

Our Ref: ME/EF
Your Ref:

3 March 2014

For the Attention of Mr P Williams

Local Plan Review Consultation
Forward Planning
Mid Devon District Council
Phoenix House
TIVERTON
Devon
EX16 6PP



Dear Mr Williams

**MID DEVON DISTRICT COUNCIL
LOCAL PLAN REVIEW 2014 - ISSUES AND OPTIONS**

Thank you for the invitation to comment on your Issues and Options document. Please accept this response on behalf of Taunton Deane Borough Council.

The Borough Council wishes to limit its response to strategic matters as they affect Taunton Deane. In particular the Borough Council's concerns relate to matters proposed in the vicinity of Junction 27 of the M5.

Junction 27

The Borough Council has concerns regarding three aspects; namely the employment, retail and leisure elements and in all cases is concerned at the overall sustainability of the proposal.

As a consequence, the Council is concerned that if pursued in its current form it may struggle to persuade an Examination Inspector that it is:

- Positively Prepared. Does it meet objectively assessed development requirements?
- Justified. Is it based on proportionate evidence?
- Consistent with National Policy? Does it deliver sustainable development in accordance with the Framework?

Dealing with each of the proposed uses in turn.

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Employment.

The GL Hearn 2013 Employment Land Review estimates a requirement for between 30-40 hectares of employment land required to be developed to meet demand to 2031. I can find no more up-to-date evidence base from which to work.

I am not clear as to the extent of employment development since the base-line that would need to come off this total but GL Hearn identifies over 55 hectares under construction, with outstanding planning permission or allocations without planning permission. This includes 27 hectares as part of the Eastern Urban Extension and 9.7 hectares at Willand with planning permission.

Paragraph 6.18 of GL Hearn considers the need to rebalance the Councils portfolio to include a number of smaller land allocations not dependent on the provision of significant additional infrastructure. The current employment 'Option' at 25 hectares could not be considered to be a 'small' allocation and would appear to require infrastructure improvements around J27.

Paragraph 8.26 concludes that there is no qualitative or quantitative requirement for further employment land provision and actually suggests a rationalisation of employment land supply in mid Devon. To be viable, it is therefore likely that such a proposal would therefore draw trade and investment from sites and opportunities beyond Mid Devon and into Taunton Deane.

The Council would wish to point out that the GL Hearn document assesses competition along the M5 corridor. Whilst it refers to the Local Plan allocation at Westpark (Wellington) at Junction 26 it excludes the additional 8.7 hectares at Chelston allocated under Core Strategy policy SS5. In addition the study also fails to recognise Core Strategy policy SS8, requiring a strategic employment site to serve the needs of Taunton to be identified in the Site Allocations Plan which is currently underway. I believe my colleague, Kate Murdoch, has raised this policy requirement with you at an earlier Duty to Co-operate meeting.

The Council notes that your option proposes to limit the 25 ha at Junction 27 to Class B8 (storage and distribution) only. This Council considers that this would have less impact on its proposals and policies for Taunton Deane but doubt whether limiting employment to this class would be defensible if challenged.

Retail

Mid Devon's 2012 Retail Study identifies the 'need' for 14,580 sq.m. comparison retail up to 2026 across Mid Devon. Your Issues and Options document reflects the Core Strategy approach to out of centre proposals only where there is a need which cannot be accommodated through a town centre first approach (COR6).

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I have no information on retail development since your baseline, nor sites with planning permission or allocations. However, the Junction 27 proposal alone includes over 18,000 sq.m. outlet village, 4,600 sq.m. garden centre together with a 3 hectare site to include outdoor activity retailing and 11,600 sq.m. of convenience food sales.

The scale of retail proposed at Junction 27 is clearly greatly in excess of your projected requirements and are not related to any centre or urban area. You would be applying a completely different policy approach to the Core Strategy and national policy if you were to pursue this element. The trade draw required to sustain this would clearly be well beyond Mid Devon and would detrimentally impact on Taunton and Wellington town centres and reduce sequentially preferable regeneration opportunities in Development Plan documents within these centres to accommodate any such requirements. The Council does not consider that a 'retail village' would cater for a different market than other 'town centre' retailing. There is no distinction in Use Class.

Leisure

The Junction 27 proposal appears to include a 100-150 bed hotel, 500 seat theatre/conference space, concert venue, outdoor pursuit activity centre and 10 screen cinema.

I can find no evidence base prepared by Mid Devon District to suggest or justify the leisure element of the Junction 27 proposal. Many of these activities would require a sequential approach and in some instances (eg cinema) could impact on Wellington and (eg theatre) Taunton.

Sustainability

Your Core Strategy includes requirements to guide development to the most sustainable locations, reduce the need to travel by car and carbon emissions. This approach is entirely consistent with national policy (The Framework).

The current 'Option' for Junction 27 would be contrary to both your existing policy approach and national policy, to which a Plan would need to conform. This is further compounded by the fact that any residential development would be post 2026 whilst the commercial elements would be proposed for early in the Plan period. The site does not relate to an urban centre, being equidistant from Wellington and Tiverton (6+ miles in each direction) and is a wholly unsustainable location for this form of development and could detrimentally impact on both identified centres as well as Taunton.

3 March 2014

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What is required?

An Examination will require proof that the plan is 'sound'. At the current time the evidence base to support the proposals in the Plan around Junction 27 is either not in place or does not justify the proposal. Likewise at the current time the proposals do not appear consistent with national policy and may detrimentally impact on Taunton and Wellington and the Development Plan policies and strategy in place for these centres. I feel that the same argument could be made for impact on centres within Mid Devon although that is for you to demonstrate. These matters should be addressed or the proposal removed from the next stage of the Plan.

It may be helpful to follow up the Issues and Options report with a Preferred Option rather than moving straight to a published plan. The current stage of the Plan should be iterative and this would enable you time to ensure that your evidence base is sound and transparent whilst providing interested parties further opportunity to engage and ensure that the tests of soundness are best met and not to the detriment of existing Development Plan strategies and the overarching principles of sustainability.

I trust that you find these comments constructive and help towards coming to conclusions regarding this proposal. The Borough Council is of course entirely willing to work with you to ensure that the Development Plan is soundly prepared and provides a co-ordinated approach to growth within the two Districts.

Yours sincerely

CLLR MARK EDWARDS
Executive Councillor