

PLAN MID DEVON 2023 – 2043

Regulation 18 – Issues Consultation

January 2022



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INTRODUCTION

What we are consulting on

1.1 We are preparing a new Local Plan for Mid Devon (excluding the small part of the district within the Dartmoor National Park), which we have called '**Plan Mid Devon**'. This will cover the period to 2043 set within a vision that looks further ahead (to 2053). Once completed, this will replace the current Mid Devon Local Plan 2013-2033 and form part of the statutory development plan for Mid Devon with the Devon Minerals and Waste Plans and adopted Neighbourhood Plans.

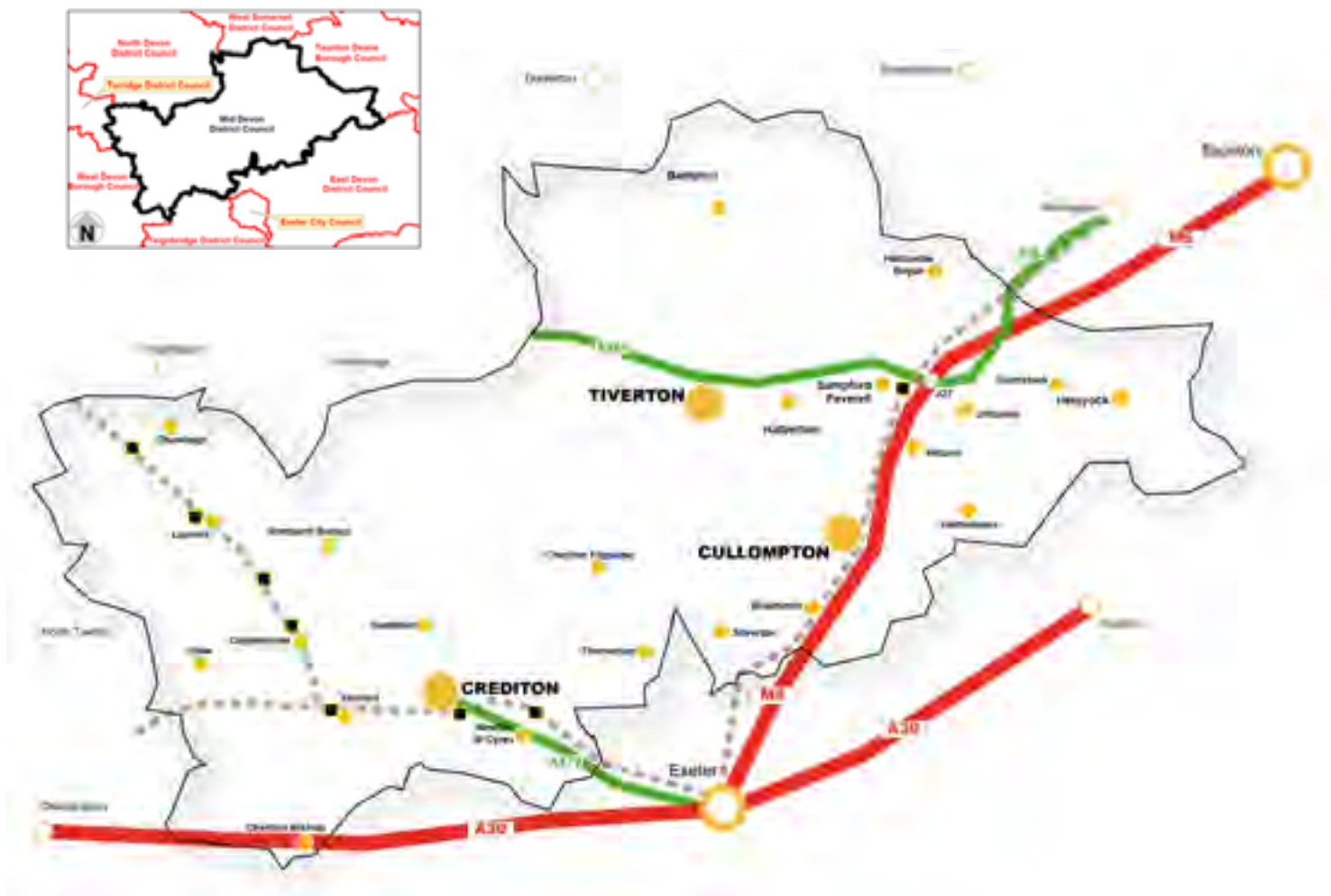
Why is a new Local Plan needed?

1.2 The country has a plan-led planning system and there is a legal requirement for the Council to prepare a local plan for the district.

1.3 The current Mid Devon Local Plan was adopted by the Council in July 2020 and has a lifespan to 2033. This will continue to bring many benefits to Mid Devon. It will:

- Help tackle the causes and effects of climate change.
- Promote sustainable use of energy and other resources.
- Guide multi-million pound investment across the district.
- Plan for new homes, employment and other uses to meet our needs.
- Make sure that new schools, transport and other supporting infrastructure is provided.
- Help us regenerate our town centres.
- Protect and enhance those parts of the district where we do not wish to see un-planned development taking place, including the open countryside and high quality landscapes.

1.4 There is a legal requirement for a review of the Local Plan to be completed in five years. To achieve this we have started the preparation of Plan Mid Devon now. The new Local Plan will have regard to the latest national planning policies, practice guidance and thinking about how best to plan in the context of a national housing crisis, economic recovery and the challenges of a climate emergency. It will also ensure Mid Devon will continue to benefit from a plan-led approach for development to meet our current and future needs over a longer time period to 2043.



The Issues Paper

1.5 This Issues Paper is the first stage in preparing the new Local Plan (known as Regulation 18 Issues). We are seeking your views about what the new Local Plan will include and how Mid Devon should be planned for in the future. The Issues Paper provides more information about planning and the matters affecting Mid Devon. We would like you to tell us what issues you think are most relevant and important to you and your community, and which should be given greatest priority in Mid Devon for the period to 2043.

The consultation documents

1.6 The Issues Paper is supported by

- a Sustainability Appraisal / Strategic Environmental Assessment Scoping Report.
- an Equalities Impact Assessment Screening Report.

1.7 These documents are available on our website and are published for public consultation here:

www.middevon.gov.uk/ friendly URL

Understanding land use planning

1.8 The land use planning system includes many terms that you may not be familiar with. Where we have underlined these we have provided an explanation for the terms used in a 'Glossary' in Appendix 1. This Issues Paper will be accompanied by a shorter paper that will summarise its purpose and main content.

The role of the Council, Devon County Council and neighbourhood planning bodies in preparing Development Plans

1.9 Mid Devon District Council is the Local Planning Authority for Mid Devon District but excluding the part at Cheriton Bishop that is situated within the Dartmoor National Park. Mid Devon District Council is responsible for preparing Local Plans and for determining planning applications submitted in its planning area.

1.10 Devon County Council is responsible for preparing the Devon Minerals and Waste Plans which cover Mid Devon. Devon County Council is also the local transport authority and local education authority. It is a consultee for preparing Local Plans for Mid Devon and advises the Council on infrastructure matters.

1.11 Town and Parish Councils can choose to prepare neighbourhood development plans for their area. These need to be in general conformity with the strategic policies of the Local Plan, and can include policies and proposals that give people more say in what is planned in their local area.

Relationship with other documents

1.12 Plan Mid Devon will form part of the Council's policy framework alongside the Economic Strategy for Mid Devon 2019-2024, A Housing Strategy for Mid Devon 2021-25 and other plans, programmes and strategies. It is informed by the National Planning Policy Framework (2021) and current planning policy guidance, along with the Planning and Compulsory Purchase Act 2004, Climate Change Act 2008, Planning and Energy Act 2008, and Flood and Water Management Act 2010. It will have an important role through guiding the development and use of land and buildings to help the Council achieve its ambitions in the Mid Devon Corporate Plan and priorities in the Housing Strategy and will operate in conjunction with the emerging Devon Carbon Plan.

How and when comments should be made

1.13 There are a number of questions throughout this Issues Paper and we welcome your responses to these. You are able to leave blank those questions that you do not wish to reply to.

1.14 Comments on the Issues Paper and its supporting documents must be sent to us by We encourage you to do this by completing the online response form provided. Alternatively, the response form can be printed off and sent to us by email or by post:

By email: planmiddevon@middevon.gov.uk

By post/hand: Forward Planning,
Phoenix House,
Phoenix Lane,
Tiverton,
Devon, EX16 6PP

1.15 Your comments must be sent to us in writing and include your name and full postal address otherwise your comments cannot be registered. Please note your comments will be published on our website including your name and address. If you are able to provide an email, please provide this along with your comments as this will help us keep you up to date.

