



**MID DEVON LOCAL PLAN REVIEW 2013 – 2033**

Proposed Submission (incorporating proposed modifications) Examination

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**Main Hearings - Hearing 1: Thursday 14<sup>th</sup> February 2019**

**Matters and Issues**

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

**Statement of Mid Devon District Council**

<b>ISSUE 1</b>	<b>Is the Vision and Spatial Strategy for the area a reasonable one, and does Draft Policy S1 work?</b>
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**1) Is the Vision and Spatial Strategy for the area a reasonable one?**

***Vision***

- 1.1 The Vision is a reasonable one for Mid Devon and is drawn from relevant evidence about the location, physical characteristics and issues affecting the district which is predominantly rural in nature. It includes positive statements to promote community well-being, support sustainable economic success, conserve and enhance the area and respect environmental limits. This positive approach is consistent with the first of the 12 core planning principles (page 17) in the 2012 NPPF.
- 1.2 The vision has been carried forward from the previous Core Strategy and continues to reflect the national policy provisions for sustainable development. It is consistent with the priorities for economy, homes, community and environment set out in the Council's Corporate Plan (**SOC06**). The vision has broadly been supported through consultation. It has been shaped through the stages of preparation of the local plan to include references that recognise the district's relationship with Exeter and Taunton, which are major growth centres, and to include support for sustainable travel modes, green infrastructure, reuse of buildings and renewable energy projects within environmental limits.

### ***Spatial Strategy***

- 1.3 The Spatial Strategy is a reasonable one for Mid Devon. It sets out a series of objectives affecting how development will be prioritised and managed across the district to meet the vision for sustainable development.
- 1.4 The Local Plan Review has involved a reconsideration of the development strategy for the plan area. The Spatial Strategy is based on an assessment of the most appropriate strategy to meet the objectively assessed needs for the plan area. It recognises environmental constraints at Tiverton and Crediton and the accessibility of Cullompton with potential for longer term growth to the east of this town. The Spatial Strategy provides for limited development at villages but avoids a wider distribution of housing which would risk significant increases in unsustainable travel.

#### *Summary and explanation for the spatial strategy*

- 1.5 In summary the Spatial Strategy provides for:
- Cullompton to become the strategic focus of new development,
  - Tiverton and Crediton to be the secondary focuses of new development,
  - A network of villages for limited development,
  - Some targeted development in the countryside, and for
  - Junction 27, M5 Motorway to provide a high quality tourist and leisure focused development.
- 1.6 An explanation for the spatial strategy is provided in paragraph 1.16 (page 13) of the Local Plan Review (**SD01**).

#### *Cullompton – strategic focus of new development*

- 1.7 The Spatial Strategy makes clear that in the medium to long term Cullompton will become the strategic focus of new development reflecting its accessibility (to the M5 motorway and potential for a new railway station on the Great Western mainline), economic potential and environmental capacity. The Council's hearing statements for Hearing 2 make clear how significant potential infrastructure constraints to growth at Cullompton will be overcome, including improvements to the M5 motorway and Junction 28, public transport improvements, town centre relief road and measures to reduce flood risk in the area. A Statement of Common Ground is being prepared with site promoters for allocated land east of Cullompton that provides greater certainty for development to come forward as set out in the Local Plan Review policies for the town.

#### *Shift of strategic growth away from Tiverton*

- 1.8 The Spatial Strategy marks a shift in emphasis for strategic growth away from Tiverton (which is the largest town and administrative centre for Mid Devon). This is justified given physical and environmental constraints affecting opportunities for planned urban extensions to the town and land not being available for development north of the A361.

*Crediton and rural areas*

- 1.9 Crediton is similarly affected by physical and environmental constraints and will be subject to more modest planned growth, while provision is made for limited development at 22 identified villages and for targeted development in the countryside to meet local need.
- 1.10 Further information about the main towns, the villages and rural areas is provided in the Council's hearing statements for Hearing 2 and Hearing 3.

*Junction 27*

- 1.11 The Spatial Strategy was updated through proposed modifications made to the Submission Plan (January 2017) to include reference to planned high quality tourist and leisure focused development at Junction 27, M5 Motorway. Junction 27 proposals have been the subject of preliminary hearings held in September 2017 for the examination of the Local Plan Review and where the Inspector has subsequently reported that he sees 'no in principle' difficulty with this allocation (**ID08**).

*Preparation of the spatial strategy*

- 1.12 The development of the Spatial Strategy for the Local Plan Review has been underpinned by core land use planning principles set out in the 2012 NPPF paragraph 17. The Spatial Strategy is supported by the findings of technical studies and other evidence, through the outcome of extensive public consultation through the stages of the preparation of the Local Plan Review, and through Sustainability Appraisal.

