



MID DEVON LOCAL PLAN REVIEW 2013 – 2033

Proposed Submission (incorporating proposed modifications) Examination

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Main Hearings - Hearing 1: Thursday 14th February 2019

Matters and Issues

**Vision, Spatial and Development Strategy, and
Strategic Policies**

Statement of Mid Devon District Council

ISSUE 8 Is the approach to commercial development (and Draft Policies S2 and S6) reasonable?

8) Introduction and Summary

- 8.1 The Local Plan Review meets Mid Devon’s need for commercial floorspace, with a reasonable margin to allow for market choice and flexibility. Policies S2 and S6 identify a requirement for around 147,000 sq m of commercial floor space, which is equivalent to 30-40 hectares of land, over the Plan period. The Employment Land Review Update (April 2018, document ECO09) confirmed that this figure is reasonable.
- 8.2 The Plan contains detailed area policies that demonstrate how the target can be delivered. These locations draw heavily on the recommendations of full Employment Land Review (GL Hearn 2013 ECO02). The Local Plan allocates a number of sites capable of delivering up to 212,416 sq m of employment over the Plan period (see Table 9, p28, and Policy S6 Employment). This amply meets the identified requirement for about 140,000sq m (comprising 30-40ha of employment space) and 7,000 sq m of retail space). It provides a buffer of around 44% above the requirement to allow for flexibility and choice, plus recognition that there is a qualitative need. It also recognises that some sites may come forward as mixed use sites or achieve less than 40% site coverage.
- 8.3 The Plan seeks to retain commercial floorspace where it is viable. However Policy DM19 recognises that some commercial floorspace may become out-moded and sets out a “reasonable prospects” test for the change of use of commercial floorspace as required by paragraph 22 of the (2012) NPPF. It is also noted that some commercial floorspace may be converted to residential use under “Prior Approval” permitted development.

- 8.4 The Local plan will be an important delivery mechanism for the Corporate Plan, which seeks to improve the local economy as one of its priorities¹. It sits alongside the recently published Draft Economic Strategy. The Plan provides for a range of employment opportunities that support the area's successful manufacturing and agricultural sectors, whilst capitalizing on opportunities to broaden the tourism and retail offer. The Plan also contains policies to allow for rural employment and support the rural economy (Policies DM7, 18, 20, and 21).
- 8.5 Policy S6 of the Local Plan Review defines commercial floorspace widely, encompassing "B" use classes, and other employment generating uses such as retail and tourism and specialist accommodation for the elderly. In order to provide flexibility the floorspace proposals are not broken down into specific uses. Forecasts for jobs growth suggest that about 60% of new jobs will arise in the non "Class B" sector. Nevertheless there is a particular value in Class B uses in terms of their contribution to gross value added and underpinning other sectors of the economy.
- 8.6 Appendix 1 to this Proof set out the evidence and rationale for these policies in more detail. This evidence has already been published on is in the public domain. This is structured as follows:
- **Section 1** summarises national requirements for policies in Local Plans. The NPPF requires Plans to identify and meet in full the need for commercial floorspace.
 - **Section 2** summarises Mid Devon's economic profile. The local economy has performed strongly in recent years with employment growth at around 4%, compared to 2.5% regionally. Since 2007 the annual take up of employment land has been just over 1 ha a year despite the financial crisis of the late twenty-zeros. Food and textile manufacturing are an important part of the local economy. However there remains a significant out-commute from Mid Devon particularly to Exeter, and there is a need to develop sectors such as tourism and improve the local skills base. Whilst unemployment is low, there is a very high level of self-employment, partly as a result of the large agricultural sector, but also likely representing an element of under-employment.
 - **Section 3** Summarises the evidence underpinning the Local Plan Reviews commercial floorspace targets. The 30-40 ha target is justified by Employment Land Reviews in 2013 and 2018 (ECO2 and ECO09). The Retail Study (ECO03) and Tourism Study (ECO05) also contain policies that are relevant to the commercial floorspace target.
 - **Section 4** Describes the Plan's commercial floorspace proposals and how these have been informed by the Employment Land Review, Strategic Commercial Land Availability Assessment (ECO4), and monitoring evidence.
- 8.7 Elements of the appendices are also relevant to the Development Management policies on employment related matters (Issues 16-20 of Hearing 4).
- 8.8 Appendix 2 Summarises representations made on the Proposed Submission Plan in relation to commercial floorspace. There were few objections to the Plan's commercial floorspace proposals per se, other than in the context of J27. These were considered at the Preliminary Hearings in September 2017 and not repeated here.
- 8.9 The Council is aware that its positive employment policies could have a knock-on effect of boosting housing demand (although improving the area's job density, reducing outward commuting and increasing economic activity rates in older age groups will dampen this

¹ <https://www.middevon.gov.uk/media/206666/corporate-plan-2016-2020.pdf>

need). As set out in relation to Issue 2, the Local Plan's housing requirement figure of 7,860 dwellings is above the demographically implied figure and allows for this jobs-boost.

Appendix 1 Background to The Local Plan Review's Commercial Development Policies

1. National requirements for employment policies in local plans
2. Mid Devon's Economic Profile
3. Assessing the need for employment land
4. Mid Devon Local Plan Review policies on commercial floorspace.
5. Conclusions

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Figure 13 Local Plan Review Trajectory of Commercial Development

Figure 14 Identified Retail Capacity.

Evidence Base and other documents referenced in this hearing statement:

[SD01 Mid Devon Local Plan Review Proposed Submission \(incorporating proposed modifications\)](#)

[TPA01 Housing Topic Paper](#)

ECO02 Employment Land Review (2013) <https://www.middevon.gov.uk/media/103536/economy-land-review-2013.pdf>

ECO03 Retail Study (2013) <https://www.middevon.gov.uk/media/103524/retail-study-2012.pdf>

ECO04 (a-c) Strategic Commercial Land Availability Assessments (2014)

https://www.middevon.gov.uk/media/85197/sclaa_report_2014.pdf

ECO05 Tourism Study (2014) https://www.middevon.gov.uk/media/103537/tourism_study-2014.pdf

ECO06 Rural Diversification Study 2012 Update <https://www.middevon.gov.uk/media/103538/rural-diversification-study-update-2012.pdf>

MID09 Commercial Land Availability Monitor (2018 etc.)

<https://www.middevon.gov.uk/media/346271/commercial-land-availability-summary-2018.pdf>

ECO09 Employment Land Review Update (2018) <https://www.middevon.gov.uk/media/346391/mid-devon-elr-update-april-2018.pdf>

A1. National requirements for employment policies in local plans.

A1.1 The NPPF (2012) indicates that every effort should be made to identify and then meet the needs for development including for business and industrial units (paragraphs 17(bullet 3), 20 and 21). Paragraph 22 sets out a “reasonable prospects test” to avoid long term retention of undeliverable sites. Paragraph 160-161 sets out the requirements for development plans. LPAs should (inter alia) assess the needs for floorspace for economic development, and ensure a sufficient supply of land to meet identified needs. Paragraph 28 requires that plans consider the needs of rural business. The NPPF’s policies are echoed in paragraph 61-034-20180913 of the Planning Practice Guidance².