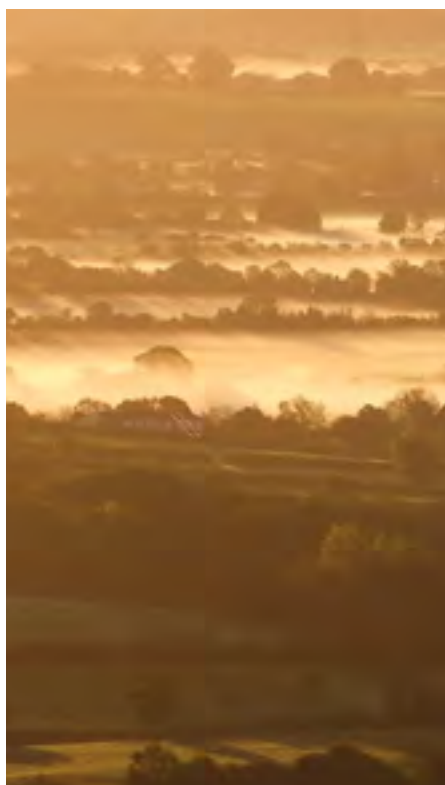
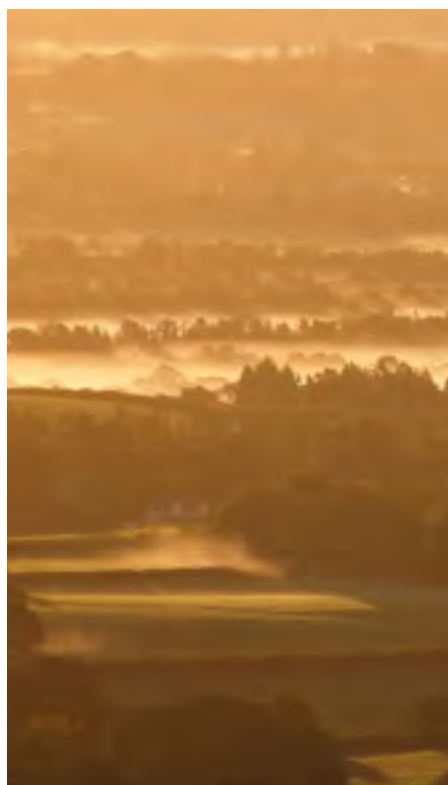
1.16 Your contact details will only be used by the Council to inform you about the new Local Plan and other planning policy documents prepared by us.

1.17 For more information about how we use your personal data please see our Privacy Notice www.middevon.gov.uk/PNRepresentations.

How you can find out more

1.18 The public consultation will be supported by engagement activities, including face to face exhibitions (where these are possible) where you are welcome to drop-in and tell us about how we should plan for the future of Mid Devon, and also some online / virtual events. More information about these will be published in advance of the consultation.

Forward Planning Team Mid Devon District Council

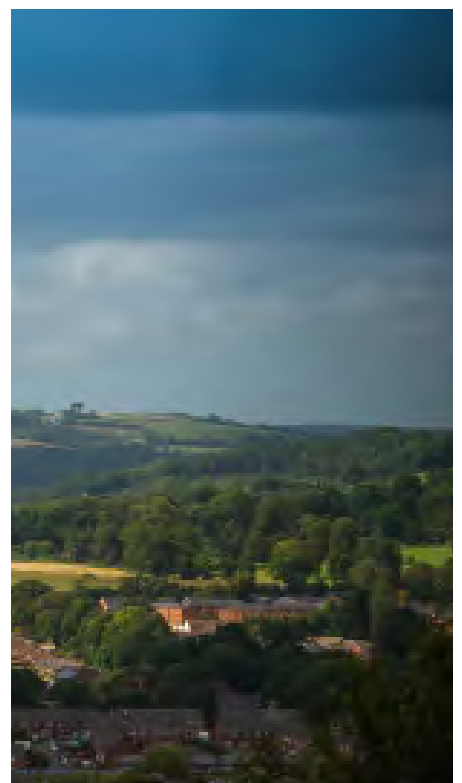
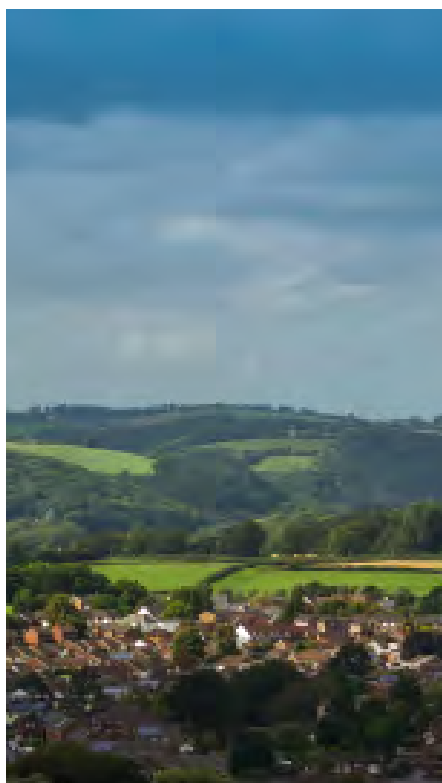


PLAN MID DEVON

SUSTAINABLE DEVELOPMENT AND SIX TOP PRIORITIES

A new Local Plan

2.1 Plan Mid Devon is needed to provide an up to date, capable and effective means to plan for our needs and help guide planning applications submitted to the Council for determination, and the decisions made on these. This new local plan will need to reflect key issues and challenges facing the district, while being consistent with national planning policy and planning practice guidance. Plan Mid Devon will harness opportunities where these are available to help shape the future planning of the district for a 20 year period, but will need to be realistic about what is capable of being achieved in terms of environmental limits, the viability of development and meeting policy requirements, and the ability to attract inward investment and deliver infrastructure improvements to support a strategy that achieves sustainable development.



Sustainable Development

2.2 The National Planning Policy Framework makes clear that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental. These are interdependent and need to be pursued in mutually supportive ways, as follows:

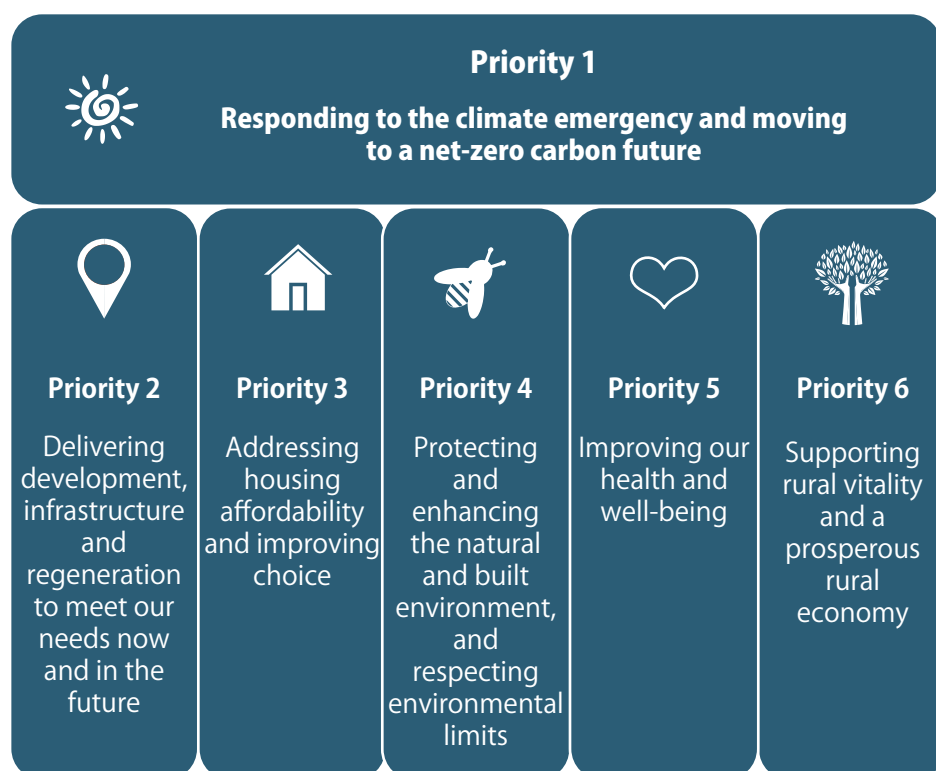
Economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

Social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

Environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Top 6 priorities

2.3 We have identified what we believe to be the top 6 priorities that should go the heart of the strategy for the new Local Plan and which can help achieve sustainable development. Each priority is important in its own right and each are interrelated. However, we believe that responding to the climate emergency and moving to a net-zero carbon future must be the overarching top priority for the Plan Mid Devon. This is since many of the actions that are needed to tackle the climate crisis are also key in helping us achieve the 5 other priorities we have identified to plan for a sustainable, resilient and prosperous Mid Devon.



Priority 1

Responding to the climate emergency and moving to a net-zero carbon future

2.4 Our climate is changing as a result of greenhouse gas emissions, including carbon dioxide and methane. Globally three quarters of greenhouse gas emissions come from fossil fuels and industrial processes, while agricultural practices such as livestock farming, forest felling and peatland destruction account for much of the rest. In Mid Devon the most significant emissions come from on-road transportation (30%), closely followed by agriculture (29%) and buildings (26%)¹. The emission of greenhouse gases is having a profound effect on weather patterns, and can result in more frequent and extreme events such as high temperatures, drought, heavy rainfall or storms. These events in turn have potential to impact adversely on Mid Devon's economy (e.g. farming and food production), infrastructure, buildings and its communities in terms of cost through damage and disruption and also on our health. The Interim Devon Carbon Plan states that a series of national temperature records were broken in 2019 including the hottest ever UK recorded temperature (38°C). In the South West, winter precipitation increased by 15.9% between 1961 and 2006. A 2°C of global warming is likely to result in an increase in median winter precipitation of up to 20%. In the summer, precipitation is likely to decrease with median reductions of up to 30%. We will therefore see a move towards warmer, wetter winters and hotter, drier summers. These figures have been taken from the UK Climate Projections 2018 (UKCP18). The report also highlights how these changes may affect key sectors across the South West's environment, economy and society. The Mid Devon Climate Strategy & Handbook 2020 – 2024 identifies some of the most pertinent issues in the South West where climate impacts are likely to be the most severe:

- Critical infrastructure
- Tourism
- Health
- Biodiversity
- Coastal Change

2.5 In May 2019 Devon County Council agreed to declare a 'Climate Emergency' and to initiate a county-wide partnership to ensure Devon becomes Carbon Neutral by 2050. This means that the total carbon emitted by the county as a whole will need to be balanced out through an equivalent amount of carbon savings. This is consistent with Climate Change Act 2008 (as amended) which commits the UK to reduce emissions by 100% in 2050 from 1990 levels, and the Paris Agreement (2016) which requires limiting the rise in global temperatures to well below 2°C above pre-industrial levels and intends to limit the global temperature increase to 1.5°C.