*Core land-use planning principles in the 2012 NPPF*

- 1.13 The Spatial Strategy is underpinned by core land-use planning principles in the 2012 NPPF where it:
- Has been shaped and chosen by Local people empowered through public engagement on the plan making process.
  - Takes account of the different roles and character of different areas,
  - Focuses significant development in sustainable locations and makes the fullest possible use of public transport, walking and cycling,
  - Will proactively drive and support sustainable economic development to deliver homes, business, infrastructure and create thriving places.

*Supported by technical studies and other evidence*

- 1.14 The Spatial Strategy is based on extensive published evidence used to inform the preparation of the Local Plan Review. This includes, amongst other reports:
- Strategic Housing Land Availability Assessment (SHLAA) (**HOU1**)
  - Strategic Housing Market Assessment (SHMA) (2014/15) (**HOU2**) (**HOU3**)
  - Gypsy and Traveller Accommodation Assessment 2015 (**SOC02 & SOC03**)
  - Strategic Commercial Land Availability Assessment (SCLAA) (2014) (**ECO04**)

- Employment Land Review 2013 (**EC02**) and update 2018 (**ECO09**)
- Tourism Study 2014 (**ECO05**)
- Devon County Council Community Infrastructure Report 2015 (**SOC01**)
- Infrastructure Plan 2016 (**SOC04**)
- Viability Assessment (2014) (**HOU4 & 5**) and update 2016 (**HOU6**)
- Independent review of the financial viability study (2017) (**ECO08**)
- CIL viability update (2018) (**HOU07**)
- Rural Diversification Study (2006) (**ECO07**) and update 2012 (**ECO06**)
- Strategic Flood Risk Assessment (2014) (**ENV08 & ENV09**)
- Agricultural Land Classifications (2015) (**ENV15**)
- Historic Environment Appraisal (2016) (**ENV25**)
- Air Quality Assessment (August 2014) (**ENV10**)
- Landscape Character Assessment (2011) (**ENV16**)
- Landscape and Visual Appraisal (2014) (**ENV05**)
- Open Space and Play Area Strategy (2014) (**ENV06 & ENV07**)
- Habitat Regulations Assessment (2015) (**ENV02**), (2016) (**ENV03**) and J27 HRA (**ENV04**)
- Strategic Highway Options Report (2014) (**ENV12**)
- Preliminary Transport Position Statement (December 2016) (**ENV13**)
- Green Infrastructure Assessment 2013 (**ENV14**)

1.15 The evidence base for the Local Plan Review also includes more detailed technical work for the main towns and strategic site allocations (including examination documents **SSE01 – SSE19** and others) that will be referred to in the Council’s relevant hearing statements for those places.

1.16 The evidence base satisfies the requirements of the 2012 NPPF paragraph 158. It is adequate, has been kept up to date where needed and is relevant in terms of the economic, social and environmental characteristics and prospects of the area. The evidence base is robust and proportionate for developing a spatial strategy for the Local Plan Review.

*Supported through public consultation*

1.17 The Spatial Strategy taken forward in the Local Plan Review has received the most support through public consultation as it has been revised through the stages for the preparation of the Local Plan.

1.18 ‘Options’ consultation (2014) (**OCP01**) put forward the following options for the distribution housing development:

Option 1 – town focus. Focus development in Tiverton, Cullompton and Crediton with limited development in other settlements.

Option 2 – new community. Focus development in Tiverton, Cullompton and Crediton over the first part of the plan period. At a later stage, development of a new community or expansion of an existing settlement with good links to the M5.

- 1.19 Both options 1 and 2, provide for some limited development in villages. Two potential sites were put forward for the new community/settlement expansion, effectively giving two sub options for Option 2:

2a. North of Willand, providing links to M5, junction 27.

2b. East of Cullompton, with improved links to M5, junction 28.

Both sites were found to be achievable via the SHLAA process.

Feedback on the options for policy S3 indicated a general acceptance of the need for new housing, especially affordable. There was a mixed response on the level of development in and around villages.

- 1.20 299 respondents commented on the two strategic policy options, with preferences stated for either option or another alternative breaking down as follows:

Option 1	Option 2 (a or b)	Other
30%	52%	18%

- 1.21 414 respondents made comments on the options for the location of a new community. The table below indicates a breakdown of those that supported and objected to each option.

Location of New Community	Support	Object
Option 2a: Willand/M5 Junction 27	46%	54%
Option 2b: Cullompton/M5 Junction 28	93%	7%

- 1.22 The following table summarises the key comments from respondents who supported or opposed the options for policy S3 at the Options Consultation stage.

Policy S3 Option	Support	Object
<b>Option 1 (Town Focus)**</b>	Regeneration of towns and boost to local economy; most sensible option in terms of existing facilities and infrastructure; well connected to existing transport network; maximise opportunities for sustainable travel.	Objections focused on the proposed site at Hartnoll Farm, in particular the impact on the landscape and existing communities, notably the village of Halberton.