A2. Mid Devon’s Economic Profile

A2.1 Mid Devon is a land locked predominantly rural authority, with about 25% of its residents living in urban areas of Tiverton and Cullompton. The largest employment sectors are manufacturing, wholesale and retail, and agriculture. Food and textile related activities are important to the local economy. Despite being an area where many tourists travel through, tourism related industries are under-represented in the local economy (at 18% below the national average employment for these sectors). Mid Devon has the lowest number of tourism trips and spend in Devon. Small and very small businesses are important to Mid Devon’s economy, with over 80% of firms employing 1-4 people.

A2.2 Figure 1 indicates sectors in Mid Devon by employment (from NOMIS 2017), although these figures exclude farm based agriculture. These indicate a strong concentration of manufacturing comprising 16.7 % of jobs compared to the regional and national average of just over 8%. This is due to a very strong textile and food related manufacturing sector. Wholesale, retail and transportation are also strong employers recognising the area’s good transport links; and construction is also above the regional and national average. Jobs in many “professional” sectors are below the national rate.

A2.3 These figures do not give a true picture of the significance of the agricultural sector in Mid Devon, as they exclude self-employed workers, and business owners. Agricultural Labour Force figures indicate that approximately 8% of the Mid Devon workforce is directly involved in agriculture, and 18.5% of Mid Devon businesses are dependent on agriculture, either as primary producers, processors, manufacturers or retailers. Food processing is a major element of the manufacturing sector.

A2.4 Tourism was estimated to generate about £101 million to Mid Devon’s Economy in 2015. Approximately 1,500 full-time equivalent jobs within the district are in tourism related businesses, representing 5% of all employment in Mid Devon. However Mid Devon is the least visited district in Devon, indicating that there is significant capacity for growth, as shown in Figure 2

² The July 2018 NPPF requires strategic policies to make sufficient provision for employment and other commercial development (20(a)). Chapter 6 (p23) requires planning policies to create conditions to support business expansion as well as supporting the rural economy (83). Paragraph 120 of the 2018 NPPF indicates that site allocations should be kept under review and released for more deliverable uses if there is no reasonable prospects test of sites coming forward.

Figure 1: Employee jobs by sector(2017) (NOMIS)				
	Mid Devon (employee jobs)	Mid Devon (%)	South West (%)	Great Britain (%)
Total employee jobs	24,000	-	-	-
Full-time	15,000	62.5	64.4	67.5
Part-time	9,000	37.5	35.7	32.5
Employee jobs by industry				
B : Mining and quarrying	45	0.2	0.1	0.2
C : Manufacturing	4,000	16.7	8.6	8.2
D : Electricity, gas, steam and air conditioning supply	50	0.2	0.5	0.5
E : Water supply; sewerage, waste management and remediation activities	175	0.7	0.8	0.7
F : Construction	1,750	7.3	5.3	4.8
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	5,000	20.8	16.0	15.2
H : Transportation and storage	1,250	5.2	3.6	4.7
I : Accommodation and food service activities	2,000	8.3	9.8	7.5
J : Information and communication	400	1.7	3.6	4.4
K : Financial and insurance activities	225	0.9	3.5	3.5
L : Real estate activities	225	0.9	1.5	1.7
M : Professional, scientific and technical activities	1,250	5.2	7.3	8.4
N : Administrative and support service activities	900	3.8	7.4	9.1
O : Public administration and defence; compulsory social security	600	2.5	4.2	4.3
P : Education	2,500	10.4	9.4	8.9
Q : Human health and social work activities	2,250	9.4	13.7	13.3
R : Arts, entertainment and recreation	1,000	4.2	2.5	2.6
S : Other service activities	400	1.7	1.9	2.0
Source: ONS Business Register and Employment Survey : open access - Data unavailable Notes: % is a proportion of total employee jobs excluding farm-based agriculture Employee jobs excludes self-employed, government-supported trainees and HM Forces Data excludes farm-based agriculture				

Figure 2 Number of Visitors & Spend by Devon District 2015

Area	Domestic trips (000's)	Overseas trips (000's)	Domestic nights (000's)	Overseas nights (000's)	Domestic spend (millions)	Overseas spend (millions)
East Devon	478	43	1,905	332	£100	£17
Exeter	423	58	1,446	631	£86	£37
Mid Devon	193	19	727	133	£37	£6
North Devon	937	56	4,205	364	£224	£20
Plymouth	637	76	2,186	616	£114	£33
Teignbridge	573	38	2,488	261	£119	£13
Torbay	1,084	96	4,033	563	£274	£36
Torridge	237	19	1,006	144	£53	£7

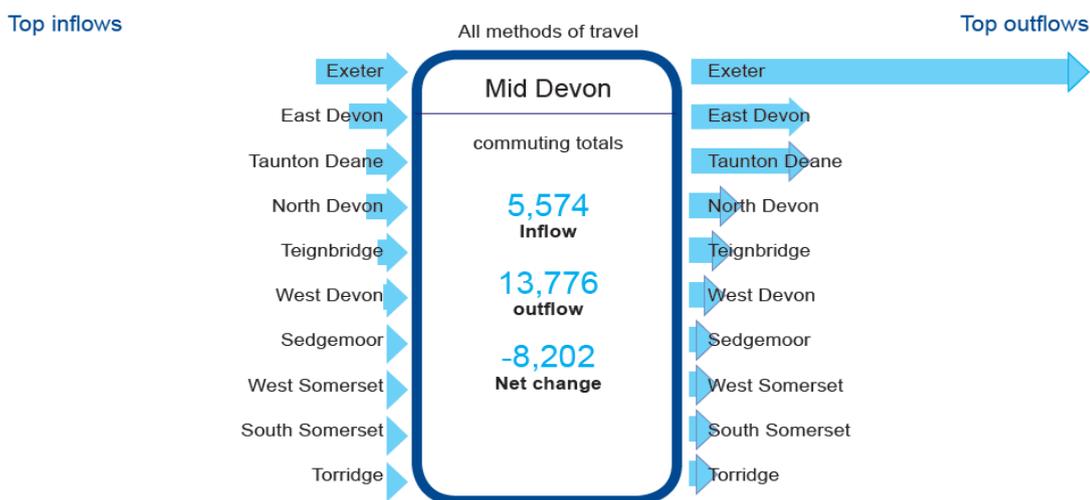
(DCC Figures: The economic impact of Mid Devon's visitor economy and evidence base 2015)

A2.5 Mid Devon is part of the wider Greater Exeter functional economic market area (FEMA) and housing market area (HMA) and there is significant commuting to Exeter and its environs. Whilst the south of Mid Devon's administrative area is within fairly easy commuting distance of Exeter, the Council does not wish to see the area developing as a satellite of Exeter. Therefore the Local Plan sets out a positive framework to attract employment to areas of strength such as food and textile manufacturing (which adds value to the rural economy), whilst promoting new sectors such as tourism.

A2.6 Mid Devon has excellent transport links in terms of the M5 corridor running north-south and A30 (A303) east-west. There is a main line railway station at Tiverton Parkway. However, there is significant passing through of the area, and the Plan seeks to capture an element of this regional expenditure.

Figure 3 Mid Devon Travel to Work Pattern by place of usual residence.