2.6 Mid Devon District Council formally signed up to the Devon Climate Declaration in June 2019, but will aim to become carbon neutral by a more ambitious date of 2030. In 2020, the Council produced its own Climate Action Plan. While this has focused on the Council's own activities (such as its use of energy and its housing stock and leisure facilities) it also includes a commitment to update the Local Plan to include ambitious climate policies.

2.7 There is a statutory duty on the Council to include policies in the new Local Plan to tackle climate change and its impacts. This is placed through the Planning and Compulsory Purchase Act (2004, as amended)² which states 'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the Local Planning Authority's area contribute to the mitigation of, and adaptation to, climate change'. National planning policy places significant emphasis on the role of the planning system to support the transition to a low carbon future in a changing climate. The inclusion of a priority in Plan Mid Devon to move towards net-zero carbon will mean that the district will be planned so as to reduce emissions to the lowest amount and with offsetting as a last resort.



Priority 2

Delivering development, infrastructure and regeneration to meet our needs now and in the future

2.8 Mid Devon is situated to the north of the city of Exeter, one of the most rapidly expanding economies in the country, and falls within its sphere of influence as part of both the Exeter Travel to Work Area and Exeter Housing Market Area. The district is well connected and accessible to the South West and beyond by the M5 motorway and the Great Western mainline railway. We have sought to maximise this opportunity through the current Local Plan by allocating land for development and setting out policies that will help deliver quality growth in a high-quality environment.



2.9 Plan Mid Devon will look forward to 2043, set within a vision that looks further ahead (to 2053). It will make provision for new homes, jobs, schools, shops, transport, healthcare facilities, green spaces and other infrastructure for this period. In doing so it will have a critical role in guiding multi-million pound investment across the district and will be a key document for the development industry, government agencies, transport, education and healthcare providers, and the whole Mid Devon community. Plan Mid Devon will be informed through an understanding of what is needed over this plan period, including through gathering evidence and technical studies, and following national planning policy and guidance (such as the Government's standard method for assessing housing need for the Mid Devon area).

2.10 Planning the future growth of the area should be orientated around improving our life chances, where the plan can provide opportunities for individuals to improve their quality of life. This can include for example:

- Homes that better meet the needs of the whole community
- Improved levels of home and neighbourhood satisfaction
- Reduced need to travel by car
- Higher level of academic attainment and qualifications
- Higher wages
- Raised living standards
- Improved health and well-being, and access to open space
- Reduced indices of multiple deprivation

2.11 Plan Mid Devon will set out infrastructure requirements to support and facilitate the delivery of the growth that is planned to 2043. It will make clear when this is needed, how it will be provided and how it will be paid for.

2.12 Regeneration opportunities in towns and villages, including the reuse of previously developed land and buildings, can contribute towards meeting the development needs of the district, and help improve the vitality of centres as places that support our communities.

Priority 3

Addressing housing affordability and improving choice

2.13 The growing gap between affordable accommodation and household income has led the Government to declare that Britain's housing market is broken³. In response to this, national planning policy requires Local Plans to meet the needs of those who cannot afford to rent or buy a home and to ensure that the agreed approach contributes to creating mixed and inclusive communities.



2.14 To help achieve this, the Council has prepared a new Housing Strategy 2021-2025 and has consulted on this. The Housing Strategy includes measures to meet the area's accommodation needs, improve design quality and climate change resilience of new housing, address issues of affordability, ensuring appropriate and accessible homes for everyone. Plan Mid Devon will need to take into account changing demographic patterns to deliver genuinely affordable homes that are of the right size, type and tenure to meet the needs of a range of households, including families with children, young people and an ageing population.

2.15 Lack of affordable accommodation can have a range of negative impacts for the estimated 17.5 million people in Britain impacted by what the charity Shelter⁴ describes as a housing emergency. For example, where households reside in overcrowded or unsuitable accommodation, this can result in domestic breakdown. When families are forced to separate in search of housing, this can also affect income and family bonds, with the need to replace unpaid help with professional social or child care. For the 11.8% of children living in poverty within Mid Devon, local house price affordability could be a further barrier to social mobility, potentially locking them into a cycle of poverty which can affect the ability to acquire skills, reducing adult wages in the long term.

2.16 For those who work or study but can't afford to live in the vicinity, this may mean that there is a need to travel further for education or employment opportunities, putting additional pressure on incomes and potentially contributing to increasing air pollution through vehicle emissions. When local people are forced to move away in search of affordable accommodation, this can also lead to reduction or closure of a community's existing services and facilities, and in rural areas may result in a loss of younger people in local communities.

2.17 The new Plan can strengthen communities through policies to discourage residential properties from being left empty or used solely as holiday dwellings and can prevent segregation or distinction between the design and quality of market and affordable homes. Where new affordable housing is to be provided, it will be necessary to assess the location in sustainable terms, such as the availability of public transport, local shops, schools and healthcare services. This will be particularly important when considering development in rural areas.

2.18 Average house prices in Mid Devon currently have one of the highest affordability ratios in the country, outside London. The purchase of a home within the district can typically cost around 9.3 times that of a full time employee's workplace-based annual earnings, in comparison with the national average of 7.8, while house prices may be even higher in some of the district's more rural locations. In certain areas, competition from second homes and short term holiday lets can further reduce the number of properties available for rent as homes. Consequently, with mean income levels 11% lower than the average for England, many local people have difficulty accessing housing on the open market. This particularly affects the young and those on low to medium incomes who are entering the housing market. For others, it may be that existing accommodation may be either unsuitable or does not meet their changing needs but that a suitable home may not be affordable.

2.19 'Affordable housing' is an umbrella term that covers housing provided to eligible households whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), with eligibility based on local incomes and local house prices.

2.20 Housing diversification is a key issue and the Plan will need to provide a variety of alternative solutions and innovative building practices, delivered by a wider range of housing providers, in order to suit all pockets. This approach offers a choice of different ownership and rental options, which are explored in detail within Section 6 of the Issues Paper. These include custom and self-build; the discounted First Homes scheme; build to rent by Housing Associations or private investors; community led housing; and co-housing. Affordable housing is usually delivered by housebuilders on development over a specified size as a legal requirement. Plan Mid Devon will set out the percentage of new dwellings on a site that must be affordable and will ensure that the district has the right homes, new and existing, for the right people in the right places.



Priority 4

Protecting and enhancing the natural and built environment, and respecting environmental limits

2.21 Mid Devon covers an area of 353 square miles (914 km²), situated between Dartmoor, Exmoor and the Blackdown Hills. This area is mostly countryside, which supports biodiversity and includes some protected landscapes that provide an attractive natural environment. The district also features the rivers Exe, Creedy and Culm and a number of others that contribute to the district's character.



2.22 Mid Devon has numerous designated and non-designated heritage assets such as listed buildings, registered parks and gardens, and archaeological remains. While the district is sparsely inhabited, except for the three main towns, its historic environment is distinctive, has character and gives the area a sense of place.

2.23 In 2020 Mid Devon published a new Design Guide Supplementary Planning Document (SPD). This describes the district as having unique characteristics that are intrinsically woven into the landscape. It states that if high quality design is to be achieved, the design has to maintain the uniqueness and distinctiveness of the district, while also considering future needs, addressing climate change, building sustainably and protecting and enhancing the natural and built environment.

2.24 As Mid Devon is mostly rural, most of the land is used for agriculture, with 70% of holdings managed as grassland for dairy, lowland cattle and sheep. Since agriculture is one of the major source of employment in the district, it is therefore important to retain and protect it as well as manage it sensibly in protection of our natural environment.

2.25 Approximately 6% of Mid Devon land lies within the floodplain of rivers. There is a long history of river flooding throughout the district and the three main towns have the highest number of properties at risk from fluvial flooding. There are a number of small watercourses and field drains which may pose a risk to development as well. In respect to the environmental limits, climate change and risk of flooding, the floodplains should remain undeveloped. The preparation of Plan Mid Devon will have regard to other work that is in progress to improve our natural environment, where this is relevant to the future planning of the district. This can include the 'Connecting the Culm' project for the River Culm catchment, which seeks to introduce land management measures to tackle the growing issues of flood and drought, improve water quality in the river, and create a better place for wildlife and people.

2.26 Some of these matters are explored in more detail elsewhere in this Issues Paper and your comments invited.

2.27 Plan Mid Devon will need to protect and enhance our high quality natural and built environment and bring net gains in biodiversity.

Priority 5

Improving our health and well-being

2.28 Public health and land use planning are closely linked historically. The planning system that we have today was born out of a need to address poor living conditions in the nineteenth century (dense urban areas, overcrowding and poor sanitation) that had caused disease (including cholera and typhoid) and ill-health and high morbidity. There was a recognition that the physical environment was a key determinant of health and that state intervention was needed.



2.29 Wind forward to today, and living conditions and the quality of the physical environment are under the spotlight again at a time when the world is in the grip of the COVID-19 pandemic. The global disease has had a devastating impact on the lives of many, both in terms of lives lost and those that continue to suffer its long-term effects on their physical health and mental well-being. While COVID-19 has been indiscriminate across all parts of our community, those most vulnerable and disproportionately affected have been in older age groups or those with underlying health conditions.

2.30 The need for social distancing and restrictions imposed on public gatherings and travel have meant changes to the way we live, work and take leisure activities. The types of homes people live in (and their affordability), the availability of private amenity space, proximity of places of employment, schools, shops, and access to green space and opportunities for walking, cycling and other forms of exercise have been brought into focus as we start to think about how best to plan Mid Devon through a new Local Plan.

