



Report to Mid Devon District Council

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REPORT ON THE EXAMINATION INTO THE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 22nd August 2006
Examination hearings held on 27th / 28th February & 7th / 8th March 2007
**INSPECTOR'S REPORT ON THE MID DEVON DISTRICT COUNCIL CORE
STRATEGY DEVELOPMENT PLAN DOCUMENT**

INSPECTOR'S REPORT ON THE MID DEVON DISTRICT COUNCIL CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

1 Introduction

1.1 I have been appointed by the Secretary of State to carry out an independent examination of Mid Devon District Council's Core Strategy Development Plan Document (DPD), submitted to her on 22nd August 2006. A pre-examination meeting was held on 27th November 2006. The examination has been conducted by way of written representations and by way of hearing sessions held between 27th February and 8th March 2007. I have also had regard to all the representations which were made on the DPD in the 6 week period following its submission to the Secretary of State.

1.2 My report firstly makes comment upon general issues and the changes that have been proposed. In section 2, I set out a brief summary of my findings. Following this, in section 3, I set out my conclusions on the soundness of the plan; firstly under the procedural tests and then under a series of headings, based upon the issues which formed the focus for the examination hearing sessions. Finally, I make my formal recommendation.

1.3 My role is to consider the soundness of the submitted document, having regard to the tests of soundness as set out in PPS12 and the guidance in the Planning Inspectorate's "Guide to the process of assessing the soundness of Development Plan Documents". Following the receipt of representations on the submitted plan the Council proposed a number of minor changes. In addition, during the course of the hearing sessions the Council, and some of those present, prompted on occasion by me, advanced a few further suggested wording changes.

1.4 An important feature of the new plan making system is the principle of "front-loading"; the adoption of that approach meaning that changes following submission would not be expected and should not be proposed (PPS12 paragraph 4.18). It is understandable, at this early stage in the development of the new system, that the front-loading process has not worked as well as it should. However, there is a clear limit to my ability to recommend the adoption of changes to the submitted document. This is because of the need for community involvement at all stages in the generation of the plan and for any significant matter to be subject of sustainability appraisal.

1.5 With that in mind, I have considered the proposed minor wording changes put forward by the Council in response to the representations, and have supported those which in my view are justified, improving the clarity of the Core Strategy, but not requiring further consultation or sustainability appraisal. In addition, I have proposed some changes myself following from the discussions at the hearing sessions. In so doing I have had regard to draft wording provided by the Council and others in response to my requests, which I have altered as I have felt appropriate. Those changes I recommend overcome a number of points of unsoundness and render the plan sound. In doing so, they improve the sense of the plan and make it fit for purpose, without making significant or substantial changes to its direction, that might have required further public consultation and/or sustainability appraisal.

2 Summary of findings

2.1 I find that the plan meets the procedural tests i to iii.

2.2 I have also found that the plan has a number of weaknesses which would make it unsound when tested against the soundness tests iv to ix. However, I have recommended a number of changes which are justified by the evidence presented to me which render the plan sound, in so doing they improve the clarity and understanding of the strategy.

2.3 The plan is very well written and is easy to read. The early sections are, however, rather wordy. The spatial portrait could have been punchier, bringing out more clearly the key local issues. The sections on national and regional policies and strategies could have been very substantially shorter, and the description of the alternative strategies reduced to a single paragraph. These are matters that the Council may wish to address when the plan is reviewed.

2.4 The plan represents a commendable effort by the Council, particularly as it was prepared in advance of much of the emerging guidance. Although I find it sound, subject to the changes recommended, a cautious approach should be taken to using it as a template by others preparing their own Core Strategies. My report highlights a number of areas where the strategy is considered to be weak. I have found that these weaknesses can be overcome by additional wording, so that, following these changes none of them individually or cumulatively, render the strategy unsound. Some of my changes strengthen the strategy, but elsewhere, where this has not been possible, I have drawn the attention of the Council to further work that may need to be undertaken when the strategy is reviewed or when subsequent DPDs are prepared.

3 The soundness of the Core Strategy

3.1 Procedural tests i to iii

3.1.1 The Core Strategy is contained within the Council's Local Development Scheme, the updated version being approved in August 2006. There, it is shown as having an examination date of February 2007. Test i of paragraph 4.24 of PPS12 is met.

3.1.2 The Council's Statement of Community Involvement (SCI) has been found sound by the Secretary of State and was formally adopted by the Council whilst the examination hearings were taking place. It is evident from the documents submitted by the Council, including the Regulation 28 and 31 Statements and its Self Assessment Paper, that the Council has met the requirements as set out in the Regulations.

3.1.3 Alongside the preparation of the Core Strategy it is evident that the Council has carried out a parallel process of sustainability appraisal.

3.1.4 Accordingly, I am satisfied that the procedural tests i, ii and iii have all been satisfied. In addition, the South West Regional Assembly (SWRA) has indicated that the Core Strategy is in general conformity with the approved Regional Spatial Strategy (RSS, RPG10).

The main planning issues relating to soundness

3.2 The key issues and the approach to delivering the strategy.

3.2.1 The Core Strategy commences with a very full portrait of the District, describing the area and the problems that it faces. In part 6 it goes on to explain the plan's vision and spatial strategy, which follows from the perceived problems identified. The vision itself is expressed very generally, but when read in conjunction with the spatial strategy the Core Strategy is locally distinctive. What the plan does not do, however, is explicitly set out the key issues which can then be addressed. They are there by implication and are considered and addressed in both the strategy section and the core policies.

3.2.2 Because the key issues are not explicitly defined in the submission strategy it is not always entirely clear as to what the Core Strategy is seeking to achieve, what the policies are addressing and how the policies can then be assessed for their effectiveness. That said, a reading of the spatial portrait does give a full picture of the District and the key

issues can be discerned from that section. The lack of an explicit setting out of the issues is a weakness, but not one that strikes at the soundness and the credibility of the plan.

3.2.3 Chapter 8 of the plan sets out indicators and targets by which the effectiveness of the policies can be assessed. No mention is made as to who would be responsible for the implementation of these strategic policies, failing soundness test viii. Given the importance of the plan as a vehicle to achieve the delivery of the strategy it is essential that an indication be given as to the agencies which are expected to deliver it. In response to my request the Council has produced a proposed change which sets out the delivery agency for each of the indicators. This makes the plan sound in this respect and I recommend that it be made.

3.2.4 The plan does not explain what the status of the Core Strategy is and how it relates to the regional and county wide strategies, nor to those elements of the adopted Local Plan that are being saved. To rectify this omission the Council has put forward a useful additional text which clarifies the situation, explaining how this plan relates to other parts of the Development Plan. I recommend accordingly.