Location of usual residence and place of work by method of travel to work



Commuting totals (all methods of travel) for Mid Devon:

Inflow 5,574 person(s) commute into Mid Devon from other local authorities

Outflow 13,776 person(s) commute out of Mid Devon to other local authorities or abroad

Net change: Overall, commuting results in a population decrease of 8,202 in Mid Devon

Source:
2011 Census (ONS)

Levels of Employment

A2.7 Mid Devon has a high employment rate and low unemployment. Of the 47,100 residents³ aged between 16 and 64, 85% are economically active. This is significantly higher than the South West and the UK rates, and is at a level at which the district has effectively full employment. However, this figure includes a high proportion of part-time and self-employed workers. This could potentially mask the desire by many to work full-time but who do not currently have the opportunity, i.e. a significant level of under-employment.

Figure 4 Mid Devon Employment Profile (ONS annual population survey Apr 2017 – Mar 2018)					
	Mid Devon Numbers	Mid Devon %	Devon County %	South West %	Great Britain %
Economically Active	44,400	85.4	81.5%	80.9	78.4
In employment	43,300	82.9	78.3%	78.2	75.0
Employees	33,800	71.1	66.0%	65.7	64.0
Self-Employment	9,100	11.1	14.0%	12.1	10.6
Unemployed (Model-based)	1,100	2.5	2.6%	3.3	4.3

A2.8 Mid Devon has extremely high levels of self-employment (and this appears to have expanded much faster than employee job growth- see below). At 11.1% self-employment is higher than the national average and higher than most of our nearest neighbours. This may be a result of the low level of employee jobs in the district, but also reflects the relative strength of farming, as the majority of agricultural workers are self-employed. Construction is also a strong sector in Mid Devon, which also has high levels of self-employed workers. There is a relative shortage of highly skilled employment, representing 34% of Mid Devon's employment, compared to 38% in Devon and 45% in England.

A2.9 Mid Devon's job density (i.e. proportion of jobs to the economically active population) is around 0.78 (i.e. there are 78 jobs per 100 working age residents). This represents a net out-commute from Mid Devon largely to Exeter (whose job density is 1.2).

Employment Growth

A2.10 Both the Employment Land Review Update and NOMIS Job Density derived jobs figures point to significant job expansion in Mid Devon since 2013 (see Figure 5). Since 2013, there have been 7,000 additional jobs in Mid Devon, over 1000 a year. This may be in part be due to economic recovery, although overall levels of employment are higher than 2008. The bulk of this expansion is in non-employee jobs (e.g. self employed), and occurred between 2013-16.

³ ONS population estimates 2017

Figure 5 NOMIS Job Density Derived Employment Figures (including self employed)				
Year	Mid Devon –Jobs	Mid Devon (density)	South West (density)	Great Britain (density)
2000	29,000	0.69	0.81	0.79
2001	31,000	0.72	0.82	0.80
2002	32,000	0.73	0.83	0.80
2003	32,000	0.72	0.83	0.80
2004	31,000	0.69	0.83	0.80
2005	31,000	0.69	0.82	0.80
2006	32,000	0.70	0.82	0.79
2007	30,000	0.65	0.82	0.79
2008	30,000	0.63	0.81	0.79
2009	32,000	0.67	0.82	0.77
2010	29,000	0.61	0.82	0.77
2011	32,000	0.67	0.82	0.78
2012	31,000	0.65	0.81	0.78
2013	30,000	0.65	0.83	0.79
2014	35,000	0.75	0.86	0.81
2015	36,000	0.78	0.87	0.83
2016	37,000	0.80	0.88	0.85
2017	37,000	0.78	0.89	0.86

A2.11 Between 2009-15 there was an increase in about a thousand employee jobs in Mid Devon. Whilst significantly less than the total job creation, this represents growth of about 4%, which is higher than the regional growth of about 2.5% in the South West. A significant part of this job growth was in the manufacturing sector, which also increased its relative position in the local economy. This clearly indicates that Mid Devon is not deindustrialising. This is indicated in Figures 6 and 7. However it is noted that the total number of employee jobs expanded much less than the total number of jobs, which implies a high level of self-employment and potentially under-employment.

Figure 6 Employee Jobs 2009-15 (ONS Business Register and Employment Survey)			
Year	Mid Devon (employee jobs)	South West (employee jobs)	Great Britain (employee jobs)
2009	23,000	2,292,000	26,466,000
2010	23,000	2,263,000	26,408,000
2011	22,000	2,216,000	26,423,000
2012	22,000	2,210,000	26,576,000
2013	22,000	2,246,000	26,932,000
2014	23,000	2,331,000	27,759,000
2015	24,000	2,342,000	28,357,000

Figure 7 Manufacturing Jobs 2009-15 (ONS Business Register and Employment Survey)				
Year	Mid Devon	Mid Devon (%)	South West (%)	Great Britain (%)
2009	3,000	13.0	9.8	9.0
2010	4,000	17.4	9.6	8.8
2011	3,500	15.9	9.7	8.8
2012	4,000	18.2	9.9	8.7
2013	3,500	15.9	9.7	8.5
2014	4,000	17.4	9.1	8.5
2015	4,000	16.7	8.9	8.3

A2.12 Conversely the retail, wholesale and vehicle repair sector remained relatively static at around 5,000 employees and about 21% of employment. . Although static this figure is above the national average of about 16% and South west average of about 17%. The third largest employer, health and social work (10.4% of jobs) remained largely static. The fourth largest sector education (9.4%) declined very slightly.

Take up of Employment Land

A2.13 Mid Devon District Council monitors permissions, commencements and completions of commercial land on an annual basis (MID03). This includes an assessment of all employment uses (Classes A,B, C2,and D). Figures 8 and 8A shows completions of Class “B” land since 2006. This shows an average take up of 1.02ha/5,690 sq m of employment floorspace per year. However, the monitor also indicates an upward trend in commencements of class B employment space since 2014, with nearly 3000sq m commenced in 2017-18, as shown in Figure 9.

Figure 8 Completions of Employment Land (Class B1, B2,B8)		
Year	Completed Area (ha)	Floorspace sq.m
2006-2007	2.557	2044
2007-2008	1.82	6854
2008-2009	1.8172	6425.07
2009-2010	0.345	6468
2010-2011	0.9345	5458.65
2011-2012	0.21	1839.6
2012-2013	0.752	2751.31
2013-2014	0.995	7943.62
2014-2015	1.543	13311.09
2015-2016	0.366	5072.22
2016-2017	0.36	3271.6
2017-18	0.56	6835.6
Total 2007-17	12.26ha	68,275
Average per year	1.02 ha	5,690
Source: Mid Devon District Commercial Land Availability Summary 2018.		