2.31 The new Local Plan can influence our environment and impact on our physical health and mental well-being (and our life chances) as follows:

- Fitness – designing for active lives - access to quality open space and walking / cycle routes
- Diet and nutrition – improving local opportunities for growing food (e.g. fruit and vegetables)
- Mental well-being – minimum space standards for new homes including gardens, access to other outdoor space, places for social interaction
- Respiratory health – improving air quality through reduced pollution

2.32 These issues can be inter-related and may be picked up in the themes covered in other parts of this Issues Paper.



Priority 6

Supporting rural vitality and a prosperous rural economy

2.33 Mid Devon is a predominantly rural district. More than half of the population of some 82,000 people reside outside the district's three towns of Tiverton, Cullompton and Crediton.

2.34 Mid Devon has a large number of villages, hamlets and other small settlements that are scattered across the countryside.

2.35 The current Local Plan identifies a network of 22 of villages with sufficient services and public transport provision as sustainable locations for some limited development to provide for housing, shops, local services, community facilities and low impact businesses, at a scale commensurate with that of the existing village. The current Local Plan avoids a wider distribution of housing in these smaller settlements since this would risk significant increases in unsustainable travel, where there would be a reliance on use of cars.

2.36 However, a lack of housing opportunities in villages that are affordable to many in those communities has contributed to local people being forced to move away to other parts of the district and elsewhere. This can impact on the ability of shops, local schools, services and community facilities to be sustained in these locations.

2.37 Agriculture is an important element of the Mid Devon economy. While much farming activity falls outside the planning system, agricultural development can be essential to support modern farming and ensure a sustainable rural economy. The current Local Plan includes a policy specifically for agricultural development. It also includes policies for equestrian, tourism and leisure development, and also supports the diversification of the rural economy. However, there is a need to balance this with avoiding forms of development that are not suitable in countryside locations.

2.38 Given the role of villages in supporting local sustainability and also the importance of agriculture, this Issues Paper identifies 'supporting rural vitality and a prosperous rural economy' as one of the top priorities for the future planning of the district. Section 13 of the Issues Paper explores this further.

2.39 The following question asks whether you agree with the top six priorities that we have identified for the new local plan and if there are other priorities we should include. We recommend that you read through the whole of this Issues Paper, which may help you consider how to respond to this question.





Question 1

Do you agree with the top 6 priorities that we have identified for the new Local Plan?

- **Priority 1** Responding to the climate emergency and moving to a net-zero carbon future (Yes/No)

Do you agree that Priority 1: Responding to the climate emergency and moving to a net-zero carbon future should be the overarching / top priority for Plan Mid Devon? (Yes/No)

- **Priority 2** Delivering development, infrastructure and regeneration to meet our needs (Yes/No)
- **Priority 3** Addressing housing affordability and improving choice (Yes/No)
- **Priority 4** Protecting and enhancing the natural and built environment, and respecting environmental limits (Yes/No)
- **Priority 5** Improving our health and well-being (Yes/No)
- **Priority 6** Supporting rural vitality and a prosperous rural economy (Yes/No)

If no, please state which priority/ies and why

Scan our QR code to access our online survey or visit middevon.gov.uk



If you require a printed version of our questions please call **01884 255255** or email us at planmiddevon@middevon.gov.uk



OUR MID DEVON VISION AND OBJECTIVES

Fill out our survey
online or request a
paper copy.
Make sure you let us
know what you think!

Scan our QR code
to access our
online survey
or visit
middevon.gov.uk



3.1 The previous section of this Issues Paper identifies what we believe should be the six top priorities to focus our thinking around the future planning of Mid Devon, and we have invited your comments on these. We would now like you to help us write a vision for the future planning of Mid Devon and identify the key objectives that we want to achieve and how these should be prioritised. However, we suggest you may wish to read through the rest of this Issues Paper before thinking about a vision for Mid Devon.

If you require a printed version of our questions please call **01884 255255** or email us at planmiddevon@middevon.gov.uk

3.2 The current Local Plan includes the following vision for Mid Devon:

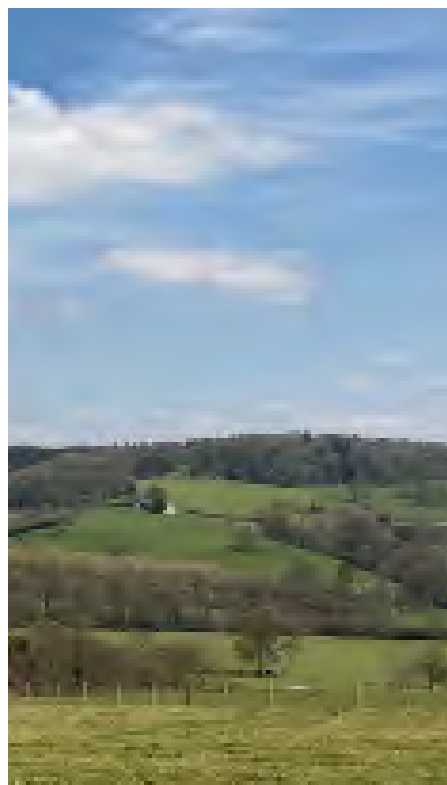
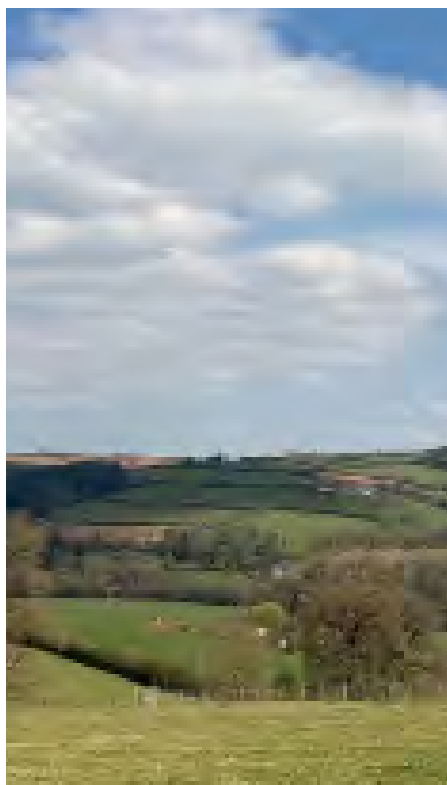
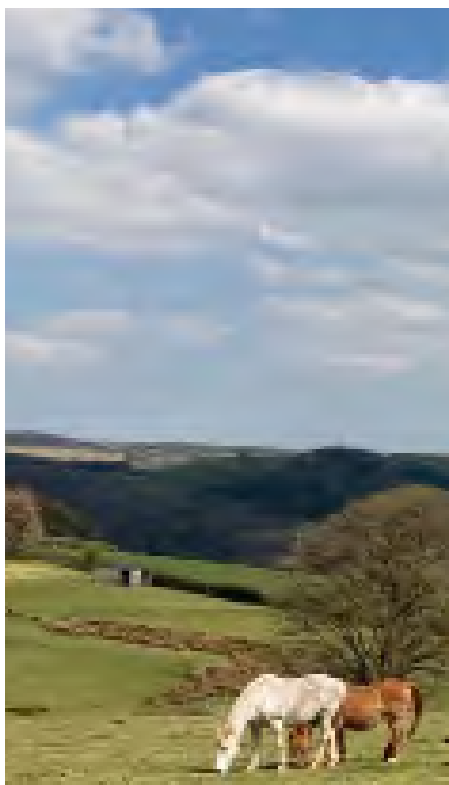
Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services and a clean, green, safe environment. Local communities and private, public and voluntary organisations will work in partnership to meet social and economic needs in ways that enhance the environment and reduce the area's carbon footprint. High quality development in the right places with appropriate infrastructure will bring regeneration, social and economic benefits and enhance towns, villages and countryside while promoting sustainable use of energy and other resources and tackling the causes and effects of climate change.

We suggest you may wish to read through the rest of this Issues Paper before thinking about a vision for Mid Devon

Question 2

What parts of this vision do you think should be kept and what parts should be changed, and why?





Responding to the climate emergency and moving to net-zero carbon

Local Plan policy responses to climate change

4.1 The current Local Plan includes policies to meet the challenge of climate change by supporting a low carbon future, energy efficiency and increasing the use and supply of renewable and low carbon energy. However, Plan Mid Devon provides an opportunity to review these in light of current national planning policy and practice guidance, and also the Council's recent climate emergency declaration. The new Local Plan will need to take a proactive approach to mitigating and adapting to climate change, supporting appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, whilst recognising the link between climate change and biodiversity loss. This can be broad ranging in terms of what policy responses can be included in the new Local Plan. This Issues Paper therefore takes climate change and the transition to a low carbon future into consideration throughout, where it can cut across a number of themes in relation to the development and use of land and buildings. For example, new development should be planned for in ways that can reduce its carbon footprint and help make it resilient to climate impacts, by:

- facilitating active travel by making sure that cycling and walking are available as the 'default' modes of transport, rather than 'designing in' a reliance on car-based travel
- increasing the use of, and access to, high quality public transport
- avoiding increased vulnerability to flood risk to people and property
- helping reduce greenhouse gas emissions through its location, orientation and design
- including design measures to avoid overheating in extreme hot weather, such as encouraging use of materials which maximise sunlight reflection and increasing areas of blue and green infrastructure
- providing access to, and support and encourage the use of new technologies and digital communications
- increasing the use and supply of renewable and low carbon energy