3.2.5 On first sight it appears that the Core Strategy contains little that relates to the strategies and actions of other stakeholders. The Council explained that the Community Strategy and the Local Transport Plan (LTP) have little spatial content that would be appropriate for inclusion in this Core Strategy. The strategy picks up the main themes of the Community Strategy and the LTP, such as air quality issues and affordable housing and includes reference to the one educational proposal in the District. I am satisfied from the evidence that the Council has been in close dialogue with all relevant parties and organisations and has had full regard to their plans, policies and programmes, such that soundness test v is met.

3.3 The relationship with the current and emerging Regional Spatial Strategy (RSS) and the overall level of development.

3.3.1 *Regional and strategic guidance.* The existing Structure Plan, which covers the period to 2016, has had its policies saved until October 2007 and it is likely that the Regional Assembly will extend its life until the emerging RSS is adopted; probably late in 2008. The emerging RSS will provide guidance to 2026, the end date of this Core Strategy. In my view the Core Strategy steers a successful course through the strategic and regional guidance and meets soundness test iv (b).

3.3.2 For the period to 2016 the Core Strategy reflects the Structure Plan approach, including the requirement for 390 dwellings per annum. Post 2016 the Core Strategy reduces the requirement to 290 dwellings per annum, matching the reduced rate proposed by the emerging RSS. In following the Structure Plan for the first 10 years, rather than the emerging RSS, the net result is that the Core Strategy proposes a rate 40 dwelling per annum higher than the emerging RSS for the 10 years to 2016, a total of 400 dwellings more. It proposes an overall rate for the 20 year life of the Core Strategy of 340 dwellings per annum, compared with 320 dwellings per annum for the emerging RSS.

3.3.3 In following the adopted Structure Plan, this has given a higher rate of housing provision than the emerging RSS. However, for a number of reasons I do not consider the conflict with the emerging guidance is crucial. The adopted Structure Plan is part of the Development Plan and is still current. The difference in level of provision is not great, nor significant enough to introduce a serious conflict between the plans. The Core Strategy still reflects the overall trend of future housing levels in the District, dropping down from past levels. In any event, the Regional Assembly has indicated that the Core Strategy is in general conformity with the emerging regional guidance. Because of these factors, and my comments below, I do not consider that there is any significant conflict between the Core Strategy and the existing and emerging strategic and regional guidance.

3.3.4 What is clear is that the RSS figures have yet to be tested. As far as one can surmise from the evidence in advance of the examination of the RSS, the housing levels in that RSS are unlikely to be reduced – the latest Office of National Statistics household projections, and the work being undertaken on possible implications of a higher growth rate, suggest that the housing requirements of the emerging RSS are underestimates and that the adopted RSS may need to raise significantly its housing requirements. That may well be the case, but whatever the position I do not consider that it would be right to identify a requirement for the District materially above that of the emerging RSS for a number of reasons.

3.3.5 Firstly, there can be no certainty as to the final global levels of housing provision that will be adopted by the RSS. Secondly, there is no reason to assume that any increase would be spread pro-rata between the local authority areas – indeed, the pro rata spread to rural districts such as this would go against the RSS strategy. Thus, it would be wrong to make any firm assumptions. The emerging RSS gives a clear figure that is not far adrift from the adopted Structure Plan. There is plenty of time to review the Core Strategy, which runs right through to 2026, should the adopted RSS come up with a significantly different requirement. There is no pressing need for this strategy to second-guess the RSS process.

3.3.6 It is clear that the Core Strategy does have an uncomfortable relationship with the regional guidance in that the current regional guidance is in the process of review. Work is well underway on the review, with the projected adoption date late 2008. However, the Core Strategy makes no direct reference to any implications arising from the current review process. Policies, most notably COR3, and COR13 to 16, are predicated on the basis of the Structure Plan, which runs only to 2016, and on the current RSS and assumes that no significant changes will arise from the RSS review.

3.3.7 No reference is made to the fact that so early in the life of the Core Strategy the regional guidance will have been reviewed, covering the time horizon to 2026. Whilst the RSS's overall direction and thrust may not radically change there is the possibility that it will, or more likely, the requirements placed upon the District will change, even quite considerably. This is something that the Core Strategy, running all the way through to 2026 ought to have clear regard to. The Core Strategy does need to show how it will react to the emerging RSS guidance.

3.3.8 Soundness test ix requires that the plans should be reasonably flexible to enable them to deal with changing circumstances. The review of the RSS is undoubtedly one of those potentially changing circumstances that the plan needs to accommodate. At the very minimum the plan should indicate what is likely to happen following the RSS review, in terms of the integrity of the plan and in what circumstances and how it itself would be reviewed, if necessary. The Council indicated that if housing rates were increased, then a pro-rata spread between the towns might be adopted. I accept that position, except where a much larger and more significant increase might generate a need for a re-think as to the best way forward. The Core Strategy is silent at the moment on this. Following my request, the Council has come up with a form of wording that explains how it would react to such a situation. Addition of this wording, amended to take into account any implications of a substantial increase in provision, would in my view overcome the current weakness. This enables the plan to meet soundness test ix.

3.3.9 As regards employment land, the Core Strategy, in seeking to achieve a level of employment provision to secure a high degree of self-sufficiency, effectively adopts the existing Structure Plan rate of 4 hectares per annum and extends this rate to cover the twenty year period of this plan. This is a sensible approach and I find no material conflict with the current and emerging regional or strategic guidance. One concern I have is that the Core Strategy gives no guidance as to the type of employment envisaged; whether

Class B1 or B2 or B8, or whether there was a place for further Business Parks or other specific forms of development appropriate to this rural area. Whilst this can be left to the subsequent Area DPDs it would have been helpful had this strategy given some lead as to what forms of employment are likely to be encouraged.

3.3.10 *Balance and self sufficiency.* One of the prime aims of the Core Strategy is to improve the District's self sufficiency by providing a better balance between housing and employment, to reduce the degree of out-commuting and improve overall levels of sustainability. To that end the level of employment is geared to both meeting the theoretical need generated by the additional housing **and** addressing the current shortfall in existing jobs to serve the resident workforce. Thus, the Core Strategy aims for a balance by 2026, providing a ratio of jobs to resident workforce of 1:1.

3.3.11 This is a desirable aim, but depends very much upon the achievability of the additional employment development. Historical rates of employment development have lagged a very long way behind the Structure Plan requirement of 4ha per annum. In response to this the Council advances evidence that where land has been made available for employment development, such as at Tiverton Business Park, and where infrastructure constraints are successfully resolved, such as at Cullompton, it has been taken up very quickly; there is an unmet demand for all types of employment land: it is the shortage of suitable and available sites that has been the drawback. The views of those present at the hearing sessions tended to support this analysis.

3.3.12 This aim of the strategy for a balance is an ambitious one. It depends on the next round of Area DPDs finding and allocating significant, suitable sites around the main towns, not an easy task given the constraints that apply, not least of topography and flood plains. If employment development lags behind new housing, there is a significant risk that the imbalance between housing and supply of local jobs would worsen, increasing out-commuting and a creating a less sustainable pattern of development. However, the Council is certain that land can be found, a matter I comment on more fully later in this report. The Council also indicated that it envisaged a number of comprehensive, mixed use schemes which should help to manage an ordered provision providing housing and employment in parallel.