Figure 8(a) Completions of B1,B2 and B8 Floorspace

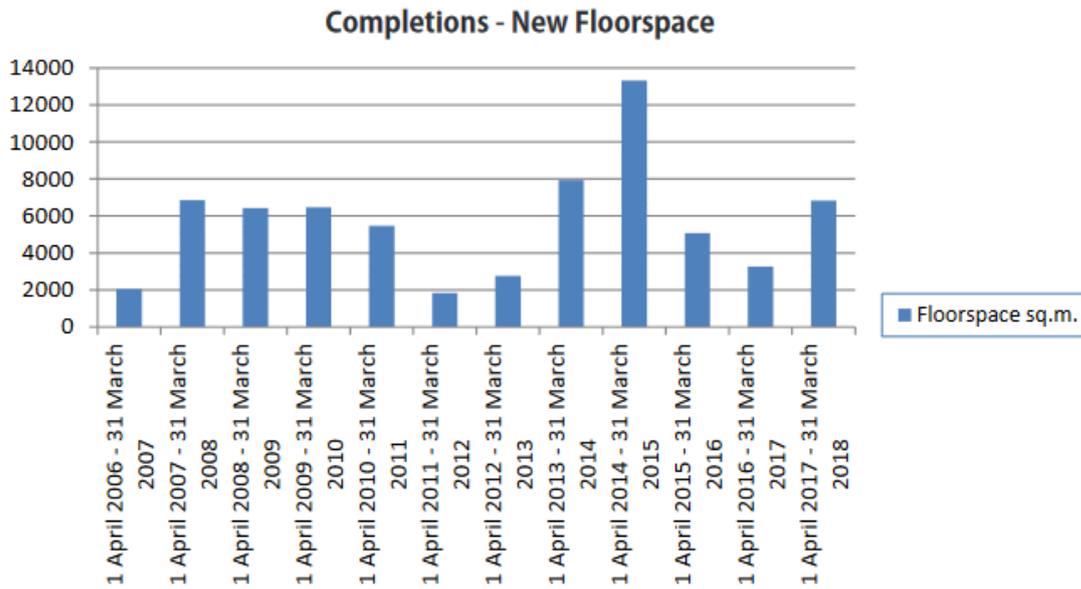
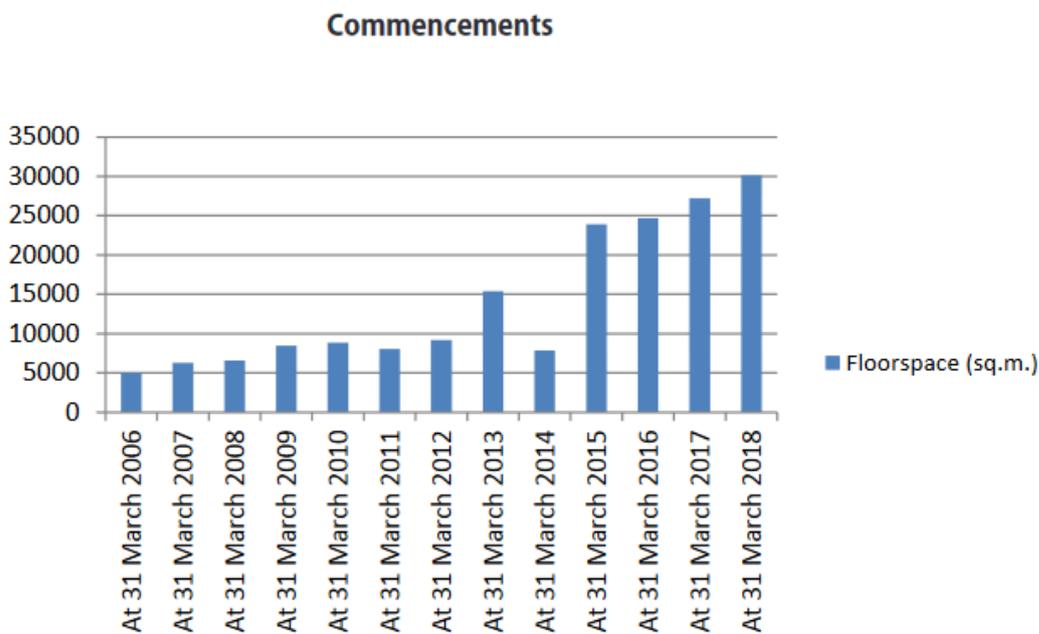


Figure 9 Commencements of B1, B2 and B8 Floorspace



A2.14 Figure 10 indicates that around 9,000 sq m of non Class commercial floorspace (Class A1-5, Class C1-2, Class D1-2 and sui generis uses) have been completed since 2013 (although this does not include losses), equal to about 1,790 sq m a year.

Figure 10 Non Class B Employment Floorspace Completions 2013-18		
	Area (HA)	Floorspace (SQ M)
2017/18	0.1	1342
2016/17	10.5	1160
2015/16	3.7	2070
2014/15	0.5	3661
2013/14	0.6	717*
Total 2013-18	15.4	8,950
Source Mid Devon Commercial Floorspace Monitors 2013-18		
*Only Class A1, A2 and D1 uses were monitored in 2013/14		

A2.15 A more detailed assessments of Mid Devon’s economy is provided in Chapter 3 of the Employment Land Review Update (2018) and more detailed assessment of permissions, commencements and completions of commercial land is found in the Council’s Commercial Land Monitor (MID09).

A3. Assessing the need for employment land

A3.1 Assessing the need for employment land is not a precise science. Assessments of employment land need through economic modelling tend to be “policy off” in that they ignore the implications of policy interventions.

A3.2 The Local Plan is underpinned by several reviews of employment land needs and supply. The emerging Plan’s employment space allocation was based initially on the Employment Land Review (G L Hearn 2013, ECO02). The employment land needs were reviewed and updated by Lichfields in 2018, which took account of recent forecasts (ECO09).

A3.3 The Local Plan has been prepared (and examined) at a time of considerable economic uncertainty, particularly regarding the impact of Brexit upon the local economy. Because of the numerous and countervailing considerations, it is considered appropriate to assume that all things remain equal, and present a positive approach to economic growth.

Mid Devon Employment Land Review, G L Hearn, January 2013 (ECO02).

A3.4 The Mid Devon Employment Land Review (ELR) was prepared by GL Hearn and published in January 2013. It considered a range of methods to assess the need for employment land (Use Class B1, B2 and B8) in Mid Devon. It does not assess the wider need for all employment, particularly in sectors not generally viewed as being within the “B2 Class sector.

3.5 The ELR’s forecasts range from 28-51 ha. The ELR’s headline recommendation is that the Local Plan Review should identify 30-40 ha of employment space between 2011-31 comprising:

- 5ha B1(a) and B1(b) office and high tech space
- 10ha B1(c) and B2 light and general industry
- 10-15 ha B8 storage and distribution.
- And other job creating uses to reach 30 – 40 hectares in total

The ELR assesses the need for land on the basis of:

- Labour demand (derived principally from econometric forecasts)
- Past take up rates of employment land development
- Labour Supply (taking account of planned housing provision and demographics)