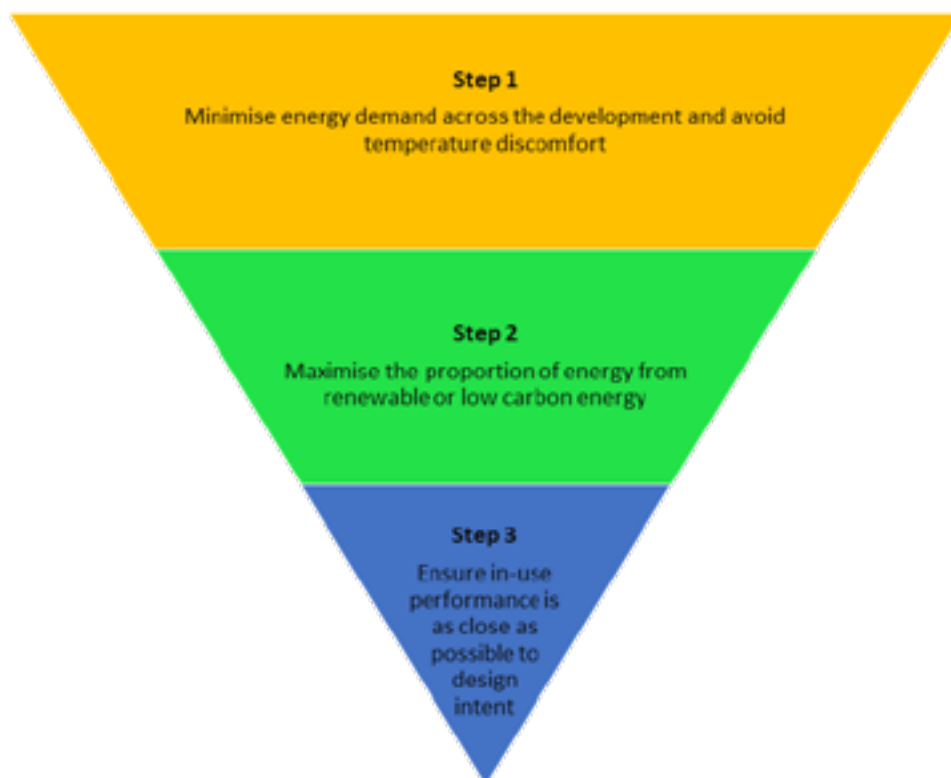


Net-Zero Development

4.2 Measures to reduce carbon emissions nationally have been driven by the power and waste sectors. However, all sectors will need to achieve significant carbon reductions to meet legally binding targets, including transport and buildings. Development plan documents are one of the key areas where local authorities can influence carbon emissions at a local level.

4.3 Development location and sustainable transport investment is the most significant way to reduce carbon emissions from new development.⁵ By ensuring easy access to jobs and basic services/facilities by active travel and high quality public transport links, the need to travel by private car can be reduced, particularly within the three main towns. Reducing the need to travel, particularly by private car, will be reflected in the spatial development strategy for Plan Mid Devon and where land is identified for development (such as through site allocations). Digital connectivity is also key to reducing the need to travel, by enabling the ability for home working and access to online services.

4.4 In respect of buildings, there is an opportunity for Plan Mid Devon to become more ambitious in supporting its net-zero activities. The current evidence base⁶ advocates the application of an 'Energy Hierarchy' approach as summarised below:



⁴ Low Carbon and Climate Change Study 2020



4.5 The energy hierarchy essentially provides a flexible process that can be applied to development proposals to ensure effective and efficient carbon emissions reductions. It starts with considering how fabric efficiencies can reduce energy demand across the development before considering how to maximise the proportion of energy from renewable or low carbon sources. The proposed approach is flexible as to how carbon reductions are met in order to take into account site specific feasibility and viability considerations. Additional guidance on how to apply the energy hierarchy approach is provided below:

Mechanism

Step 1

- Use masterplanning to minimise energy demand through passive design.
- Effective use of landscaping and green/blue infrastructure.
- Adopt a 'fabric first' approach.
- Development should be designed to be climate resilient.

Step 2

- On-site renewable energy generation should reduce unavoidable carbon emissions associated with any residual energy use.
- Enable electric vehicles to discharge to the grid (vehicle to grid) and help meet the power needs of the buildings.
- Off-site measures are a potential option for developments where on-site measures are not practical/viable.
- **As a last resort**, carbon offsetting could be used to fund a large scale energy efficiency programme in existing buildings, large scale renewable energy installations, and community energy projects and heat network expansions for instance.

Step 3

- Use a recognised building quality regime and monitor in-use data to ensure the in-use performance of the buildings is as close as possible to the way they were expected to perform.
- Performance monitoring and evaluation will need to ensure that the sample data is representative of the development as a whole.
- Where a performance gap is identified corrective action should be taken.

Question 3

Do you think that the Local Plan should introduce policies requiring that all developments which propose the construction of new homes or non-residential floorspace will be designed, constructed and will perform to deliver net-zero carbon emissions? (Yes / No - please provide your reasons)

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4.6 To date, the built environment sector has been focussed on addressing mainly operational emissions via reduction targets in building regulations (Part L) with the embodied aspect of carbon emissions not being fully addressed. This is particularly important since over half of all carbon emissions associated with the lifetime of a residential development are 'locked in' prior to practical completion⁷. It is therefore important that Plan Mid Devon considers the impact of a development both in terms of anticipated operational and embodied emissions of its entire life-cycle. There is an opportunity for Plan Mid Devon to establish policy which helps identify the overall best combined opportunities for reducing lifetime emissions, and help to avoid any unintended consequences of focussing on operational emissions alone.



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Question 4

Do you think that the Local Plan should introduce a policy to address the Whole Life-cycle carbon impacts of a development? If yes, do you think we should take the following approach(es):

- **Exclusion – banning 'things' with unacceptably poor performance / impact (Yes/No)**
- **Preference – preferring 'things' with better performance / lower negative impact (Yes/No)**
- **Quantified performance – setting explicit, quantified limits that determine which 'things' are acceptable / unacceptable (Yes/No)**

Do you have any other comments on Whole Life-cycle carbon impacts, or which circumstances each of the three approaches might apply?

Reducing the need to travel by car

4.7 The COVID-19 pandemic has offered a glimpse into a carbon neutral future. In Devon, road transport emissions represent 28% of the county's total carbon emissions. It has been estimated that Devon's carbon emissions reduced by almost a quarter (23%) during the first lockdown and average traffic flows decreased by 60%, reducing total emissions by 17% as travel restrictions were imposed and many people were forced to work from home.





4.8 There is potential for working from home to continue to affect working and commute patterns in the longer term. While a return to the work place is likely for many, this could be through a hybrid approach with fewer days each week. The ability to work from home may be influenced by the suitability of people's properties and the also quality of broadband connectivity. Reduced travel can also be achieved through there being local job opportunities, and provision of local shops and services. However, given the rural nature of much of the district it is recognised that the car is likely to remain the dominant mode of transport for many, particularly where there are no alternatives, or where public transport may be unaffordable or not convenient.

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Question 5

How do you think we should plan the future of Mid Devon to help reduce the need to travel by car?

Renewable and low carbon energy

4.9 The Government's approach in tackling climate change has evolved over time. Ambitious carbon reduction targets have led to Government incentives for renewable energy schemes, resulting in a marked increase in planning applications for wind turbines and field-scale solar energy development. The Mid Devon Landscape Sensitivity Assessment considers the susceptibility of different parts of the landscape to change as a result of wind and solar energy development of different sizes, scales and groupings. While this assessment is a material consideration in decision-making, alongside evidence of biodiversity, noise, glare and other impacts, with the exception of several urban extensions (North West and East Cullompton) the current Local Plan does not identify other areas in the district that may be suitable for renewable and low carbon energy development.

4.10 There is an opportunity through the new Local Plan to look afresh at measures to increase the use and supply of renewable and low carbon energy and heat. This could include identifying suitable areas in Mid Devon for renewable and low carbon energy development such as solar and wind, hydro-electric and other potential sources and its supporting infrastructure, while ensuring that potential adverse impacts i.e. on landscape and amenity, are addressed satisfactorily. It can also include opportunities for other proposed developments to have their own decentralised renewable or low carbon energy supplies (e.g. district heating), and for co-locating potential heat customers and suppliers.





Question 6

How do you think the new Local Plan should plan for renewable energy developments?

- Identify one or more broad areas in the district within which proposals for renewable energy could be supported e.g. for wind and solar? (Yes/No)
- Identify one or more specific suitable sites in the district for renewable energy e.g. for wind and solar or small-scale hydro? (Yes/No)
- Do not identify suitable locations but set out criteria for determining planning applications? (Yes/No)
- Require all strategic urban extensions and the Culm Garden Village to include decentralised renewable or low carbon energy supplies (subject to feasibility and viability)? (Yes/No)
- Restrict renewable energy development in Mid Devon? (Yes/No)

Other (please tell us what you think this should be)

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Question 7

Which renewable energy technologies should be prioritised in Mid Devon?

- Onshore wind (Yes/No)
- Solar Photovoltaic (PV) (Yes/No)
- Small scale hydro (Yes/No)
- Biomass energy (Yes/No)
- Energy from waste (Yes/No)
- Anaerobic Digestion (AD) (Yes/No)
- Heat networks (Yes/No)
- Solar thermal (Yes/No)
- Heat pumps (Yes/No)
- Other (Please state what this is)

Do you have any further comments?

Question 8

Are there any other measures in relation to the development and use of land and buildings that you think the Local Plan should consider to help address climate change and help us move towards a low carbon future?