3.3.13 In addition to trying to achieve a District-wide balance, the Council is also concerned that a balance be broadly achieved for each of the main settlements. It has, therefore, sought to spread new development between the towns, rather than a strategy of concentrating development at one point. Given the rural nature of the district and the wide geographical area involved, that seems a reasonable and sensible approach.

3.4 The distribution of development

3.4.1 *Previously developed land – policy COR7.* Policy COR7 provides a clear steer to the priority to be given to previously developed land. A target of 30% development is sought on such sites. This is less challenging than the adopted First Alteration Local Plan, which provides for 45% on such sites and the emerging RSS target of 50%. The target has been lowered from the Local Plan figure following further work on urban capacity, which although, unfortunately, not complete at this time, suggests that there is a lessening of potential for brownfield development in the towns. Whilst a 45% figure is likely to be achievable for a couple of years, the towns are small and do not have large areas of ageing commercial property that might come forward. This together with the recent removal of some brownfield sites and addition of some greenfield sites by the Local Plan Inspector and the sharp reduction in development within the villages means that rates of brownfield land are likely to drop towards the historic rate of 25%. I am satisfied on the evidence that a target rate of 30% is a reasonable one for the period to 2026 for this rural district.

3.4.2 *The split between town and country – policy COR12.* Policy COR12, and the associated policies COR13 to COR18, provide a precise spread of development between the main towns and the rural areas. The Core Strategy seeks to achieve a significant reduction in rural housing development, in order to secure a more sustainable pattern of development. Policy COR17 reduces the number of identified villages where development may take place within their tightly drawn boundaries to 21, from 47. Support is no longer given to conversion of rural buildings for housing and no allocations are made in the villages for market housing, both forms of development that would undermine the thrust of the strategy.

3.4.3 Of the 1,100 dwellings proposed outside the towns some 700 of them are already committed, leaving 400 to be provided; that is about one dwelling per village per year. The Council recognises that the 1,100 dwellings is not a target in itself but an estimate of the minimum number of dwellings likely to come forward within the imposed constraints. Of necessity, some flexibility is built into this figure to allow for some continuing development within the limited number of defined village settlements.

3.4.4 This approach represents a very significant change of direction from the position over the past 20 years or so of over one half of housing development being in the rural villages. This major change of direction reflects both RSS and national guidance seeking a more sustainable pattern of development. I fully endorse the broad approach of the Core Strategy to concentrate development in the main settlements. It would be unrealistic, and undesirable, to consider reducing the rural housing supply to less than 1,100 dwellings. As far as employment land is concerned I support the approach of the plan to provide about 85% of this in and around the main towns. Whilst rural employment schemes, provided for under policies COR17 and 18, should provide a useful source of rural jobs, the towns are by far the most appropriate and sustainable location for any significant levels of employment.

3.4.5 The substantial reduction of development clearly has implications for the vitality and viability of individual village services and facilities. It is evident that village services and facilities have continued to decline despite continuing significant levels of new housing. To maintain high levels of village development, without any realistic expectation of improved village services, would be to encourage the greater use of private transport to those centres where services and facilities could be found and is unsupportable. Instead, incremental development of both housing and employment will continue, within this plan's restricted approach, providing for some low level of organic growth. I comment further on villages later in my report.

3.4.6 The concentration of development in the main towns does require substantial new levels of both housing and especially employment, the latter on a scale well beyond that achieved in the past. As concluded below in respect of the individual towns, I believe that that is achievable. This is a large rural district, but the geographical spread of the main towns across the district means that none of the villages or countryside areas is too remote from the good, basic range of services provided for in those towns.

3.4.7 *The split between towns – policy COR12.* The Council has identified the split of development between the towns on the basis of their size, population, scale of employment and retail provision and the aim of achieving a better degree of self containment within each town. Growth has been matched with supporting services and constraints/opportunities for development. In addition, there has been an attempt to create a strategy whereby benefits are brought forward, such as improvements to air quality.

3.4.8 There is no exact science whereby the optimum spread of development between towns can be determined. The strategy provides for about half of all development to go to Tiverton, broadly reflecting its current position. Cullompton is proposed for about one

third of development, a level about 50% greater than its current role, reflecting the desirability of achieving development there at a scale that would enable important infrastructural improvements to the town. In turn, Crediton would receive a share of development well below its current role, reflecting the constraints to substantial development around that town.

3.4.9 I find no difficulty with the broad split between the towns. It reflects a reasonable approach to achieving a more sustainable spread and balance of development. The skewing towards Cullompton reflects its strong potential for new employment development (as evidenced in the high levels of committed employment proposals around the town). That the spread of development also reflects the desirability of achieving the necessary scale of development in Cullompton to facilitate much needed infrastructural provision represents good planning.

3.4.10 Before looking at each town in turn it is appropriate to draw out 2 issues that arise from these individual settlement considerations. Firstly, the Core Strategy is silent on how the levels of development are likely to be achieved. The absence of a housing trajectory or other information means that there is no guide as to the implications of seeking the levels of development proposed. There is no indication of current commitments and in turn the amount of new, additional development proposed, nor how it is likely to be provided, be it within the settlements, outside the settlements, on previously developed land or on greenfield sites. Secondly, the Core Strategy gives no lead as to the physical direction that development is likely to be in or in what form; whether urban extensions are likely and if so of what size or what threshold is likely to be needed to achieve certain desired aims.

3.4.11 I note that the Area DPDs currently in preparation will answer these sorts of questions, but consider that this is a failing that requires some rectification where possible in order to increase the degree of local distinctiveness and to make the plan sound. The Core Strategy ought to give some material pointers to assist the subsequent DPDs. I accept that this plan should not make decisions on inadequate evidence, nor pre-judge issues where there is still further work to be done and consulted upon. However, there will be areas where clear pointers can be given at this stage, that do not unacceptably pre-empt the subsequent plans. Accordingly, where I am able, I propose some additional wording to reflect the conclusions that can be reached at this time.

I turn now to consider the towns individually.

3.4.12 *Tiverton – policy COR13.* Tiverton is an Area Centre in the Structure Plan, a self-contained medium sized town which qualifies it as a market town under the terms of Policy B of the emerging RSS. It is proposed for about half of the new housing and a similar proportion of the employment development. Bearing in mind current commitments, this equates to about 60 hectares of additional development, of which a very large proportion would need to be on greenfield sites. Tiverton is by far the largest town in the district, with the most developed employment base, retail and education provision and the best public transport services. It is therefore, reasonable in my view to seek to allocate about half the proposed development to the town.