- A3.6 **Labour Demand Scenario/Economic Growth.** The ELR is based on Cambridge Econometrics sectoral forecasts prepared in 2012 for DCC. Overall the CE forecast total employment to increase by 4,700 between 2011-26 in Mid Devon. The largest growth sectors are forecast to be construction and business services, with significant growth also in health, social services and IT. Primary industries such as agricultural and minerals are forecast to contract.
- A3.7 By assessing growth in different industries, whether this needs employment land and applying space standards, the ELR assessed a labour demand for 1,545 “Class B” employees (Fig 20) which would require 41,364 sq m (Fig 21) to accommodate. This equates to a gross requirement of 10.7ha, with an additional 4.5ha needed to compensate for the (actual and projected) loss of employment land between 2011-26. The ELR recommends adding a “frictional margin” of 10.1ha/5 years supply to support choice and competition (5.31). Factoring these requirements from 2026 up to 2031, the ELR assessed a labour demand forecast based requirement of 28ha between 2011-31 (5.37). It will be noted that this just relates to “B” space and not all commercial development.
- A3.8 **Past Completions Scenario.** Based on annual take up of B-Class floorspace 2005-11 of 8,538 sq m (around 2 ha), the ELR projected a 20 year forecast for 40.6 ha of employment land, again with a frictional margin of 10.1 ha (table 28)⁴. On this basis the take up rate scenario identified a need for 50.7 ha over the period 2011-31. This is above the Local Plan Review figure, but is a gross figure. The 2018 ELR Update suggests a slightly lower trend based need (see below).
- A3.9 **Labour Supply Model.** This approach considers the number of jobs needed to employ the workforce, having regard to matters such as demographic trends (a growing but ageing population), economic activity rates, jobs density and commuting patterns. The ELR notes Mid Devon’s ageing population. Cambridge Econometrics forecast an increase in 250 persons of working age (20-64) focused on Cullompton and to a lesser extent Tiverton by 2025. The labour supply model does not specify floorspace, but suggests that it will be less than the “baseline” scenarios noted above.
- A3.10 Drawing these approaches together, the ELR recommends that it is appropriate to plan for 30-40 ha of B space employment land between 2011-31 (para 5.50). The ELR suggested an oversupply (based on allocations at 2013), but noted that development management policies could see these coming forward as mixed use schemes (paragraph 8.9).
- A3.11 The 2013 ELR made recommendations as to the spatial distribution of employment land. The Local Plan review followed these closely, subject to the findings of the Strategic Commercial Land Availability Assessment (2014 –ECO04) and therefore they are described in Section 5 below. The Council considers that in the light of representations made on the emerging Plan and other issues arising that these locational recommendations remain robust. However because of the age of the 2013 ELR, it was considered appropriate to

⁴ It is noted that these figures are in part informed by pre-2008 data, which is one reason why the Council decided to re-assess the need for employment space in the 2018 update.

review the background evidence of need, which resulted in the 2018 ELR (ECO09) update carried out by Lichfields.

Employment Land Review Update, Lichfields April 2018 (ECO09)

- A3.12 Lichfields (then as NLP) carried out an interim assessment of economic forecasts in August 2016 primarily as part of their assessment of J27 for the Council (SSE16, 17). However, the 2018 ELR Update contains later economic forecasts and is specifically geared to advise on the need for employment space. Therefore the following concentrates on the 2018 report.
- A3.13 Lichfields were appointed by MDDC in late 2017 to update the evidence of need for employment space based on economic forecasts, past completions, and liaison with stakeholders such as local employers and the LEP (para 1.9). In particular, the Council's Economic Development Officers noted a discrepancy between some economic projections which suggested a fall in the manufacturing sector; which was at odds with recent growth in Mid Devon of the textile/food production sector and their experience of high demand for serviced industrial premises. (Explained more fully at pp 25-30 and paragraph 6.14 on p35 of the ELR Update).
- A3.14 Lichfields followed the same methodology as the 2013 ELR in assessing employment land requirements based on growth forecasts (aka labour demand), historic trends and labour supply.
- A3.15 **Forecast based projections** (labour demand). Lichfields commissioned updated forecasts of jobs growth between 2013-33. These provided an average increase of 6,090 jobs or 305 per year⁵. About 38% of these new jobs are projected to be in the "B" use class and 62% in the non-B sectors. All three forecasts projected a decline in industry (Class B1c and B2) but significant increase in B1a-b offices and distribution (B8). As noted in section 2, a large number of this forecast growth occurred between 2013-16, and there appears to be a significant growth in non-employee jobs. Lichfields' analysis indicates that Mid Devon's economic growth 2013-33 is likely to exceed both past performance (1998-2013) and national growth rates (see pp 36-41).
- A3.16 Lichfields applied these forecasts with floorspace ratios in the 2015 Homes and Communities Agency Employment Densities Guide, assuming 40% site coverage (1 ha of land yields 4,000 sq m employment floorspace) and a 10% buffer for market churn. They also considered the need to support key sectors and the Heart of the South West LEP's Strategic Economic Plan. The report also considers the need to apply a margin for flexibility and allowances for likely loss of existing stock. The loss of employment stock can arise from either conversion of out-dated buildings primarily for housing or the introduction of non-B class employment generating uses such as crèches and gyms into employment areas (see p49 of the ELR Update). These factors result in a wide range of forecasts of between 8-39 ha (table 6.21) although the ELR considers the mid to upper end of this forecast to be preferable (paras 6.72-3).
- A3.17 **Past Trends Scenario.** Lichfields also consider past completions based on MDDC's monitoring between 2006/7-2015/16. On average 1.13ha of land was developed per year

⁵ These are "jobs" not full time equivalents. The effect of this rate of growth on housing need is noted below and in the Housing Topic Paper. The forecasts are unlikely to reflect current market uncertainty.

(5,817sq m pa), although there as a slight slowdown post 2007⁶. Lichfields conclude that a trend based approach would translate to an employment land requirement of between 22.7-29.1 ha over the Plan period. However they advise that the trend based approach would not reflect suppressed demand arising from an historic lack of supply, which their qualitative analysis suggests may have occurred (Ch. 5 and para 6.61). The implication of this is that an increased supply of future land will be needed to enable the local economy to grow.

A3.18 Labour Supply Scenario Lichfields also consider the “labour supply” implications of the 2014 population projections: i.e. the needed number of jobs required to meet the supply of labour. They note that the 2014 based sub national population projections suggest a decline in the work force between 2014-33. However they note that the Local Plan promotes a growth rate above the demographically implied provision, and that the fall in the working age population will be offset by increased economic activity rates in older age groups. In addition a successful economic strategy will reduce the level of outwards commuting and increase the number of employee jobs (thus reducing the under-employment that appears to exist). These factors may dampen down the additional housing demand generated by economic growth. Nevertheless Lichfields recommend that these matters are kept under review to ensure that a shortage of labour does not constrain growth⁷.

A3.19 Lichfields’ Conclusions Lichfields conclude that different methodologies suggest a requirement for between 8-39 ha of employment (Class B) land, but recommend that a figure towards the upper end of range is needed to support economic development and the wellbeing of the local economy⁸. The ELR Update recommends that the Local Plan Review should make provision for between 30-40 ha B class employment space over the Plan period (para 6.73 and conclusions at pp54-5).

A4 Mid Devon Local Plan Review Policies on Commercial Development

Overall Strategy

A4.1 Policies S2 Amount and distribution of development and S6 Employment of the Local Plan Review propose 147,000 sq m of commercial floorspace. Its distribution is set out in Figure 12 below (and p32 of the Local Plan Review). The distribution broadly follows the proposed level of housing growth in Policy S2. There is slightly less employment growth proposed in

⁶ Note that this assessment was carried out on the basis of data available at 2017.