Access to new technologies and digital communications

5.1 The government has an ambitious target for all parts of the country to have full fibre broadband coverage by 2033 and for the majority of the population to have 5G coverage by 2027⁸. Digital connectivity such as broadband and mobile phone coverage that allows a wireless internet access provides a vital platform for social interaction and well-being. Poor broadband or wireless internet access can be a significant barrier to growth for businesses, and the future competitiveness of Mid Devon and its towns and villages will be influenced by the quality and capacity of digital infrastructure. A key consideration in future proofing development will be to make sure ducting is provided, which is open access (open to all fibre providers of a broadband service) and is suitable for and includes full fibre connections to each building. This ducting should have capacity for multi-operator fibre to encourage competition, and give choice for consumers. Other considerations include coordinating the provision of digital infrastructure with development, and with highway and utilities improvements (i.e. 'dig once'), and the speed of digital connectivity.



5.2 Digital infrastructure will be key to help economic growth and prosperity, supporting employment, education and social opportunities. Connecting Devon and Somerset (CDS), a Government funded and local government-led partnership programme has helped with broadband rollout across Mid Devon, which has a goal of bring connectivity and opportunities to more isolated homes, businesses and communities. However Mid Devon still has some of the most digitally isolated areas in the whole of the UK in terms of broadband speeds and coverage, which is mostly due to the highly rural nature of the area. In comparison to other local authority areas in Devon, Mid Devon has 20.8% of connections less than 30MB, the highest percentage in the CDS areas, in comparison to 10.16% in East Devon, 10.9% in Teignbridge and 3.6% in Exeter City⁹.

5.3 During the Covid-19 pandemic, restrictions were placed by national government on the nation to help reduce the spread of the disease, which included the encouragement of home working and a range of social restrictions. Many depended on digital connectivity as a replacement for their day to day work, and connecting with friends and family where physical contact was not possible. This brought to the foreground the importance of digital communications but also highlighted the inequalities faced by some communities in accessing digital connectivity.

Question 9

Which new technologies and/or digital communications are most important to you and you think we should encourage/support through the new Local Plan?

- Fibre broadband connection to new premises (Yes/No)
- Wireless internet access (Yes/No)
- Satellite signal (Yes/No)
- Other (Please state what this is)



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MEETING HOUSING NEEDS

A housing emergency – why are new homes needed?

6.1 Having a home is a basic necessity that provides shelter, security and can support health and well-being. Whether homes are owned, rented, in single occupancy or shared with others, the simple fact is that for many their home is not suitable to meet their needs and having a suitable home may not be affordable. Nationally, for many years there have not been enough new homes being built to meet our needs, and there has been an increasing gap between the price of those homes and being able to afford to buy or rent them – the cost of new homes has risen higher than wages. In Mid Devon (2019) full time employees can typically expect to spend around 9.3 times their workplace-based annual earnings on purchasing a home, higher than the England average ratio of 7.8. Average income in Mid Devon remains below the national average with a relatively low-pay economy, which means that local house prices are too high for many on low-medium incomes to afford. To improve social and economic inclusion, Plan Mid Devon will need to include policies to ensure the right number of new homes are planned across the district in the right places, and that there is sufficient choice of types of new homes (including their size and tenure and affordability) to help meet our housing needs. A question that we are often asked when preparing a new plan is ‘who are all these new homes for?’. A survey of residents in newly completed homes recently undertaken by the Council has found that 63% of moves to new build homes in Mid Devon are from within the district. 88% of moves are from either within the district or from Local Authority areas adjoining Mid Devon. Evidence shows that new houses



being built in Mid Devon are therefore providing homes for local people. High house prices and a lack of homes that are affordable and suitable to meet housing needs in Mid Devon is part of what has been declared as a national housing emergency. The charity Shelter argues that 17.5 million people nationally are trapped by the housing emergency and the high cost of housing is at the heart of this crisis.

6.2 As a rural district, we also face a number of distinct housing challenges including a highly dispersed, ageing housing stock and pockets of social isolation (often relating to age, poverty, slow broadband speeds and lack of transport). Mid Devon also has an ageing population and projections indicate that the biggest rise in future population growth will occur amongst older people. There is a need to plan to meet these changing needs and ensure that older people get the housing and support they need. Additionally, there is also a need to pay particular attention to providing affordable and social rent properties alongside a strong commitment to having low-carbon, accessible and adaptable homes.

6.3 The provision of new housing also generates significant economic and social benefits. Research undertaken by the Home Builders Federation estimates that approximately 4.3 jobs are created for every home built. There are also significant local economic benefits where homes are built by SMEs or custom and self-builders. Our research indicates that 45 pence in every £1 in custom and self-build homes is spent locally¹⁰.

6.4 The provision of housing also contributes significant funding for infrastructure improvements and towards improving local services and facilities.

What is Mid Devon's housing need?

6.5 The National Planning Policy Framework expects Councils to follow the standard method set out in Planning Practice Guidance for assessing local housing needs. The standard method identifies the minimum annual housing need figure and there is generally an expectation that the standard method will be used to inform plan preparation. The approach to calculating the standard method for housing need essentially combines two national data sets:

- 2014 based household projections¹¹
- Latest local authority affordability ratios (house prices / wages)

6.6 The formula essentially takes a 10 year average of household projection and applies an adjustment factor in order to ensure that the minimum annual housing need starts to address the affordability of homes. In Mid Devon, the standard method calculation is as follows:



6.7 Therefore, the standard method housing need calculation in Mid Devon is **365 homes per annum**. This represents the minimum housing need figure that needs to be planned for, and is less than the 393 homes per annum that is planned for in the current adopted Mid Devon Local Plan. However, there may be a potential need for the 365 homes per annum to be uplifted. For example, the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Additionally, the Government is committed to reviewing the standard methodology. It is likely that the standard method calculation could increase over time in order to deliver the Government's aspirations to deliver 300,000 homes a year nationally. The housing need calculation and number of new homes in Mid Devon will form a key part of the next stage in preparing Plan Mid Devon, together with options for how this should be planned for across the district. The current timetable is for the publication of a 'Draft Policies and Site Options' consultation report in the summer of 2023.

Meeting Affordable Housing Needs

6.8 One of the most fundamental components of the new Local Plan will be to provide more affordable housing to meet local needs and improve social and economic inclusion. As with many parts of the country, housing affordability is a significant issue in Mid Devon. Access to housing for those on lower incomes is only likely to be achieved through the provision of defined affordable housing at below market rent or price levels. The planning system therefore has an important role to play in the delivery of affordable housing and ensuring that the benefits of housing delivery go to a wider section of the local community. Affordable housing is defined as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). A full definition of affordable housing is provided in the National Planning Policy Framework but broadly, it includes two forms:

- **Affordable housing for rent** – means housing managed by a Registered Provider or Build to Rent landlord and let at subsidised levels. The Local Housing Allowance sets a rent level which can be covered by Housing Benefit or Universal Credit and is therefore affordable to all households. It is therefore an appropriate maximum rental level for new affordable housing for rent. It is important to define the difference between affordable homes (those let at an affordable rent) and social rent homes:

Social Rent – Homes let at below the market rent by a registered provider. The rent level is calculated on a legal basis according to a formula based on property values and local earnings (target rent). This is set out in the Regulator of Social Housing's Rent Standard. Typically these rents are around 50% of the local market rate.

Affordable Rent – Homes let at below market rent by a registered provider. The rent (including service charge) is set at up to 80% of the local market rent for an equivalent home.



- **Affordable home ownership** – products give a household the option to purchase at a subsidised price in various different way, either immediately or after some years of living in a property.

6.9 The majority of new affordable homes are built as a developer contribution on market housing schemes. The current local plan requires that on sites of 11 homes or more in Tiverton, Cullompton and Crediton a target of 28% affordable homes will need to be provided. On sites elsewhere of 6 homes or more a target of 30% affordable homes will apply. It is too early at this stage for Plan Mid Devon to specify what target should be applied. Although this is something that will be identified as the plan progresses, once we have more clarity of affordable housing needs and an understanding of how such targets may affect development viability.

6.10 We are preparing a new Local Housing Needs Assessment, which will provide an up to date assessment of affordable housing needs across Mid Devon and help guide how we plan for and prioritise different tenures of affordable housing in new development. The next iteration of Plan Mid Devon will consider the proportion of affordable housing that could realistically be secured from market housing schemes, and consult on a series of options for this having regard to development viability. More focused surveys of housing need can also be undertaken in parishes. These can be used to help inform the preparation of Neighbourhood Plans and community led housing schemes, including development proposals coming forward on rural exceptions sites within or adjoining villages.

Build to Rent Homes

6.11 Increasing numbers of young people in Mid Devon face the prospect of never owning their own home. Rising house prices, restricted access to mortgages and a decreasing supply of affordable housing mean that, at the age of 30, four in ten young people will rely on the private rented sector to meet their housing needs. This is double the rate of previous generations.

6.12 Build to rent homes are purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control. The private rented sector's role in providing housing in Mid Devon has increased substantially in recent years. Between 2001 and 2011 the number of privately renting households grew by 79%¹².

6.13 There is an opportunity to recognise the important role that Build to Rent can play in helping to meet the need for high quality, well-managed and secure private rented housing. Plan Mid Devon can support this through either allocating sites in the local plan for Build to Rent and/or supporting institutional investment on public land, including exploring the use of joint ventures.



Question 10

Do you think that Plan Mid Devon should explore allocating sites in the local plan for Build to Rent homes?

(Yes / No / Not sure - please provide your reasons)

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First Homes

6.14 In accordance with recent changes to government policy, Plan Mid Devon will need to provide a positive policy basis to support the delivery of First Homes. First Homes are a specific kind of discounted market sale housing, where the discount remains in perpetuity via restrictions on the property title, and it falls within the definition of 'affordable housing' for planning purposes. Specifically, First Homes are discounted market sales units which:

- a) must be discounted by a minimum of 30% against the market value;
- b) are sold to a person or persons meeting the First Homes eligibility criteria;
- c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and
- d) after the discount has been applied, the first sale price must be at a price no higher than £250,000.

