

EXETER CITY COUNCIL

PLANNING MEMBER WORKING GROUP 4 MARCH 2014

EXECUTIVE
18 MARCH 2014

MID DEVON DISTRICT COUNCIL LOCAL PLAN

1 PURPOSE OF REPORT

- 1.1 This report has been prepared to inform Members of the strategic options for development contained in the emerging review of the Mid Devon Local Plan, being prepared by Mid Devon District Council, and to agree the basis of a proposed response.

2 BACKGROUND

- 2.1 Mid Devon District Council (MDDC) is preparing a new Local Plan for Mid Devon, to replace its existing Core Strategy (adopted in 2007), Site Allocations and Infrastructure Development Plan Document (adopted in 2010) and Development Management Policies (adopted in 2013).
- 2.2 MDDC is working to the following tight timescale:
- Initial Options consultation – January/March 2014
 - Local Plan submitted to Secretary of State – September 2014
 - Examination – January/February 2015
 - Adoption of the Local Plan – May 2015

3 ISSUES AND OPTIONS

- 3.1 The initial consultation closes on 24 March 2014. ECC will have further opportunities to influence the plan through the statutory Duty to Cooperate.

Spatial Strategy

- 3.2 The Council has identified two strategic policy options for how development might be distributed around the district. Both options currently seek to deliver approximately 8,400 dwellings and 154,000 square metres of commercial floor space between 1 April 2013 and 31 March 2033. Only one of the options will be taken forward to the final draft of the Local Plan.
- 3.3 Option 1 proposes to concentrate development at Tiverton, Cullompton and Crediton, to a scale appropriate to their individual infrastructures, economies, characters and constraints. Development targets for option 1 are set out in the table below:

| Location | Residential (dwellings) | Commercial (sq metres) |
|--------------|-------------------------|------------------------|
| Tiverton | 3,600 | 49,000 |
| Cullompton | 2,400 | 46,700 |
| Crediton | 800 | 5,300 |
| Rural areas | 1,600 | 53,000 |
| Total | 8,400 | 154,000 |

- 3.4 Option 2 proposes that residential development of up to 5,460 dwellings from 1 April 2013 would be concentrated in the aforementioned three main towns. Later in the plan period, strategic residential growth of approximately 2,940 dwellings would be directed to a new community located either adjacent to Junction 27 of the M5, or adjacent to Junction 28 as an expansion to Cullompton. Residential development of the new community would not commence before April 2026 or the completion of the 5,460 dwellings elsewhere, whichever is the sooner.
- 3.5 The option to site the new mixed use community adjacent to Cullompton/Junction 28 has been put forward by Cullompton Town Council, but currently has no developer backing.
- 3.6 Development targets for Option 2 are set out in the table below:

| Location | Residential (dwellings) | Commercial (sq metres) |
|---|-------------------------|------------------------|
| Tiverton | 2,340 | 31,800 |
| Cullompton | 1,560 | 30,400 |
| Crediton | 520 | 3,400 |
| Rural areas | 1,040 | 34,400 |
| M5 J27 (Willand) or J28 (Cullompton) | 2,940 | 54,000 |
| Total | 8,400 | 154,000 |

- 3.7 The option of a new community is proposed on the basis that, later in the plan period, it will become problematic to continue focusing the majority of development in the three main towns due to land availability and environmental constraints.
- 3.8 In addition to the residential element, option 2 includes proposals for large scale commercial development as part of the new community. The commercial element at Junction 27 is already being promoted by a developer and, if allocated, could come forward much earlier in the plan period than any residential development. The scheme being promoted covers an area of approximately 96 ha for mixed commercial development including:
- 25 ha (600,000-900,000sq ft floorspace) for B1-B8 employment uses;
 - 8 ha (200,000sq ft floorspace) for a designer retail outlet/village;
 - 3.3 ha (90,000sq ft floorspace) for a sports and activity centre including associated retail;
 - 13 ha for a water-based outdoor leisure destination;
 - 4.5 ha (125,000sq ft floorspace) for a Devon produce promotion centre;
 - 3.4 ha for motor vehicle dealerships;
 - 0.8ha (21,000sq ft) for a regional visitors centre;
 - 1.8 ha for a 100-500 room hotel, conference venue/theatre and concert hall;
 - 3 ha (50,000sq ft) for a garden centre;
 - 2.4 ha (50,000sq ft) for an 8-10 screen cinema; and
 - 1.9 ha for a motorway service area.