⁷ This is discussed further in the Housing Topic Paper and Edge Analytic’s report. Mid Devon Demographic Scenarios Policy–on update August 2016. <https://www.middevon.gov.uk/media/206859/mid-devon-policy-on-scenario-update-final-v3-august-2016-2.pdf> Edge Analytics assessed the impact of changes to economic activity rates, reduction in unemployment rates and reduced out-ward commuting, in the context of Junction 27. They consider the effect of State Pension Age and Office of Budget responsibly economic activity rates amongst older people. They also assess the impact of falling unemployment rates to a pre-recession rate of 2.8%. These assumptions would result in a larger workforce than the raw household projection. In addition, the Local Plan Review proposes more housing growth than the 2014 (or 2016) based Household Projections. Edge Analytics assess a range of jobs led scenarios, including the need to provide additional housing to accommodate labour demand from Junction 27, and indicate that taking a mid-point figure of 393 dwellings per year is an appropriate response to the inherent uncertainty entailed in economic forecasts. In response to these, the Local Plan Review proposes 260 additional dwellings to accommodate additional demand arising from Junction 27.

⁸ The Council note that a trend based approach alone would indicate a need for over 20 ha net new land over the Plan period. Lichfields’ figures relate to Class B space and not all commercial floor space. Therefore, whilst the Council agrees with Lichfields’ overall conclusions, the lower figure in the range would constrain economic prospects.

Tiverton although this is compensated for by the J27 proposal. There is proportionately more employment proposed in the rural areas than housing which reflects a high level of rural committed sites and also the ELR's recommendations and findings of the Strategic Commercial Land Availability Assessment (2014).

Figure 11 Amount and Distribution of Development (Policy S2 with percentages)				
Location	Total commercial floorspace (Sq m)	Percentage of requirement	Total residential (no.)	Percentage of requirement
Tiverton	29,400 m	20%	2,358	30%
Cullompton:	73,500	50%	3,930	50%
Crediton	14,700	10%	786	10%
Rural Areas	29,400	20%	786	10%
Total	147,000		7860	

- A4.2 Broadly this comprises 140,000 sq m commercial space aimed at meeting the ELR's recommendations for B space, and 7,000 sq m of retail or related uses. However Policy S6 includes all types of job generating uses, and is wider than narrowly defined Class B space.
- A4.3 An additional 42,550 sq m is proposed at Junction 27 of the M5 to provide high quality leisure and tourism development intended to stimulate the tourism economy. This is additional to the figure in Policy S2 and has been the subject of separate evidence from the Council.
- A4.4 The Local Plan makes provision for provides allocations for up to a maximum of 212,416 sq m of commercial floorspace. (Without j27 the figure is 169,866 sq m). This is made up of:
- 9,787 sq m completions 2013-16 (4.6% of total)
 - 43,259 sq m committed sites at 2016 (20.4% of total)
 - 159,370 sq m local plan allocations (including 42,550 sq m at Junction 27). (75% of total).
 - 212,416 sq m total.
- (See p28 of the Local Plan Review).
- A4.5 Updating these figures to 2018/19 the figures are:
- 36,434 sq m completions 2013-18 (17.15% of total)
 - 67,118 sq m committed sites at 31/03/2018 (31.6% of total)
 - 108,865 sq m not committed local plan allocations (including 42,550 sq m at Junction 27). (51.25% of total)
- (See p28 of the Local Plan Review and the 2018 Commercial Land Summary, MID09). The detailed permissions are set out in the Appendix to MID09. The most significant permissions are: Tiverton Eastern Urban Extension (22,000 sq m), South of Kingsmill Road, Cullompton (6.2ha) and Venn Farm, Cullompton, (12,000 sq m). These are Local Plan Review sites and show development identified in the Plan for development coming forward.
- A4.6 The provision for 212,414 sq m is about 65,400 sq m more than the minimum figure needed, but is justified to provide choice and because some sites may provide less than 40% site coverage. The 2018 Employment Land review update confirms the appropriateness of allocating 30-40 ha (circa 140,000 sq m) of Class B employment land in the Plan, and 7,000 sq m of town centre retail uses; whereas the Local Plan allocations are for a complete range

of employment uses including care homes and supported accommodation⁹. As noted above, business parks /employment estates frequently include some non-class B employment uses such as crèches, gyms, clinics, Class A2 services etc., as well as de-facto “trade counter” type retail uses¹⁰.

A4.7 The location of the Local Plan Review’s floorspace allocations is set out on p43 of the Plan and reproduced here as Figure 12 (note that this reflects the submitted plan position, not the updated position at 4.4 above).

Figure 12 Local Plan Review Employment Allocations						
Location	Site	Policy	Gross site area (ha)	Net site area (ha)	Broad floorspace(sq m)	page
Tiverton-	Eastern Urban Extension	TIV1-5	153	6	30,000	66-75
Tiverton-	Phoenix Lane	TIV12	1.4	1	7,000	79-80
Cullompton	North West Urban Extension	CU1-6	95	3	10,000	88-96
Cullompton	East Cullompton	CU7-13	160	5	20,000	97-106
Cullompton	Week Farm	CU18	10.7	8.7	15,000	110-111
Cullompton	Venn Farm	CU19	4.4	2.5	12,000	111-112
Crediton	Wellparks	CRE1	22.9	1.2	2,220	118
Crediton	Land south of A377	CRE10	1.9	1.9	7,600	126
Junction 27	Junction 27	J27	71	28	42,550	128
Bampton	Stone crushing works (Scotts Quarry) Bampton	BA2	0.45	0.36	355	
Willand	Willand Industrial Estate	W12	9.2	9.2	13,000	151
				66.86	159,725 ¹¹	

A4.8 Figure 13 reproduces the Local Plan Review’s commercial trajectory (p29).It is expected that employment land will arise from a range of locations including urban extensions in Tiverton in the short-medium term (which is evidenced by permissions coming forward on the Eastern Urban Extension). Cullompton is likely to provide an ongoing supply throughout the Plan period and beyond: Week Farm (CU17) and Venn Farm (CU18) are likely to deliver in

⁹ Policies CU1(c) and CU7(b) and (d) propose extra care/retirement accommodation as part of the commercial mix at Cullompton. The distinction between Class C2 care home and C3 dwelling has become increasingly blurred. However, specialist accommodation for older people may be counted as part of 5 year supply irrespective of use class. Some accommodation will house people defined by ONS as part of the household population, whilst new Class C2 care homes are likely to release dwellings elsewhere (PPG 3-043-20180913).

¹⁰ This is a statement of fact and not a policy prescription.

¹¹ In addition to the 159,370 sq m there were 9,787 sq m completions, and 43,259 sq m commitments).

the shorter term, whereas the urban extensions may require Junction 28 improvements. Employment provision at Junction 27 is expected to be built out during the early-mid 2020s.