3.4.13 In terms of physical constraints there are fairly tight limitations to development to the south and west. To the north the North Devon Link Road provides a strong barrier, breaching of which would be a significant departure from previous approaches. The main opportunity to deliver the scale of new development proposed clearly lies to the east, although the Council at this stage is unwilling to go further, pending further studies, than say that it is a strong contender. In physical terms at least there appears to be space around the town to achieve the sort of levels of development being proposed.

3.4.14 Recent housing completions suggest there is a market for the proposed raised rate of housing provision. The town has a fairly high degree of containment in terms of the ratio of jobs to the resident workforce, which the plan aims to reinforce with a substantial increase in the rate of new employment development. The key issue here is the achievement of that level of employment. The Council explained the circumstances of both failed sites and the success of the Business Park development. It also referred to the possibility of substantial infrastructure costs, which pointed to the possibility of the need for a comprehensive development. In that way too, the provision of housing and employment could be better managed to achieve a balanced provision. However, the Council felt that it would be tempting fate to be more specific at this time as the public had not been canvassed on any options for development in and around the town.

3.4.15 In conclusion, I support the plan's proposals for the town, but consider that it should and could provide a more positive steer to the nature and direction of development, which should help concentrate minds towards the development of specific plans. I recommend some wording which develops the Core Strategy approach to a sound state and which would give it some local distinctiveness.

3.4.16 *Cullompton – policy COR14.* Cullompton is identified in the Structure Plan and current RSS as an Area Centre and functions as a category B settlement as defined in the emerging RSS. It is clearly suitable for a significant level of new development. Of the 1,900 dwellings proposed about 40% are already committed. With all but a very small amount of the employment development already committed, it is apparent that almost all will be on greenfield sites. In all, there is likely to be the need for about 35 to 40 hectares of greenfield site development. The Council is trying to promote a retail and economic expansion of the town and increase its influence, recognising its economic potential, making up for its past economic underperformance and at the same time achieving a better balance with residential development.

3.4.17 As part of its strategy for the town the plan seeks to remove or reduce through traffic from the town centre to both improve the town centre generally and specifically to improve air quality there. There are no overriding physical constraints to development and there appears to be sufficient economic momentum to sustain the levels of development proposed. In order to achieve the removal or reduction of traffic in the town centre there is a need to provide a relief road in some form. Discussions between the Council and Crest Homes suggest that a threshold of 700 to 800 dwellings is needed in order to finance the relief road.

3.4.18 Whilst there are potential concerns about the level of development having implications on Junction 28 of the M5 I heard nothing to suggest that these problems could not be overcome. Nor do I see any other constraints to the achievement of the level of development proposed. There are clear benefits in terms of improving the balance of development, building on the sustainability of the town and providing for significant improvements to conditions in the town centre.

3.4.19 Two questions arise as to whether the town should be allocated more development and whether the plan should be more specific about the form and location of the proposed development. Given the high infrastructure costs of resolving the town centre problems a key concern is to ensure that development is of the scale necessary to achieve those desired aims. The Council accepts that generally the figures proposed in the plan should be applied with a degree of flexibility, with a margin of between 5% and 10% - and to that end have proposed a wording change to reflect this. This overcomes any fears that the figures are over-precise in their definition and in principle I support that change. The Council's wording also would have allowed further variance from the Core Strategy figure where that was necessary to meet the objectives for a particular town. Again, I accept the principle of this, but consider that this approach should only apply very exceptionally so as to avoid the strategy being too lightly undermined.

3.4.20 On the evidence it seems to me that there would be considerable advantage in the promotion of a single large development which would more readily facilitate the provision of the much needed relief road, a significant strategic objective for the town. Again, on what evidence I have, it would appear that a route to the north-west side of the town may be less constrained than one to the east, the other option. However, the Council has yet to determine which option it wishes to proceed with. What is important now is that the Core Strategy promotes rather than inhibits the desired result, through avoiding an unrealistic restriction on the overall amount of development that could render the project unviable.

3.4.21 I do not consider that I have convincing evidence before me to raise the overall housing figures to a specific figure, (and in turn the employment land figure necessary to maintain an overall balance). On the face of it, the overall figures would allow for a one-off large scheme of sufficient size to provide the relief road and other benefits, such as affordable housing. However, the figures appear tight and some flexibility needs to be built in to ensure that an acceptable scheme can be progressed. The Council's added wording to the effect that the figures should be read with a degree of flexibility goes some way, but I consider that further wording should be added specific to Cullompton to the effect that a higher provision of housing (and in turn employment land) might, exceptionally, be needed to ensure that the desired aims are met for the town. That wording should also give some lead to the form and direction that that development is likely to take. I recommend accordingly.

3.4.22 *Crediton – policy COR15.* Crediton is defined as an Area Centre in the Structure Plan. Whilst it has some potential for growth it is located quite close to Exeter, which is a major commuting and shopping destination. The Council's prime aim is to improve the employment and retail provision in the town so that it retains some of the commuters and shoppers currently lost to Exeter. For that reason the housing proposals are limited to only 700 dwellings, 500 of which are already committed. Employment proposals are for a greater proportion to be provided here, mostly on greenfield sites. Although there are considerable physical constraints to development, not least the floodplains, the tightly surrounding hillsides and a number of historic parks, the Council is confident of finding the capacity for this scale of new development.

3.4.23 With its existing concentration of employment and the potential for more; its retail and other central area functions and its train station, it probably merits the status of a RSS category B settlement. I support the level and nature of the development being proposed by the Council, this reflecting the status and circumstances of the town. That said, the overall level of additional development is quite modest, reflecting the higher degree of constraints around this town compared to Tiverton and Cullompton and the on-going air quality issue. Given the imbalance between housing and employment opportunities locally it is reasonable to place the emphasis on employment development over additional housing.

3.4.24 There would appear to be demand for locally based employment in the town and the scale of proposed employment at 0.5 hectare per year does not seem excessive. The constraints are not all absolute ones and the Council's work on constraints suggests there are a number of areas that could be identified for development, albeit some sites may prove to be problematic and the target of 10 hectares of employment land may prove to be a little demanding. However, that is not to say that the effort should not be made to bring labour supply and available jobs into a better balance and make the town more self sufficient.

3.4.25 The one significant problem that needs early resolution is the matter of air quality in the town, to which I give further comment later in this report. I do not consider that that problem is beyond resolution and should not justify a lesser role for the town.

3.4.26 *Bampton – policy COR16.* The Structure Plan identifies the town as a Local Centre, and qualifies as a type C settlement under the emerging RSS. In the adopted Alteration Local Plan Bampton is identified as the sole Local Centre, below the other 3 towns in the hierarchy. Bampton has a role and function somewhere between the 3 towns and the villages. It functions as a small centre, serving a rural hinterland. In my view it is arguable as to whether it is necessary or helpful to specifically identify it separately from the villages. The Council has chosen to do so and in the absence of any compelling evidence that that approach is wrong, I am content to support the Council. The levels of development should help to enhance its role.

