

# **Mid Devon Local Plan Review 2013-2033 Examination**

Matter 1: Vision, Spatial and Development  
Strategy, and Strategic Policies

Thursday 14<sup>th</sup> February 2019

Devon County Council Position Statement

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## 1. Introduction

### 1.1. Purpose of this Statement

1.1.1. This statement has been prepared to answer questions 2, 3 and 4 as posed by the Planning Inspector in relation to matter 1 (Vision, Spatial and Development Strategy, and Strategic Policies) for the Mid Devon Local Plan Review 2013-2033 Examination. The questions are:

- Is the OAN of 7,860 (or 393 dwellings pa) (and thereby Draft Policies S2, S3 and S4) correct?
- Is the spatial distribution of housing soundly based in the light of possible alternatives?
- Will the spatial distribution of housing be effective, given questions about viability?

1.1.2. It should be noted that this statement does not cover all of the questions raised by the Planning Inspector in relation to matter 1 but focuses upon those issues in which Devon County Council (DCC) has a specific interest in order to fulfil its statutory responsibilities (i.e. as the Highways and Education Authority).

## 2. Is the OAN of 7,860 (or 393 dwellings pa) (and thereby Draft Policies S2, S3 and S4) correct? (Q2)

2.1.1. DCC undertakes demographic forecasting and housing projections to support its wider functions and services and to inform the assessment of infrastructure planning for which the Authority is directly responsible. Such assessments are undertaken at a strategic level and can be expressed for specific Housing Market Areas (HMAs).

2.1.2. The demographic modelling and housing projections produced by the county council have been used as a starting point to inform the OAN set out in the Local Plan. The approach used in developing these trend-based projections has been set out fully in evidence document *HOU03: Strategic Housing Market Assessment (SHMA) Final Report (2015)*, notably Appendix VI of that report.

2.1.3. The DCC trend-based projections presented in the SHMA are based on CLG household formation rates from 2008 and interim rates for 2011 as these were the most up to date datasets available at the time the report was produced. In order to ensure the evidence base was up to date in advance of submitting the Plan, Edge Analytics updated the demographic scenarios which took into account proposals at J27. The findings from this update are presented in evidence document *SSE14: Demographic Scenarios: J27/Westwood 'policy on' sub scenario update August 2016*.

2.1.4. As part of this work, an updated version of the DCC trend-based projections were prepared. These updated projections incorporated the latest ONS data

including fertility and mortality rates, an updated migration trend period and the 2014 based CLG household formation rates. An overview of the updated projections and their implications is set out in Appendix 2 of *TPA01: Housing Topic Paper*. Various 'policy on' scenarios were then developed to consider the impact of jobs led growth in the district and identify the OAN.

- 2.1.5. It is inevitable that projections and baseline data becomes out of date as time passes and new datasets become available. However, the Councils have endeavoured to undertake necessary updates when appropriate to ensure a robust and sound evidence base to inform the Local Plan. The county council believes that the methodology undertaken to establish the OAN is correct and in accordance with the NPPF and relevant sections of the NPPG.

### **3. Is the spatial distribution of housing soundly based in the light of possible alternatives? (Q3)**

- 3.1.1. The trend-based housing projections produced by the county council has not considered the distribution of housing demand or need at a local level. Instead this has looked at housing numbers at an HMA and district level.
- 3.1.2. Strategic development distribution is however of primary concern to the county council in its role as Highway Authority and the achievement of its wider transportation policy objectives. On a strategic level impacts of the proposed distribution strategy have been assessed and appropriate transport infrastructure improvements have been identified. These have been included in evidence document *SOC04: Infrastructure Plan 2016* and appropriately incorporated to policies throughout the Local Plan. As such we are content that the spatial distribution strategy is soundly based in terms of strategic highway provision.

### **4. Will the spatial distribution of housing be effective, given questions about viability?**

- 4.1.1. The NPPF sets out that in order for the Local Plan to be effective it should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. We understand that concerns have been raised regarding the viability of some of the infrastructure necessary to support the delivery of some of the strategic allocations, notably the new motorway junction required to support proposals in Cullompton.
- 4.1.2. It is acknowledged that at this stage a substantial funding gap exists and a range of funding sources will need to be secured in order to support the delivery of infrastructure. This is a common situation to be in at a Local Plan examination. The county council has a proven track record of securing external funding sources towards major road schemes in recent years, this includes:
- £11 million secured from the Department for Transport for improvements to M5 Junction 29, including new junction layout to provide for all movements and capacity to accommodate development at Cranbrook and East of Exeter Growth point.

- £76 million secured from the Department for Transport towards the delivery of the £110 million South Devon Link Road, which opened in 2015.
  - £83 million awarded by the Department for Transport in May 2018 towards a £93 million scheme to improve the A361 and A39 North Devon Link Road between South Molton and Bideford.
- 4.1.3. Funding has already been secured and used to deliver infrastructure necessary to support the Local Plan, notably phase one of the new A361 junction serving the Tiverton EUE. This includes £1.44 million from National Productivity Infrastructure Fund (NPIF) and £1.19m from LEP Local Growth Fund.
- 4.1.4. Housing Infrastructure Fund (HIF) bids have also been submitted and progressed through the first round of assessment for funding towards phase 2 of the EUE junction and a significant proportion of the Cullompton Town Centre Relief Road. Taken together this totals £18.2 million of potential funding which could be secured.
- 4.1.5. This proactive approach will continue following the adoption of the Local Plan to ensure that all potential opportunities to secure external funding sources are maximised. A notable potential funding opportunity is the Road Investment Strategy (RIS3), for which bids will be available in 2023/24.
- 4.1.6. The county council supports the exclusion of education provision from the proposed CIL 123 list for development relating to Tiverton Eastern Urban Extension, North West Cullompton and East Cullompton. The ability to secure S106 contributions towards these new schools increases the ability to fund their delivery, and the revision to the CIL regulations also improves flexibility.

## **4.2. Summary of DCC position**

- 4.2.1. The county council supports the approach which has been adopted by Mid Devon District Council in establishing the OAN. The approach has used an appropriate methodology which is consistent with the NPPF and relevant parts of the NPPG. We believe the spatial distribution of development is soundly based and will be effective. We will work collaboratively with Mid Devon District Council and key partners such as Highways England to secure necessary infrastructure funding and ensure the delivery of sustainable development.