Figure 13 Local Plan Review Trajectory of Commercial Development

Overall Trajectory of Commercial Development

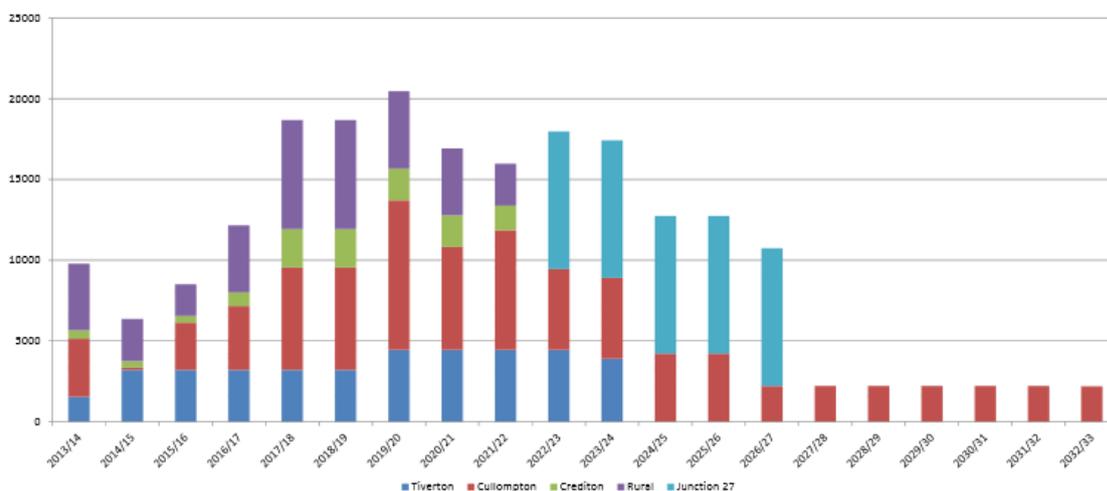


Chart 2: Overall commercial development trajectory

Location of employment allocations in the Local Plan review

- A4.9 The Local Plan Review draws upon the 2013 Employment Land Review's recommended distribution of growth (see A3.5 above). Sites were assessed through a Strategic Commercial Land Availability Assessment ((SCLAA). EC04 (a-c) which was published in December 2014. Commercial development is distributed in a broadly similar way to housing growth as recommended by the ELR, but governed by considerations of suitability availability and achievability as assessed by the SCLAA.
- A4.10 This was not reassessed by the Lichfields 2018 update, although delivery has been kept under review through monitoring and the development management of sites such as Tiverton Eastern Urban Extension. More details on the likely town specific nature of proposals can be found in the individual town Proofs of Evidence. These set out delivery mechanisms for the urban extensions, such as Masterplans and draft equalisation agreements.
- A4.11 Geographically, the 2013 ELR recommends provision of around 10ha of employment land in Tiverton, focused upon the immediately accessible A361. This is taken forward in the Local Plan as part of Policy TIV1 Eastern Urban Extension. **Policy TIV 1** proposes the provision of at least 30,000 sq m of commercial floorspace (22,000 sq of which has outline permission). The ELR recommends that the existing Tiverton Business Park should be protected, but was considered to offer limited future development potential. This is supported by the Eastern Urban Extension masterplan (SSE01a)
- A4.12 **Policy CU1** proposes 10,000 sq m of mixed commercial floorspace at North West Tiverton, although the Policy envisages that a substantial amount will be non-B class floorspace, such as a care home, leisure or tourism. **Policy CU7** proposes 20,000 sq m of commercial floor

space at East Cullompton, (with a further 12,000 sq m post 2033) although the Policy envisages that this would include retirement accommodation and/or tourism development as well as “B” Class space.

- A4.13 The ELR recommended a focus on Kings Mill Industrial Estate, east of the M5 for the bulk of Cullompton’s Class B employment provision, making the most of accessibility to the M5. These are taken forward as Policies CU17 and CU18 in the Local Plan Review. **Policy CU17** proposes 15,000 sq m employment (Class B2- B8) land at Week Farm. **Policy CU18** proposes 12,000 sq m of employment (Class B1-B8) at Venn Farm. Both sites are close to the existing Kings Mill Industrial Estate with good accessibility to Junction 28. Venn Farm has detailed planning permission (09/01573/MOUT, 16/01289/MARM and 18/00380; see 7.2-7.3 of the Cullompton Proof Of Evidence Hearing 2 Issues 3-4).
- A4.14 In Crediton, the protection and upgrading of Lords Meadow Industrial Estate and retention of an allocation for 1.5ha at Wellparks are recommended by the ELR. **Policy CRE1** proposes 2,220 sq m of commercial floorspace as part of a mixed use allocation on 22.9 ha at Wellparks, on the south east side of the town close to the train station. The policy recognises the need for development to respect historic environment and drainage constraints. **Policy CRE10** allocates around 7,600 sq m of employment (Class B or other suitable commercial use) south of the A377, drawing from the largely built out allocations in the previous Plan, although the policy notes that the achievability of the full allocation is dependent upon project level flood risk assessments.
- A4.15 In addition to considering potential to create employment space with the main towns and Junction 27; the ELR also recommended policies to support small, rural and home based businesses, both through the provision of small sites and allowing for homeworking opportunities. **Policy W12 Willand Industrial Estate** proposes around 22,000 sq m on 9.2 ha of Class B1, B2 and B8 uses at Willand, as part of a larger allocation in the previous Plan, that has been partly built out. The allocation has been expanded as a modification to the emerging Plan to recognise the site’s good links to the M5 and provide a range of different units including a B8 distribution units (see paragraph 3.238 p151 of the Plan). The Plan includes smaller allocation in the villages, including a now largely developed 2.4 ha mixed use allocation at Bampton (**BA2**). The SCLAA investigated a number of additional rural sites for purely commercial development but found them unsuitable (see Appendix 1 p7 of ECO4(b) which summarized the detailed site assessments in ECO04(c).
- A4.16 Whilst other village designations are residential, they could come forward as live/work or similar developments subject to other planning considerations. **Policy DM18** supports rural employment development, subject to highways, scale and other considerations. Policies **DM9** and **DM18** set a preference for re-use of existing rural buildings where available and suitable. The Plan provides a positive policy framework to support a prosperous rural economy, and focuses rural development on existing settlements and buildings as far as possible.

Non B Uses

- A4.17 Whilst much employment growth is likely to be in the non “B” sector (the forecasts above suggest up to 60%), it is more difficult to assess floorspace requirements for these jobs. Some non B sectors are likely to be accommodated as part of mixed use developments on commercial allocations, in other premises or though home and peripatetic working.

Homeworking does not usually require planning permission, and the Council is working with providers to ensure rollout of superfast broadband coverage.

- A4.18 The ageing population is likely to require an increase in health/ social service provision, met either in exiting healthcare facilities or through peripatetic working. As noted above, Policies CU1 and CU7 anticipate that the commercial allocations will provide an element of retirement/care accommodation. This could also boost the housing numbers by several hundred. At March 2018 there was planning permission for 10,114 sq m of Class C2 Floorspace.
- A4.19 **Education** The Local Plan's growth rate is likely to result in a need for additional school places¹². Some of this will be met in existing schools. **Policies Tiv1(g), TIV4a), Tiv5(d-f)** set out requirements for a new primary school serving the Eastern Urban Extension of Tiverton. **Policies CU1, CU4 and CU6 g)** provides for a primary school at North West Cullompton. **Policies CU7, CU10 and CU12g)** require land for a new primary school and other contributions for East Cullompton. **Policy CRE11** proposes to use developer contributions to expand and improve school facilities in CREDITON.
- A4.20 **Retail.** The issues around Junction 27 have been set out in evidence considered in the Preliminary Hearings. Mid Devon's main retail need was assessed in the **Retail Study GVA 2012 (ECO03)**. This was prepared in by GVA to assess Mid Devon's retail position and viability, to advise on need and demand for floorspace and provide a sequential assessment of potential locations. It also reviewed town centre boundaries and advised on retail led regeneration opportunities. Tiverton was confirmed as the largest and most successful retail centre.
- A4.21 A qualitative and quantitative need for around 6,400 sq m comparison retail was identified to 2026. The Study identified an expanded sites identified in the Core Strategy at Phoenix Lane and other sites within Tiverton town centre as the sequentially preferable locations for this floorspace. .
- A4.22 Much more limited capacity for additional floorspace was identified in Cullompton and CREDITON. The Study ran to 2026 (i.e. 8 years before the end of the Plan Period) and is therefore likely to represent a conservative figure for retail capacity. However the sites identified in the Plan (see below) remain the sequentially preferable and allow for a range of commercial and specialist accommodation uses to come forward. The qualitative capacities identified by the Study are set out in Figure 14.