3.4.27 The town is tightly constrained. However, the level of development proposed is very limited, 10 dwellings per year and 0.1 hectares of employment; representing a level of organic growth. Given this low level it seems likely that the rates are achievable on the ground, having regard to the physical constraints and to the localised demand for small employment sites.

3.4.28 *Other locations.* Junction 27 has been promoted in the recent past as a location for employment development, but has been emphatically rejected by the Secretary of State as being unsuitable. In my view there are no compelling reasons that would now justify a contradictory approach to that previously expressed by the Secretary of State. The towns are the most sustainable locations and it is to there that development should be directed, rather than to the rural areas around the motorway junction.

3.4.29 This locality was advanced as being ideal for a Food Park, as a focus for the improvement/processing of West Country agricultural produce. In general terms the proposal appears to be a sound one, deserving of support in principle. It would support and develop local regional produce. A valid criticism of the Council's approach to employment is the lack of particular guidance as to the nature and form of the employment which should be encouraged. I do not consider that I can develop this point much further, except for the addition of some wording which gives general support for the principle of a Food Park, giving the plan a greater local distinctiveness. However, I do not find the argument that it should be in a specific location, close to the M5 junction a weighty one. Plenty of employment land is being proposed in and around the main towns, two of which are not too distant from the motorway. That should provide plenty of opportunity for a Food Park to be provided in a sustainable location, should the idea be pursued.

3.4.30 As regards other possible locations for development, I find none of the arguments put deserving of support. I do not consider that it would be appropriate to single out one or two villages, such as Willand, as being worthy of a greater level of development than the other villages. In my view none of the villages or other rural locations has the range of services and facilities that might make them suitable for any sizeable development. In these circumstances, to promote development in such locations would work against the thrust of the Council's strategy, which I fully support.

3.4.31 I propose a number of wording changes to the supporting text of policies COR12 to 18, to reflect my conclusions above. These provide a greater degree of direction to the nature and geographical spread of development around the towns, improving on the localised distinctiveness of the plan and in so doing render the plan sound. I see no reason to make further changes to the wording of policies as a result of my conclusions above.

3.5 The villages and the rural areas.

3.5.1 Policy COR17 provides guidance for development in and around the identified villages and policy COR18 with the remainder of the rural area. The strategy allows for

minor developments at the villages but takes a more restrictive approach to the countryside, where only those activities appropriate to a rural area will be allowed. That broad approach accords with the guidance in PPS7 and the regional and strategic guidance.

3.5.2 As regards the main issues facing these rural areas, I comment as follows: in respect of affordable housing, the Core Strategy provides for the allocation of sites for non-market housing and for exception sites. Whilst past events show little practical provision by these means, the Council was able to point to considerably more activity in recent times, with local Housing Needs Surveys and a number of sites with planning permission and 2 due to start shortly. With the local planning guidance developing and strengthening restrictions on market housing outside the tight confines of a limited number of villages, hope value is likely to diminish, increasing the willingness of landowners to release sites for local needs housing.

3.5.3 Provided the Council applies a pro-active approach, both in terms of its future area DPDs and its progression of and support for exception sites, there is every chance for increased local needs housing being provided as part of the strategy of this plan. It will be for future DPDs to spell out the details, including to what degree it would be appropriate to adopt a flexible approach to mixed housing schemes in villages. On the evidence before me I am not persuaded that at this point in time it would be appropriate to provide a more flexible policy. This could work against the efforts to lower hope value, as a means of encouraging small affordable exception sites, and at the same time undermine the overall strategy to direct market housing to the most sustainable locations.

3.5.4 As regards the decline of local services in the rural areas, there is no evidence that allowing more development in the villages would in practice increase the provision of such services and facilities. Whilst it might help to retain struggling enterprises, the price would be to increase the level of unsustainable housing, whose residents would have to travel by car for all but their most basic daily needs. In terms of declining rural employment policies COR17 and 18 together provide a positive approach to small scale employment, including farm diversification and tourism.

3.5.5 In terms of rural transport the Council indicated that there was little scope to influence the provision of rural transport. It has used the provision of public transport facilities as one of the criteria for defining the 21 villages, but beyond that it was unable to offer a more positive stance. Whilst this may be to a large degree realistic, it is a weakness that this concern has not been tackled in a more positive and pro-active manner.

3.5.6 It seems to me that in a rural district such as this the problems, issues and, in turn, the vision for the rural areas should be given more focus. New development has largely been centred upon the towns, and provides the main focus of the strategy. Over half the population live in the villages and countryside and deserve a greater prominence than given here. Ideally, the problems, needs and any support to be given to rural communities might be expressed more centrally within the strategy and cast more positively. That said, I do not find that the way that rural areas have been treated renders the strategy unsound. Overall, I am content that the framework provided by policies COR17 and 18 is appropriate and provides a coherent basis for encouraging rural enterprise.

3.6 Transport, highways and air quality

3.6.1 Policy COR9 is a very generally expressed policy on access. More specificity is found in the town policies, COR13 to 16. As I have indicated above, the plan is silent on the whole question of rural transport. The Council has indicated that this issue is more fully considered in the County's Local Transport Plan. It would have been helpful if this

had been brought out in this Core Strategy. Its absence is a weakness, but not one that renders the plan unsound. On review, the Council should give more thought to how it should cover this issue, as part of a clearer vision for the villages and countryside.

3.6.2 The suggestion was made that the plan should look more positively upon the creation of a integrated transport interchange based around Tiverton Parkway station. In principle this seems a sound idea, although there may well be fundamental problems in terms of the viability for the train and coach operators. This has been an issue that has been examined in the past and it may well be the time to look afresh at the potential here. It seems to me that it would be premature for this plan to say anything about the possibility as there are too many unknowns. However, it may well be sensible for work under the auspices of the Local Transport Plan to consider the matter further.

3.6.3 *Cullompton air quality.* A couple of streets in the centre of the town suffer badly from air quality issues arising from traffic passing through; the problems being reflected in a declared Air Quality Management Area. The solution appears to rest with a very substantial reduction or total removal of traffic from those streets. The Council suggests that the options are either a relief road to the north-west or to the east of the town, but as work is only at an early stage it is unable to prefer one over the other. Of the two broad options, that to the west seems more likely in that the route to the east would involve an area of floodplain, and possible, an in-principle Environment Agency objection. I accept that this plan is not in a position to express a firm preference for one scheme over the other. However, I do consider that it should give more of a lead into the choice and I recommend some wording to add to the supporting text to policy COR14.