6.15 The Government has made clear that First Homes are the preferred discounted market tenure and should account for **at least 25% of all affordable housing units delivered by developers through planning obligations**. This is an important consideration that will need to be factored into the evidence base for the Plan.

6.16 Planning Practice Guidance clarifies who would be eligible to purchase a First Home. In summary the eligibility requirements are as follows:

- A purchaser should be a first-time buyer
- Purchasers should have a combined annual household income not exceeding £80,000
- Purchasers should have a mortgage or home purchase plan to fund a minimum of 50% of the discounted purchase price

6.17 Plan Mid Devon will need to consider whether to apply any additional eligibility criteria in addition to the national criteria described above. This could involve lower income caps, a local connection test, or criteria based on employment status. The Plan will also have discretion to require a higher minimum discount of either 40% or 50% if it can be demonstrated that there is a need for this, and development will remain viable.





Question 11

Do you think that the new Local Plan should introduce additional eligibility criteria in addition to the national criteria referred to above?
(Yes / No / Not sure - please provide your reasons)

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Housing for older persons and people with disabilities

6.18 The proportion of people over 60 is likely to increase significantly over the next 20 years. Mid Devon's ageing population will give rise to the need for proposals for elderly person's accommodation including sheltered accommodation, care homes and nursing homes. In general terms, care and support needs increase with age. However, more people are staying in their properties longer with support and care being provided by external agents in their home. The current Local Housing Needs Assessment indicates that approximately 7% of Mid Devon's population were limited a lot in their day to day activities and 17% were limited a little in their day to day activities due to a long term health problem or disability. Furthermore, it is estimated that approximately 20.3% of households in Mid Devon include a member with a disability¹³.

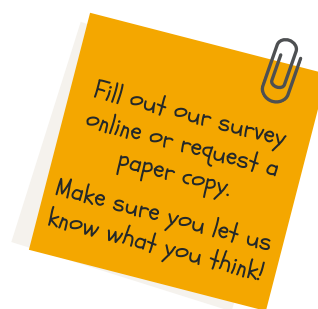
6.19 Given that future demographic changes will inevitably result in greater demands for housing suitable for older people and those with disabilities, there is a clear need for the inclusion of policies for accessible and adaptable housing.

6.20 The Council is currently in the process of preparing a new Local Housing Needs Assessment which will provide an up to date position of the latest housing needs for older people and people with disabilities.

Question 12

Do you think that Plan Mid Devon should set minimum requirements for accessible and adaptable housing?
(Yes / No / Not sure - please provide your reasons)





6.21 In addition, in order to meet the diverse needs of older people, there will be a need to provide a range of different types of specialist housing. This may include:

- Age-restricted general market housing – generally for people aged over 55 and over and the active elderly.
- Retirement living or sheltered housing – this usually consists of purpose built flats or bungalows with limited communal facilities.
- Extra care housing or housing-with-care – this usually consists of purpose built flats or bungalows with a medium to high level of care available. There are often extensive communal areas such as space to socialise or a well-being centre.
- Residential care homes and nursing homes – These have individual rooms within a residential building and provide a high level of care meeting all activities of daily life.

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Question 13

Which types of specialist housing do think we need more of and therefore should prioritise within Plan Mid Devon?
(Yes / No / Not sure - please provide your reasons)

Senior co-housing

6.22 Finally, there may be some opportunities for senior co-housing communities. These are created and run by residents based on the intention to live with a group of people of a similar age. The sites often consist of self-contained private homes as well as shared community space. Plan Mid Devon can plan for senior co-housing communities as part its wider activities in promoting custom and self-build, as there are a number of examples throughout the country where communities will be looking to build the development themselves. This provides an excellent opportunity for communities to actively plan and shape the development and ensure it fully meets their needs.

Question 14

Do you think that there is any demand for senior co-housing communities in Mid Devon and is this something we should be planning positively for?
(Yes / No / Not sure - please provide your reasons)



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Housing Diversification

6.23 Diversifying the housing market is a key aspect of the Government's housing policy. Mid Devon has long supported diversification of housing supply in order to provide a wider range of alternative housing solutions and to boost the number of small-to-medium (SME) housebuilders and providers who deliver them.

6.24 The Government is also committed to increasing the number of self and custom build homes in the country and to establish it as a mainstream option for people to choose to get on the housing ladder or when moving home. The Government has recently announced a number of initiatives as part of a Self and Custom Build Action Plan. This sets out a number of interventions to support the sector to grow including better access to mortgage finance through a new 'Help to Build' scheme in order to deliver low deposit mortgages and improve the affordability of home ownership.

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6.25 Currently, only 8% of new homes are built this way in the UK, but this form of housing is growing in popularity. The Council recognises the benefits of custom and self-build in meeting the housing needs of Mid Devon residents. Custom and self-build is also more likely to draw upon local tradespeople and supplies, supporting the local economy. The Council is particularly keen to support custom and self-build in Mid Devon District Council.

6.26 A legal definition of custom and self-build is contained within the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) although it is essentially a home built to the plans or specifications decided by the occupant. This has the potential to encourage greater innovation in sustainable and 'eco-friendly' design and construction practices.





6.27 We know that there is strong demand for this type of housing in Mid Devon. There are currently 72 entries on the Council's Register, although secondary demand sources indicate that the actual demand is significantly higher. The Council has also prepared a longer term strategic demand assessment. This identifies that there is a demand for approximately 44 custom and self-build plots per year and 4 intermediate affordable custom and self-build plots per annum.

6.28 The Council has a legal duty to grant sufficient permissions for custom and self-build plots to meet a demand equivalent to the number of plots within a given 'base period' (12 month period from each October). One of the key measures within the current local plan is a percentage policy which secures 5% on sites of 20 dwellings or more as custom and self-build. There is an opportunity within Plan Mid Devon to take forward this policy again, as well as considering custom and self-build as part of the plan's broader housing mix policies, and potentially, dedicated custom and self-build allocations.

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Question 15

In addition to requiring a percentage as custom and self-build on larger sites, what else can the Council do to support custom and self-build in Mid Devon?

Question 16

What types of custom and self-build would you like to see more of in Mid Devon?

Community Led Housing and Co-housing

6.29 Community led housing is housing that has been built or brought back into use by local people where:

- Open and meaningful community participation and consents take place through the process.
- The community group or organisation owns, manages or stewards the homes in whichever way they decide to.
- The housing development is of true benefit for the local community, a specific group of people (an intentional community), or both. These benefits should also be legally protected in perpetuity.

6.30 There are a number of different types of community led housing including co-housing, community land trusts (CLTs), community self-build, development trusts, housing co-operatives and self-help housing¹⁴.



6.31 Co-housing is essentially people coming together to build a neighbourhood that embodies particular values. It is characterised by the need to provide a balance between privacy and community, making interactions as easy as possible, residents as the decision makers based on consensus, and communities are inclusive, part of the wider community and offer opportunities for more sustainable living. The Council is working in its capacity as a 'housing enabler' to support community groups look for opportunities to bring forward potential sites for affordable housing need to meet local needs.

Question 17

What can Plan Mid Devon do to support community-led, co-housing and custom and self-build projects?

Modern Methods of Construction

6.32 The Council recognises that Modern Methods of Construction (MMC) can provide a wide range of benefits including faster construction, higher environmental standards and reduced costs compared to traditional building techniques. It is considered that MMC can help diversify the housing offered across Mid Devon, aiding affordability and sustainable design. The Town and Country Planning Association outlines a number of the benefits and challenges associated with MMC as follows:

Benefits:

- Speed of delivery
- Amenity during construction
- Build cost
- Build quality
- Environmental Performance
- Sustainability

Challenges:

- Evidence of durability
- Procurement
- Integrating planning and MMC

6.33 Modern Methods of Construction encompasses a wide range of construction techniques, all of which differ from 'traditional' building methods. This approach offers opportunities to incorporate circular economy principles by designing for the whole life-cycle of buildings, reducing waste by enabling disassembly and reuse of modular components and materials. Research undertaken by the National House Building Council (NHBC) Foundation defines MMC as including the following approaches



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- Volumetric (modular) manufactured units
- Pods (particularly bathroom and kitchen)
- Panelised systems (including open and closed panel timber frame systems, open and closed panel steel frame panels, structural insulated panels (SIPS), cross-laminated timber (CLT))
- Sub-assemblies and components (including door sets, timber I-beams, prefabricated chimneys, prefabricated dormers, floor cassettes, roof cassettes)
- Site-based MMC (including thin-joint masonry and insulated structural framework (ICF)).

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6.34 Plan Mid Devon offers significant potential to support a wide range of MMC and their implementation and this is supported in the Council's corporate plan. The Council is keen to build upon the work that is already progressing in this area, not least the Council's plans to build 14 social housing, zero carbon, modular homes in Cullompton and Tiverton. The nature of these homes means the onsite construction time is minimal and the houses are delivered complete, resulting in little disruption to neighbouring properties and allowing the residents to move in immediately.

Question 18

Do you think that Plan Mid Devon should include a policy to support Modern Methods of Construction? (Yes / No / Not sure - please provide your comments)

Question 19

What do you think we can do to raise awareness and understanding of MMC and realise the opportunities for MMC in Mid Devon? (Please provide your comments)



One Planet Development

6.35 One of the 6 top priorities we have identified for Plan Mid Devon is 'protecting and enhancing the natural and built environment, and respecting environmental limits'. Given Mid Devon is a predominantly rural district this can present an opportunity to identify appropriate innovative, sustainable and pragmatic solutions to help meet our housing needs. One option could be to introduce a move towards 'One Planet Living'. This innovative planning policy has been highly successful in Wales and is now being promoted in a number of Local Plans across England. There are currently around 48 individual smallholdings operating under One Planet Development Practice Guidance or similar guidelines in Wales¹⁵.