Extracts from a summary leaflet on the options consultation are attached at Appendix 1.

4 ISSUES

- 4.1 MDDC appears to have undertaken this options consultation in advance of publication of important evidence that should inform the strategy. For example, the housing strategy is just based on existing levels of development plus a notional 20%. The Plan should be informed by three pieces of work:
- i) It is desirable that ECC, EDDC, TDC, MDDC and DCC agree some form of sub regional study identifying the development needs of the sub region beyond existing plans periods to 2026 in Exeter and Mid Devon's case. This study would be available by the Autumn and would enable more informed decisions on the spatial strategy for the sub region including the role of future new settlements.
 - ii) These same authorities which constitute a single housing market area, have commissioned a revised housing market assessment to update the last one agreed in 2010. This is due to be published in the next few weeks.
 - iii) The proposed retail development at Junction 27 will have potentially significant adverse effects on existing town and city centres. This is outlined below.

5 RETAIL ISSUES

- 5.1 The proposal includes is for a 200,000sq feet designer outlet village plus other retail elements including a food festival site of up to 125,000sq ft, a 50,000sq ft garden centre, unspecified amount of 'activity retail' and an 8-10 screen cinema.
- 5.2 The consultation by Mid Devon closes on 24 March, however, the retail assessment which will provide the evidence base on the impact of the proposal has not yet been published. In the absence of the retail assessment one can only speculate on the impact of this proposal on existing town centres. Research by FSP Retail in 2012 suggests that UK outlet centres have an average turnover of about £280sq ft per annum. This would suggest the proposed outlet centre alone would have a comparisons goods turnover of about £56m per annum, if it performed at the turnover per square foot of some of the better performing outlet centres such as Cheshire Oaks or Bicester, turnover might reach £80 or £100m per annum.
- 5.3 The question is where is all this trade going to come from? The transport scoping report suggests that most trips are going to come from the four districts of Mid Devon, East Devon, Taunton Deane and Exeter. The recent retail assessment undertaken for a proposal in Exeter provides some data of the comparison goods turnover of town centres:-

| | | |
|------------|---|-------|
| Exeter | - | £400m |
| Taunton | - | £280m |
| Tiverton | - | £68m |
| Honiton | - | £24m |
| Crediton | - | £18m |
| Wellington | - | £4m |
| Cullompton | - | £5m |

- 5.4 While a small element the outlet centre's turnover will be passing trade from long distance trips on the M5 motorway, diversion from other out of centre shopping developments and any future growth in per capita comparison shopping expenditure, a significant part will be diversion from town and city centres which will also face the continued growth of online shopping. This loss of trade may significantly affect their vitality and viability. The Online Planning Practice Guidance states 'in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.'

6 RIVER EXE FLOOD STORAGE

- 6.1 Members will be aware that at an early stage of consideration of options for an updated River Exe Flood Prevention Scheme, consideration was given to upstream flood storage. This option was rejected for reasons that included the significantly higher costs than the proposals that are currently being implemented. The current proposals will provide 1 in 100 year event flood protection however climate change will gradually erode that level of protection over time. The rate at which the level of protection reduces will depend on the pace of climate change. It may be appropriate for MDDC and the Environment Agency to consider identifying a flood storage consultation area in the new plan, within which MDDC would consult the EA on any future planning application, to the allow consideration of whether approval might prejudice the long term creation of any flood storage area.

7 PROPOSED RESPONSE

- 7.1 It is proposed to respond on the following basis:-

Exeter City Council:

- i) Considers that the next “submitted” version of the Plan should be informed by a sub regional study of longer term development needs and options for the Exeter area and an updated housing market assessment.
- ii) In the absence of this evidence base, is unable to comment on the appropriateness of the proposed level of housing and employment development or the two distribution options.
- iii) Expresses strong concerns that the development proposed involving major retail and leisure development at Junction 27 of the M5 motorway, has been put forward for consultation without a full retail assessment being available and is concerned that this scale of development is likely to have major impacts on the vitality and viability of existing towns and city centres in the sub region and represents an unsustainable, car dominated development strategy.

8 ADVICE SOUGHT/RECOMMENDTION

- 8.1 Planning Member Working Group is asked to support a representation to the Mid Devon Local Plan.
- 8.2 Executive is asked to agree a response based upon the issues raised in paragraphs 4.1 and 6.1 and any other issues considered appropriate by the Portfolio Holder City Development.

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Local Government (Access to Information) Act 1985 (as amended)
Background papers used in compiling this report:
None