3.6.4 It clearly makes for good planning to provide for a scale and distribution of development around the town in such a form that maximises the benefits to the town. The provision of a relief road in some form is essential to the quality of the town centre. The Council believes that the scale of development should be sufficient to achieve the desired ends. There is an element of uncertainty as to whether the level of development would definitely be sufficient to provide the relief road. I am unwilling to prescribe a certain level of development that would ensure this, as I have insufficient information. Rather, the plan should provide a degree of flexibility in this respect. The Council has advanced some wording to indicate that a degree of flexibility applies to the housing figures. I consider that this should go a little further so as to avoid the situation that the scale of development is insufficient to ensure the provision of the relief road. I recommend some wording to be added to the supporting text.

3.6.5 *Crediton air quality.* There is a serious air quality problem on Exeter Road and the High Street that has led to the declaration of an Air Quality Management Area and the adoption of an Action Plan to try and tackle it. The key, and only significant measure that could materially improve the situation on Exeter Road, is a reduction of heavy vehicles using that road, which could only be achieved through a link road between the A377 and the industrial estate. There remains, however, a funding issue, the link road likely to cost between £3 million and £10 million, which cannot be met from public funds. The County Council is therefore looking for contributions from future developments.

3.6.6 It will be a year before feasibility and affordability studies for the link road are complete. The County Council professes to be fairly positive about a solution being achieved, although there appears to me to be little evidence at the moment to sustain that optimism. However, in the meantime the approach of the Core Strategy, to give weight to this concern and explore developer contributions, through policy COR15(f) and (g) is the appropriate way forward.

3.7 Climate change and carbon neutral development

3.7.1 The Core Strategy is underlain by a strong theme of reducing the impact of climate change. In seeking to meet the RSS target of a 30% reduction in emissions by 2026, Policy COR5(c) specifically requires that new development will be carbon neutral in development and in use. This approach goes further than current national guidance in 2 respects. Firstly, the policy is intended to relate to construction, use and on-going transport implications, whereas national guidance concentrates upon the energy efficiency of the use of buildings. Secondly, there is no current national guidance that explicitly supports, at this point in time, all new development being carbon neutral. Whilst this is clearly a very important aspiration, recent announcements suggest that there is still a great deal of work to be undertaken to see if and how this could be achieved.

3.7.2 What policy COR5(c) would mean is that all development regardless of size would have to be carbon neutral, through directly reducing carbon emissions, generating on-site energy and/or by off-site mitigation. The Council indicates that detailed application of the policy would be developed through a Supplementary Planning Document, following consultation with the development industry and others. This might include thresholds of development and types of development to which the approach would not apply. It would also set out the formula for calculating the mitigation charge that would be applied; early work suggesting that this would be unlikely to be more than £1,000 per dwelling.

3.7.3 The Council accepts that it is going out on a limb with this policy. As a rural area, it has an above average carbon footprint, so an extra effort is needed, beyond trying to establish a more sustainable pattern of development, if a meaningful reduction in carbon emissions is to be made. There can be no doubt as to the good intent of the policy; this fully accords with the thrust of national aspirations contained in the draft Supplementary PPS Planning and Climate Change and elsewhere, and any initiative from local government must be welcome. However, the issue remains that it is very early days and that there is yet to be gained a full understanding of whether and how a carbon neutral state could be achieved, the nature and form of any on or off-site renewable energy projects, and the implications that might arise, including any knock-on effects on the achievement of the desired rates of development within the district.

3.7.4 At this point in time the policy is uncertain in its application. It cannot be fully implemented until the later SPD is prepared. That may adopt procedures that would weaken the universality of the approach. In my view it would be inappropriate for policy COR5(c) to be quite so explicit and demanding without more of the implications being thought through and the form of its application more fully considered. Without weakening the overall intent I consider that the policy wording should be redrafted to give positive encouragement to achieving carbon neutral development, whilst not specifically requiring it at this stage, explaining that the approach and application will be developed through a future SPD, which will set out what development is subject to the approach and how that approach will be applied. I recommend some revised wording.

3.8 Affordable housing

3.8.1 Guidance on affordable housing is spread around the policies, and is limited to overall numbers, which provides for 2,000 units out of a total of 6,800 dwellings, and exception sites. More detailed guidance remains within the adopted Local Plan, where policies set out more detail, such as thresholds and percentages of provision to be sought. Whilst those details were based upon evidence at the time, the Council has not completed its work on updating the evidence to develop and revise the more detailed aspects of its policy.

3.8.2 Whilst there appears, from past Housing Needs Surveys, to be no question that the scale of need far exceeds likely future provision of affordable housing, there is no up-to-

date evidence on what can reasonably be expected to be achieved on sites. What experience there is suggests that individual site provision of 40% is achievable, with a 30% overall achievement possible, depending upon the approach to site thresholds.

3.8.3 It is regrettable that this Core Strategy does not provide a more, up-to-date, evidence based policy. It is a weakness that will not be overcome until the introduction of a new, detailed approach through the Area DPDs or the Development Control DPD, possibly not before 2009. In the meantime, the Council is relying on the Local Plan approach, which was endorsed quite recently by that Inspector. Ideally, given the importance of this issue to the Council's strategy, the plan should contain a separate up-to-date policy, highlighting the approach to affordable housing provision. That it doesn't is unfortunate but given the cross reference to the recently adopted Local Plan policies I do not find that this makes the plan unsound.

3.8.4 The evidence is not yet available for a separate up-to-date policy to be included here. In the absence of this, it is important for the reader of the plan to be able to understand what policies are being applied. To assist the reader in this respect, this plan should have a clear statement as to what the full range of policies is and where it can be found. To that end the Council has produced some additional wording cross-referencing to the Local Plan policies, which I endorse.

3.9 Conclusions on the soundness of the plan

3.9.1 I have found the plan deficient in relation to a number of the soundness tests iv to ix. However, these deficiencies are not so serious nor so fundamental that they cannot be overcome by the addition of appropriate wording to the plan, to add clarity and direction and further local distinctiveness to the strategy. Generally, the plan develops national and regional policy to provide a strategy specific to the district, one that, with the additional wording recommended, would then be able to provide a sound and comprehensive basis for subsequent, more detailed DPDs.

4 Formal Recommendation

4.1 Subject to the schedule of changes set out below being carried out, I determine that the Mid Devon Core Strategy Development Plan Document, submitted to the Secretary of State on 22 August 2006, satisfies the requirements of s20(5)(a) of the 2004 Act and the associated Regulations, is sound in the context of s20(5)(b) and meets the tests of soundness in PPS12 (para4.24). I therefore recommend that the document be adopted under the provisions of section 23 of the Planning and Compulsory Purchase Act 2004.

Schedule of Changes

The following Schedule sets out the changes that are necessary to make sound and clarify the Core Strategy. It reflects all the conclusions described earlier in this Report together with changes put forward by the Council (marked as CC in the report reference column in the table below) to aid clarity and update the document in preparation for adoption. Where the changes are uncontroversial they have not necessarily been referred to earlier in this Report.