Figure14 Identified Retail Capacity Retail Study, GVA 2012).

Convenience Retail Capacity (Sq m)		
	2021	2026
Tiverton	218	577
Cullompton	273	399
CREDITON	-974	-784

¹² The calculation of school place need is carried out by Devon County Council. Population projections suggest an ageing population. However applying DCC's figures of schools per homes (0.25 Primary aged pupils (aged 5-11), 0.15 Secondary aged pupils (12-16) 0.06 further education (17-18) , DCC,2016) would imply a need for 1965 primary school children, 1,180 secondary school pupils and 472 further education students.

Comparison Retail Capacity (Sq m)		
	2021	2026
Tiverton	4013	6392
Cullompton	-323	-193
Crediton	-264	280

- A4.23 **Policy TIV12 Phoenix Lane** proposes 7,000sq m of mixed retail, leisure and retail floor space as part of a wider redevelopment scheme of this 1.4 ha town centre site. The policy also proposes residential development. **Policy CU10** proposes 2 ha of mixed use shopping and community uses at East Cullompton. **CU20** proposes a variety of regeneration projects in Cullompton, which are likely to include retail, library, health care and other employment-yielding uses.
- A4.24 Policies **S7, DM14** and **DM15** direct retail development towards town centres, reflecting the town centre first approach in both iterations of the NPPF. **Policy DM17** supports appropriately sized retail development in and adjacent to defined villages.
- A4.25 As noted, the GVA assessment of need does not cover the entire Plan period and evidence of the uplift in capacity, sequential and impact testing is set out in the evidence behind **Policy J27**.
- A4.26 **Tourism** is recognised as an important driver of the Mid Devon’s economy. Although about 5% of jobs in Mid Devon are directly tourism related, the sector is smaller than in the rest of Devon. The **Mid Devon Tourism Study G L Hearn** (November 2014, ECO05) was produced to give advice on the tourism offer and indicate ways that it could be developed to enhance economic growth. Mid Devon is a gateway to significant attractions including Exmoor, Dartmoor, North and South Devon Coasts, Cornwall and Torbay. A major issue identified by the Study was that too much potential spending was passing through the district on the M5, A361 and mainline railway, and there is a need to create a “critical mass of things to stop for”. This would have spin off benefits for other local attractions and accommodation. Further evidence is presented in relation to the Policy J27.
- A4.27 Mid Devon’s Destination Management plan (2017) identifies three areas which need to be developed in the area:
- Working in partnership – a need for clear leadership and co-ordination
 - Clear branding – to create an identity for Mid Devon
 - Creating a competitive product – by improving the visitor experience & develop the local offer
- It also identifies the importance of natural capital i.e. the importance of the countryside and opportunities to promote nature and food related tourism.
- A4.28 **Policy DM 22** promotes tourism and leisure development within defined settlements, and elsewhere subject to transport and impact considerations.
- A4.29 **Agriculture:** Agriculture is a very significant part of Mid Devon’s economy. As set out above it accounts for 8% of direct employment and an estimated 18.5% of all jobs are in agriculture or related industries. Whilst much agricultural development does not need planning permission, **Policy DM 20** sets out considerations relating to agricultural development (where permission is needed), and **Policy DM21** deals with equestrian development. As

described in the previous sections, Policies DM17 and 18 deal with rural retail and employment. Policy DM22 Tourism and Leisure development may also be applicable to farm diversification.

A5. Conclusions

- A5.1 The Plan sets out a positive framework for economic growth, consistent with the requirement in the NPPF to build a strong and competitive economy and meet objectively assessed needs. The Plan follows a strategy recommended by the Employment Land Review and Strategic Commercial Land Availability Assessment, with minor adjustments. This represents the most appropriate strategy for the area based on proportionate evidence. The policies are flexible and deliverable.
- A5.2 The Plan is based on a range of proposals including bringing forward employment land as part of mixed use urban extensions. Whilst a buffer is provided above identified need when assessed on the basis of economic forecasts for B space, it is anticipated that these allocations will be delivered as mixed use areas. The Council considers that mechanisms in place such as masterplans will ensure that such proposals are deliverable.
- A5.3 Assessment of recent economic growth both in terms of floorspace delivered and jobs created show Mid Devon's manufacturing sector perform strongly, and outstripped the performance projected by national trend based forecasts. Textile and food manufacturing particularly are an important element in the local economy, which are arguably underplayed by "policy-off" economic forecasts. However there remains an issue of low job density due to outward commuting, and most of the jobs that have arisen post 2013 have been non-employee jobs representing an increase in self-employment and potentially under-employment.
- A5.4 The Local Plan identifies a requirement for 147,000 sq m (equal to about 35ha based on 40% site coverage) for employment needs, plus the J27 allocation. Whilst the allocations in the Plan exceed this requirement, Local Plan Policy S6 makes clear that this allocation is for a range of employment uses. Detailed policies in the Plan indicate where there are constraints such as historic environment considerations or flooding issues that may prevent 40% site coverage being achieved.
- A5.5 The Plan promotes higher than demographically implied level of housing provision, particularly as a response to J27, in order to provide the likely labour needs to support economic growth. As such the balance between commercial and housing development is a sound approach.
- A5.6 Junction 27 is promoted in the Plan as a major opportunity to improve the tourism offer of Mid Devon and capitalise on the large number of people who pass through the district.
- A5.7 The Plan also contains appropriately worded policies which support the rural economy both in terms of agriculture and rural diversification, subject to appropriate environmental safeguards. It also supports home working and the regeneration of town centres.

Appendix 2 Representations to the proposed Submission Local Plan

- A2.1 The issue of employment land per se. was not a significantly controversial matter in the Local Plan review's representations. Most of the representations received on the Proposed Submission Plan (incorporating Modifications) on employment matters were either in relation to objectively assessed need for housing (Policy S2) or objections concomitant to Junction 27.
- A2.2 The Council has acknowledged that there is a case to plan for a buffer above the demographically implied provision in order to ensure that there is a sufficient workforce to meet labour demand. This is discussed in the housing topic paper. However, Mid Devon currently has a very low job-density and the plan seeks to improve the district's own economic performance rather than developing as a satellite of Exeter. The economy has performed strongly since 2013, in part because of bounce-back from the recession, but most jobs created appear to have been self-employed jobs.
- A2.3 There were 9 representations to Policy S6 in the 2017 consultaion: 1 in the context the promotion of Junction 27, 2 in the context of objections to Junction 27. Three were in the context of supporting other site allocations. Three representations (from Parish Councils or associated people) argued for the provision of higher value (Class B) jobs. There were no objections to Policies DM18, DM19, DM20, DM22 relating to rural employment, agriculture, tourism etc.
- A2.4 A full assessment of representations made on the Plan, and the Council's response is set out in document SD11; and on the 2015 Consultation in document SD14.