (478,000) rail passengers² pass through Tiverton parkway each year.

1.26 According to a report published by Visit Devon, October 2016, Tourism is the largest revenue generator in Devon. 90% of visitors to the county are domestic visitors, with the majority being independent and not coming through the travel trade. Tourism is crucial to the economy and prosperity of Devon, and is seen as an area where Mid Devon needs to expand its share of the tourism market and provide additional employment opportunities and economic benefits to the district.

1.27 The principle areas of Devon Tourist spend according to Visit Devon are:-

DEVON – Direct visitor expenditure by category according to “Visit Devon”			MID DEVON – Direct visitor expenditure by category according to “Visit Devon”		
Areas of Tourist spend	Millions	% of money spent in Devon	Millions	Spend in Mid Devon as a % of Devon Total	
Accommodation	494,938,000	20.8	15,129	3.05	
Shopping	525,242,000	22.0	23,704	4.51	
Food and Drink	731,349,000	30.7	31,644	4.32	
Attractions /Entertainment	265,976,000	11.1	11,961	4.49	
Travel	367,140,000	15.4	13,636	3.71	
SUB TOTAL	2,384,645,000	100%	96,074,000	4.02	
DEVON -Other visited related spend by category			MID DEVON - Other visited related spend by category		
Second Homes	8,175,000		180,000		
Boats	7,374,000		0		
Visiting friends and Relatives (non-visitor spend)	71,756,000		4,879,000		
SUB TOTAL	87,305,000		5,059,000		

The Economic Impact of Devon’s Visitor Economy 2015 – Visit Devon – October 2016

1.28 The allocation at J27 seeks to make provision for developments which provide for all those areas of visitor spend, the allocation provides for visitor attractions, accommodation, food and drink, specialised retail provision and travel services. The allocation proposed at J27

¹ Supplied by Highways England sourced from 2016 MIDAS data, sourced from WebTRIS.

² 15/16 Annual estimated passenger usage based on sales of tickets in stated financial year(s) which end or originate at Tiverton Parkway Office of Rail and Road statistics

seeks to provide a destination that will attract a wide range of visitors, from all age groups and one that provides a destination for short breaks and day visits. It will provide an all year round, all weather attraction.

- 1.29 Tourism is recognised as an important driver of the District's economy. It contributes significantly through job creation, increased expenditure and income into local communities. In 2015, Mid Devon attracted approximately 212,000 staying visits from UK and overseas visitors combined with approximately 1.59 million day visits, generating an estimated £101 million pounds worth of visitor spend in the local economy. Approximately 1,500 full-time equivalent jobs within the district are tourism related, representing 5% of all employment in Mid Devon.
- 1.30 Mid Devon has identified a need for a step change in the tourist and leisure attractions provided in Mid Devon to increase its share of the Devon Tourist Economy. The Mid Devon Tourism Study 2014 recognises Mid Devon's strategic location and the accessibility of the area because of the motorway network and mainline rail connections.
- 1.31 Mid Devon lacks a major visitor attraction. The evidence base identifies the opportunity presented by the M5. The allocation of land at Junction J27 seeks to address strands 2, 5 and 6 of the Mid Devon Tourism Study and identifies a range of attractions to attract visitors to stop, spend and perhaps stay, providing an all-weather attraction which will appeal across all visitor groups. It will require an individual product providing a 'major' tourism destination that can compete in the market. To do less at J27 would be a wasted opportunity of this unique locational opportunity. The Mid Devon draft Destination Management Plan recognises the economic challenge of the "competition from other destinations managing tourism more effectively". Mid Devon needs to manage tourism better and the scale of the tourist attraction is set by the need for a significant regional attraction. The M5 corridor is identified as one of the functioning economic market areas in the Shared Economic Strategy 2017-20.
- 1.32 J27 is a uniquely accessible transport node that that provides a regional opportunity to expand on growth in the tourism sector by getting tourists to stop in Mid Devon and to increase length of time and spend in the District.
- 1.33 The ambition to make a step-change in the tourism-offer in Mid Devon requires the development of a multi-faceted facility for the region and for the type of attraction that is identified in the allocation. The scale is, therefore, informed by requirement to provide a collection of different uses and facilities that combine to offer individual or linked attractions depending on the nature and length of the visit being considered.

List of Reference Documents

National Planning Policy Framework. - March 2012

National Planning Practice Guidance – updated July 2017

Backing the Tourism Sector - A Five Point Plan - Department of Culture media and Sport – July 2015

Tourism Action Plan. – Department of Culture Media and Sport. – August 2016

Shared Economic Strategy 2017-20. A collaborative approach to growth and productivity, November 2016. (*Heart of Devon Economic Partnership – Exeter City Council, Teignbridge, East Devon and Mid Devon District Councils*).

Mid Devon District Council, Corporate Plan. 2016 -2020

Mid Devon Tourism Study. – 2014

Visit England – Domestic Leisure and Tourism Trends for the Next Decade -2013

Visit England - Three Year Averages by Local Authority. (2013 to 2015)

Visit Devon – The Economic Impact of Devon`s Visitor Economy. - October 2015