<b>Option 2a (New Community Willand/J27)</b>	–	Sustainable location, well connected; good location for future business investment.	Landscape impact on ‘gateway’ to Devon; impact on existing communities.
<b>Option 2b (New Community Cullompton/J28)</b>	–	Local community support: Cullompton Town Council see opportunity for regeneration of Cullompton. Relationship to existing town centre services and facilities; good transport links with opportunity to improve M5 junction 28; proximity to existing employment sites.	Highway capacity issues, improvements to junction 28 needed. Impacts on local businesses; flood issues; landscape impact.

\*\* Of those that supported Option 1, a number objected to certain sites within Tiverton including Hartnoll Farm.

1.23 The draft version of the ‘proposed submission’ of the Local Plan was produced in February 2015 and consulted on up to April 2015. This provided a final version of development amount and distribution strategy (renumbered policy S2) and further narrowed down sites in the options consultation. It took forward the option of a significant urban extension to the east of Cullompton. While Tiverton would continue to expand with the Eastern Urban Extension and some development would come forward in Crediton, Cullompton will play the central role in meeting the district’s long term development needs. Consultation feedback and new evidence, including the 2015 SHMA has helped inform this decision.

1.24 Some of the key aspects of the consultation responses relating to Policy S2 (amount and distribution of development) are summarised below.

Objections: preference for retaining current town-centred approach; delivery issues/potential delays with East Cullompton proposal; opposition to East Cullompton - impact on communities to the east; flooding/drainage concerns at East Cullompton; concerns regarding out-commuting from East Cullompton development.

Support: support retention of development focus on towns; support for East Cullompton proposals subject to improved infrastructure and local facilities.

1.25 At the time of the proposed submission consultation in early 2015, it was intended that, once the comments had been considered, the Local Plan would have been submitted to the Planning Inspectorate later that year. However, following consultation the need for additional technical work was identified in order to ensure that the evidence base would be more robust prior to submission, principally flood risk modelling.

- 1.26 Since early 2015, there have also been changes to national guidance and the supporting local plan evidence base which have led to the need for additional modifications. The plan was also updated to include a proposal for high quality tourism, retail and leisure facilities at Junction 27 of the M5 and additional housing associated with this. Therefore in January 2017, a further round of consultation took place to consider the proposed modifications to the Local Plan.

*Supported through Sustainability Appraisal*

- 1.27 The spatial strategy has been tested through Sustainability Appraisal (SA). The SA Update 2018 (**SA02**) has found reasonable alternative proposed strategies for the distribution of development (housing), including a rural distribution, a Tiverton and Crediton focus, a 'Town Focus' (including the allocation of Hartnoll Farm at Tiverton) ), and a new community adjacent to Junction 27 Willand to result in greater negative impacts on SA objectives. Further information can be found on pages 86 – 88, in the Summary Matrix – S2 Distribution of Development (page 95) shown below and in the Annex 3 Additional Reasonable Alternative Appraisals (pages 249 - 263) of the SA Update 2018 (**SA02**).

***Summary Matrix - S2 'Distribution of Development'***

Sustainability Objective	Preferred	Alternative			
	New Community (J28 Cullompton)	Tiverton and Crediton Focussed	Rural Distribution	Town Focus (Hartnoll Farm)	New Community (J27 Willand)
A	-1	-2	-2	-1	-2/?
B	0/?	-2/?	-2	-2/?	0/?
C	0/?	0/?	-1/?	0/?	0/?
D	-3	-3	-2	-3	-3/?
E	+3	+2	+2	+2	+3
F	+1/?	+2	+1	+2	-3/?
G	+3	+3	+3	+3	+3
H	0	+1	-2	+1	0
I	+2	+2	-2/?	+2	+2/?

- 1.28 Further information about the testing and consultation outcomes on alternative options for the distribution of development as these have evolved through the preparation of the Local Plan Review can found on pages 32 -35 of the SA February 2015 (SD04) and pages 123 – 143 in the SA Appendix 2 (**SD04**).

**2) Does Draft Policy S1 work?**

- 2.1 Yes, it does work.
- 2.2 Policy S1 takes forward the objectives set out in the preceding Vision and Spatial Strategy. Criteria a) to m) are high level statements of local plan policy that:

- mirror the chapters in the 2012 NPPF, making clear how sustainable development will be achieved in Mid Devon,
- are strategic priorities which provide the rationale and context for more detail site allocation and development management policies included in the Local Plan Review,
- will, once adopted , carry full weight for the purpose of being used to help inform the preparation of site allocation masterplans and also guide development proposals submitted to the Council for determination and decisions taken on these.

2.3 The SA 2015 (**SD04**) paragraph 4.3 (page 30) makes clear that no alternative strategies for sustainable development priorities exist, as Policy S1 reiterates locally the 2012 NPPF with the exception of criterion a) development focus. The rationale and justification for the development focus in criterion a) is provided in the Council's response to the question 'is the Spatial Strategy a reasonable one' above.