Paragraph or policy	Change recommended	Report reference
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1.4	Delete paragraph and replace with: "Devon's great variation in geology and landform encourages considerable biodiversity. Of 34 species found only in the UK, 16 are found in Devon. Three of these are believed to be found nowhere else. Biodiversity Habitat Species found within Mid Devon include woodlark, bats and dormice. Within Devon, however, Mid Devon has relatively little land designated as of national importance (11 SSSIs covering 0.3% of the land area) and no designated or candidate European sites. Nevertheless, the district supports a range of important wildlife including over 200 County Wildlife Sites and Regionally Important Geological Sites. The wider landscape contains a network of species-rich hedgerows, woodlands and river valleys linking up designated and priority habitats."	CC
1.5	Delete the paragraph and replace with: "These habitats are threatened by issues such as lack of active management, undergrazing, fragmentation, recreational pressure and climate change. Hedgerow removal and unsympathetic conversion of rural buildings can impact on important BAP species. The South West Nature Map, referred to in the emerging Regional Spatial Strategy, provides a strategic approach to habitat protection, enhancement and creation and allowing for adaptation to climate change. Areas suitable for such actions include native woodland, lowland heath, floodplain grazing marsh and purple moorgrass and rush pasture."	CC
1.9	Insert new sentence: "The Council has commissioned detailed studies of housing need, the latest of which was in 2003. This indicated a need for 353 additional affordable dwellings each year to meet both the backlog of existing need and the forecast of future need."	CC
7.1	Insert new sentence: "Accessible Green Infrastructure Networks include public open spaces, open access land, public rights of way, cycleways and other green linkages. Sustainable modes of transport include walking and cycling."	CC
7.5	Insert new sentence: "The South West Nature Map indicates areas of potential for habitat restoration and creation, and these are indicated on the Core Strategy's Key Diagram."	CC
After 7.7	<p>Add new paragraphs: "The emerging RSS was submitted in April 2006 and should be adopted by the Secretary of State in early 2008. Accordingly, it is possible that the housing supply proposed in the RSS will increase from that submitted, after this Core Strategy has been adopted. If this occurs it will be necessary to consider the distribution of additional development over and above that proposed in this Core Strategy. It would be possible to carry out an immediate Core Strategy review, but this would take time and resources that would be better spent on preparing specific allocations for development. The Core Strategy has a clear spatial strategy, set out in COR12 and reflected in policies COR13 – COR17. Tiverton, Cullompton and Crediton are the foci of development. Providing for over 80% of the housing allocations, with Bampton playing a much more limited role and the remaining rural areas providing for local needs only. This strategy is robust and would continue to be appropriate with higher rates of development. Accordingly, should the housing requirements of the RSS increase above those contained within COR12, the additional housing development will be distributed in the same proportions between the main towns of Tiverton (50%), Cullompton (35%) and Crediton (15%).</p> <p>In such circumstances there will be a requirement to increase associated provision accordingly. For example, 30% of any additional housing provision should be in the form of affordable housing and there will be a need to increase employment development by about 45 sqm floorspace per dwelling.</p> <p>However, should very much larger changes be proposed by the RSS, then a</p>	3.3.8

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	pro-rata distribution of development may not be appropriate or feasible, having regard to the level of constraints around the towns. In those circumstances the Council would need to look to an early review of the Core Strategy."	
7.8	Delete the final two sentences and replace with: "The Mid Devon Local Plan First Alteration, adopted in July 2006, contains policies relating to the provision of affordable housing. Policy H6 sets a target of 40% on sites of 15 dwellings or more in Tiverton, Cullompton and Crediton and of sites of 6 dwellings or more on other sites. Policy H7 allows "rural exceptions" sites subject to appropriate criteria. These policies will be reviewed in the light of the need to meet the Core Strategy targets set out above and the results of the Housing Market Assessment for the Exeter Sub-Region. It is proposed to review them in the Area DPDs in parallel with the allocation of housing sites. Until that time they will be the basis for decisions on planning applications."	3.8.4
COR4	Amend (b) to read: "the development of approximately 10,000 square metres of retail (A1) sales floorspace (2006 – 2016)"	CC
7.15	Amend the second sentence to read: "The figure of approximately 10,000 square metres net is the total provision required in Mid Devon from 2006 – 2016 and Core Policy COR12 sets out the proposed distribution of retail floorspace in accordance with the findings of the study. Forecasting retail need beyond 2016 is too uncertain to provide the basis for policy guidance at this time. In accordance with the guidance at paragraph 2.32 of PPS6 the assessment of retail need will be updated regularly."	CC
After 7.16	Add the following: "Within the framework of the employment policies of this plan, the principle of the establishment of a Food Park is supported, supporting the agricultural sector of the rural economy, comprising predominantly a mix of B2 and B8 uses and a minority of B1 use associated with the food industry to accommodate the processing, packaging, manufacturing, freezing, storage and distribution of food and drink and office accommodation for research and development and market research."	3.4.29
COR5	Delete clause (c) and replace with the following: "It is intended that all new development will be carbon neutral in development and use as soon as a detailed approach can be developed through the preparation of a Supplementary Planning Document (SPD) on this subject. This is likely to be through appropriate choice of materials, energy efficiency measures, transport management, renewable energy generation and carbon fixing. Until such time as the SPD is adopted all development should take positive measures to reduce carbon emissions to a realistic minimum."	3.7.4
COR10	Add a new clause (d): "Long distance recreational footpaths – Exe Valley Way, Two Moors Way, Devonshire Heartland Way, Tarka Trail and Little Dart Ridge and Valley Walk."	CC
COR11	Amend clause (b) to read: "Guide development to sustainable locations with the lowest flood risk by applying a sequential test, and locate appropriate development in areas of higher flood risk only where the benefits outweigh the risk of flooding."	CC
COR12	Amend the final sentence and headings to the table as follows: "Development rates will be approximately as follows: Average annual dwellings (of which affordable) 2006 to 2026 Average annual sqm employment 2006 to 2026 Total sqm retail sales 2006 to 2016 Amend the retail figures to read: "Tiverton 3900, Cullompton 2650, Crediton 3450 and the total to 10,000"	CC

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After paragraph 7.38	Add the following: "The Area DPDs will be expected to allocate sufficient sites within the four market towns of Tiverton, Cullompton, Crediton and Bampton to provide for these levels of development. The figures are not precise, however, and an Area DPD will be considered to be in conformity with the Core Strategy if it is within plus or minus 5% to 10% of these figures (both by settlement and overall). However, preparation of the area DPDs may indicate that even this flexibility provides for insufficient development to meet the primary Core Strategy objectives for a particular settlement. In such situations, very exceptionally, a case might be made through the relevant Area DPD for additional development proposals which better meet the objectives without undermining the overall distribution strategy. In considering such flexibility, account should be taken of the need to balance housing, employment and other related uses."	3.4.19
COR13	<p>Delete clause (d) and renumber accordingly.</p> <p>Amend existing clause (e) by adding: "including an additional 3,900 square metres of comparison net retail floorspace by 2016 in accordance with the sequential and other PPS6 retail policy considerations."</p> <p>Insert a new paragraph after paragraph 7.42: "It is likely that about 70% of new housing will take place on greenfield sites. Likewise employment land is likely to be provided almost exclusively on such land, and particularly on level ground. Given the scale of development proposed and the likely need for significant infrastructure improvements to serve it, development is likely to be in the form of a very large site or sites and in the form of a comprehensive, mixed development, with large numbers of houses helping to achieve the necessary viability threshold. B1 and B2 development are likely to be the main types of employment. Most of the development around Tiverton is likely to take place to the east of the town, where there are large areas of relatively unconstrained land, and given the significant constraints to development in the other directions."</p>	<p>CC</p> <p>CC</p> <p>3.4.15</p>
COR14	<p>Delete clauses (d) and (e) and renumber accordingly.</p> <p>Amend existing clause (j) by adding: "including an additional 1,950 square metres of convenience and 700 square metres of comparison net retail floorspace by 2016 in accordance with the sequential and other PPS6 retail policy considerations."</p> <p>Add the following after paragraph 7.48: "it is anticipated that about 70% of the new housing will be on greenfield sites, together with the large bulk of the employment provision, most of which is already committed. In view of the importance of the objective of achieving a relief road it is essential that the critical threshold level of development to provide that road is achieved. Thus, a higher provision of housing (and in turn employment land, possibly in the form of a Business Park, to secure a balance of jobs and workers) might be needed to ensure that the desired aims are met for the town. In order to achieve the relief road (which is likely to be either to the north-west or to the east of the town), it is likely that development will be primarily in the form of a single, large mixed use urban extension, possibly to the north west of the town."</p>	<p>CC</p> <p>CC</p> <p>3.4.21</p> <p>3.6.4</p>
COR15	<p>Delete clauses (d) and (e) and renumber accordingly.</p> <p>Amend existing clause (f) by adding: "including the provision of a link road between the A377 and Lords Meadow Industrial Area."</p> <p>Amend existing clause (i) by adding: "including an additional 2,100 square metres of convenience and 1,350 square metres of comparison net retail floorspace by 2016 in accordance with the sequential and other PPS6 retail policy considerations."</p>	<p>CC</p> <p>CC</p> <p>CC</p>
7.52	Delete the paragraph and replace with: "The retail study identified	CC

	considerable need for additional floorspace, which is reflected in the retail allocation for CREDITON (approximately 3,450 square metres net sales to 2016). CREDITON is particularly underprovided for retail floorspace and the policy reflects the need identified in the retail study to increase the town's self sufficiency in meeting the shopping needs of its catchment. This will permit the provision of modern retail floorspace sufficient to reduce the relative attractiveness of shopping in Exeter. The result should be reduced "leakage" of expenditure to Exeter, with reduced travel arising and associated increases in retailing employment."	
After 7.52	Add the following: "Given the considerable constraints to development around the town, most of the new housing (around 70%) and employment development are likely to take place on smaller sites adjacent to the edge of the town. Employment development is likely to be primarily aimed at meeting locally generated needs."	3.4.24
8.2	<p>Remove water quality and recycling from the list of indicators.</p> <p>Add the following implementation agencies to the Table:</p> <p>Loss of employment land and loss to residential: MDDC, Development industry, Businesses</p> <p>Density of new dwellings: MDDC, Development industry.</p> <p>Deprivation: MDDC, Development industry, County Council, Local Education Authority, Public transport providers, NHS, Devon Primary Care Trust and other health care providers.</p> <p>Public open space: MDDC, Town and Parish Councils, Sports England, Private and voluntary organisations.</p> <p>Resident satisfaction: MDDC, General users.</p> <p>Conservation: MDDC</p> <p>Biodiversity: Natural England, MDDC Landowners</p> <p>TPOs: MDDC</p> <p>Parks and Gardens: Devon Gardens Trust, English Heritage, MDDC</p> <p>Housing trajectory: Development industry, MDDC</p> <p>Affordable housing: MDDC, Development industry, Registered Social Landlords, Communities England</p> <p>Size and type of dwellings: MDDC, Development industry</p> <p>Employment floorspace, retail, office and leisure: MDDC, Development industry</p> <p>Businesses: MDDC, Enterprise South West, Business Link, Private sector</p> <p>Jobs density and job seekers allowance: MDDC Development industry, Business sector</p> <p>Tourism numbers and accommodation bedspaces: MDDC, Tourism industry, south West Tourism, Local tourist Information Centres</p> <p>Development in town centres: MDDC, Development industry, retail, business sector, leisure industry</p> <p>Employment land supply: MDDC, Development industry</p> <p>Renewable energy: MDDC, Renewable energy providers</p>	<p>CC</p> <p>3.2.3</p>

	<p>Retail indicators: MDDC, Development industry, retailers</p> <p>Development on previously developed land: MDDC, Development industry</p> <p>Proximity to services: MDDC, Public transport providers, development industry</p> <p>Permissions contrary to advice: MDDC, Environment Agency</p> <p>Employment and housing by settlement: MDDC, Development industry</p> <p>Services in rural settlements: MDDC, Service providers</p>	
Section 9	<p>Delete section 9 and replace with:</p> <p>"9.0 Relationship with the Local Plan and other LDF Documents</p> <p>9.1 The Mid Devon Local Plan First Alteration was adopted in July 2006 and contains a suite of policies for the control of development within Mid Devon. These policies are fit for purpose and are automatically saved for a period of three years from their adoption. It is open to the Council to seek to extend this saved period for appropriate policies, a course of action proposed in the Local Development Scheme.</p> <p>9.2 The Local Plan policies and proposals will be replaced by those contained in Development Plan Documents, including this Core Strategy, in accordance with the timetable for their production set out in the Local Development Scheme. Following the adoption of this Core Strategy, the current Local Development Scheme indicates that three Area Development Plan Documents will be adopted in 2009, to include allocations for uses and associated infrastructure. Following this, a Development Control Policies Development Plan Document will be adopted in 2011.</p> <p>9.3 This Core Strategy provides the strategic background to all other DPDs and SPDs within the Mid Devon Local Development Framework. These documents must be in conformity with the Core Strategy in order to be sound. A number of the policies contained in the saved Local Plan will be superseded by the adoption of this Core Strategy. The following policies will therefore no longer be saved and will not form part of the Local Development Framework: -</p> <p>S1 Area Centres</p> <p>S2 Local Centres</p> <p>S3 Villages for development</p> <p>S4 Countryside development</p> <p>H1 Previously developed land</p> <p>H14 Residential conversion of rural buildings."</p>	3.2.4
Key Diagram	<p>Include the broad locations of Strategic Nature Areas from the SW Nature Map.</p> <p>Indicate long distance recreational footpaths as mentioned in COR10.</p>	<p>CC</p> <p>CC</p>