6.36 One Planet Developments are defined as 'development that through its low impact either enhances or does not significantly diminish environmental quality'. The Welsh Government's One Planet Development Practice Guidance indicates this might take the form of a single dwelling, land based enterprise, small group of dwellings, small planned community or eco-village larger planned community. Such developments are subject to very strict requirements to demonstrate that the development will be low impact (i.e. carbon neutral in construction and use, growing a high proportion of own food, generating own power and dealing with waste and have a land-based business that meets minimum financial needs) which can include robust evidence in the form of a management plan. A management plan could be used to set out the objectives of the proposal, timescale for the development of the site and timescale for review, and also as the basis of a legal agreement relating to the occupation of the site. The management plan might cover the following areas¹⁶:

- **Business and Improvement Plan** – to identify whether there is a need to live on the site and establish the level of the inhabitants' requirements in terms of income, food energy and waste assimilation that can be obtained directly from the site.
- **Ecological footprint analysis of the development** – to provide a notional figure for the land area required to support an individual, family or a community in terms of food, resources, energy, waste assimilation, and greenhouse gases mitigation.
- **Carbon analysis of the development** – to demonstrate that the development will achieve zero carbon status in terms of the construction and use of the development.
- **Biodiversity and landscape assessment** – a baseline assessment of biodiversity and landscape character should be undertaken and a management plan to enhance the features of importance prepared.
- **Community impact assessment** – to identify potential impacts on the host community (both positive and negative) and provide a basis to identify and implement any mitigation measures that may be necessary.
- **Transport assessment and travel plan** – to identify the transport needs of the inhabitants and propose sustainable travel solutions.



6.37 There is also a need to carefully monitor One Planet Developments and the cumulative impact of these developments over time. Nevertheless, it provides a potential solution to addressing the many challenges currently facing rural areas and we would like to find out what you think about bringing this opportunity to Mid Devon.

Question 20

Do you think that Mid Devon should introduce a 'One Planet Development' policy that would provide scope for modest scale low impact, land based developments in the countryside, subject to strict requirements? (Yes / No / Not sure - please provide your comments)

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Gypsy and Traveller Accommodation

6.38 National Planning Policy makes clear the requirement for local authorities to assess the need for traveller sites and to plan for these in a sustainable manner over a reasonable timescale. It is in this context of national planning policy and legal duties placed through the Public Sector Equality Duty that local authorities have a responsibility to develop fair and effective strategies to meet the housing needs of travellers through the identification of land for sites.

6.39 The current Local Plan includes provision for 25 new pitches for Gypsies and Travellers as part of major housing developments on the edge of Tiverton, Cullompton and Crediton and planning permission has recently been granted for 5 of these pitches on land at Pedlerspool, Crediton. These locations are considered the most sustainable for new sites, although the Local Plan allows for other sites in suitable locations elsewhere in Mid Devon, which can include sites in rural or semi-rural settings. National planning policy for travellers' sites provides scope for a rural exception site policy to enable small sites to be used specifically for affordable travellers' sites in rural communities that would not normally be used for traveller sites and where there is a lack of affordable land to meet local traveller needs. A rural exceptions site for travellers should be maintained for travellers in perpetuity and address the needs of the local community (such as current residents or who have an existing family or employment connection).

6.40 The Council is in the process of preparing a new Gypsy and Traveller Accommodation Assessment (GTAA), which will identify future housing needs for the travelling community (including travelling showpeople). This can include permanent residential sites, the need for transit sites (sites intended for short term use and with a maximum period of stay) and also the need for emergency / negotiated stopping places. The new GTAA will be used to help inform the preparation of Plan Mid Devon. The preparation of the new Local Plan provides an opportunity to identify new sites for Gypsy and Traveller accommodation as part of larger developments at the main towns or in suitable sustainable rural or semi-rural locations elsewhere in the district, together with policy for windfall sites to come forward in suitable locations in the district. Where new sites are provided in larger developments or in off-site locations Plan Mid Devon can set out requirements for how and when they will be delivered.



6.41 Travelling showpeople have their own requirements for sites ('yards') to provide homes and also to accommodate vehicles and equipment. Plan Mid Devon could also seek to identify sites for travelling showpeople in the district.

6.42 The Council works proactively with landowners, developers, registered providers and the travelling community to identify and bring forwards opportunities in the district that can help secure the delivery of new sites and pitches to provide homes for Gypsies, Travellers and Travelling Showpeople. The Council also runs a forum for Gypsies and Travellers in Mid Devon which provides an opportunity to discuss the provision of pitches in the district, welfare needs and other matters of interest to the traveling community.

6.43 The Council also maintains a waiting list for Gypsy and Traveller households to register their need for a pitch in Mid Devon. Although there is no public travellers site or pitches that are currently available in Mid Devon the waiting list can be used to help keep the Council better informed of current need and also in developing a policy for the future allocation of pitches once these become available on sites allocated in Local Plans.



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Question 21

Please tell us where you think Plan Mid Devon should prioritise new permanent sites to provide homes for Gypsies and Travellers?

- Identify sites at the three main towns – Tiverton, Cullompton and CREDITON (Yes/No)
- Identify sites outside the main towns at rural and semi-rural locations (Yes/No)
- Include a policy for rural exceptions sites to meet local traveller needs (Yes/No)



Question 22

Are you aware of a site that you think may be suitable to provide homes and Gypsies and Travellers, a transit site or emergency / negotiated stopping place, or a yard for Travelling Show People?

(Yes / No - if yes, please tell us where the site is and which use you think it might be most suitable for)



Improving the housing market, reusing developed land and optimising housing densities

6.44 To give the best prospect that the new homes we need are provided in the right places and at the right time we need to make sure the new Local Plan includes a choice of locations and sites for that development to be able to take place. There are a number of issues that stem from this which will need to be considered through the preparation of Plan Mid Devon.

6.45 The Government's white paper 'Fixing our broken housing market' (2017) sets out plans to boost the supply of new homes in England and includes measures to build homes faster and diversify the housing market. Measures to help improve the supply of new homes are also included in the National Planning Policy Framework. These include a requirement for plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than 1 hectare. Having more small and medium sized sites can make an important contribution to meeting the area's housing requirement. They can be developed more quickly, since they may have fewer constraints and require less supporting infrastructure. They can help provide a greater choice of available homes and can also support local builders in a market which is dominated by a small number of national developers. National Planning Policy also makes clear the need for the effective use of land, such as making as much use as possible of land that has previously been developed ('brownfield' land).

6.46 The Council has recently undertaken a 'call for sites' to find out where land is available across the district for potential development. Where land has been brought to our attention this will be assessed over the coming months to understand its suitability for development and how capable it is of being brought forward. The Council has also undertaken an 'Urban Capacity Study' to look at potential opportunities for reusing brownfield land in the main towns and maintains a brownfield register. Plan Mid Devon will need to include policies to optimise the use of land through the use of a range of density standards for new housing in town centres and other parts of the district, which can be in relation to the level of accessibility by public transport and achieving high quality design. All of this work will be used to help inform the options for site allocations in the new Local Plan.





SUPPORTING OUR BUSINESSES AND JOBS

Economic profile

7.1 The Mid Devon economy is typified by high rates of employment - of the 47,100 residents (ONS population estimates 2017) aged between 16 and 64, 85% were economically active. This is significantly higher than the South West and the UK rates. However, many of the jobs in Mid Devon are low waged and low skilled - average work place earnings are 11% lower than the national average. The percentage of Mid Devon workforce holding a degree or higher qualification (NVQ 4+) at 31.4% is well below the national average. Mid Devon has strong links to surrounding areas, particularly to Exeter to the south, with over a third of the resident population commuting out of the district for work. Mid Devon is relatively strong in manufacturing, but its economy is dominated by traditionally low productivity (GVA) sectors such as retail, distribution and agriculture, which means that opportunities for high wage jobs are limited. There are high levels of self-employment and a large number of micro-enterprises particularly in the rural areas. Of the 4,510 businesses in Mid Devon, 92.2% are micro businesses with less than 10 employees. While Mid Devon has a high 3-year business survival rate, the business birth rate is relatively low compared to national and regional averages.

Economic strategy

7.2 An 'Economic Strategy for Mid Devon 2019 – 2024' includes a vision where, amongst other features, commercial opportunities are embraced for the benefit of the district and emerging businesses are able to develop and thrive; and where a successful economy, including emphasis on low carbon, agriculture and high-tech, is supported by a highly skilled workforce. The Strategy outlines five key areas for action: Employment and Skills; Place; Infrastructure; Hi-Tech, Innovation and Green Energy; and Agriculture, Food and Drink.



Post-Brexit and pandemic

7.3 The United Kingdom formally left the European Union on 31st January 2020 and a transition period ended on 31st December 2020. Rules governing the new relationship between the United Kingdom and the European Union took effect from the 1st January 2021. While there have been some notable immediate impacts on certain sectors of the economy and supply chains nationally, there remains longer term uncertainty, including for financial and farming sectors, the latter being under additional pressure from the effects of climate change. The national economy has also been impacted by the COVID-19 pandemic through shutdowns and the disruption these have caused. In Mid Devon, the effect of the pandemic has had, and will likely continue to have, an enormous impact on the local economy. Devon County Council modelling evidence suggest that the Mid Devon economy will retract by around 10% (roughly 3% more than the rest of the UK) and it anticipates a 5-year recovery journey¹⁷. While the district experienced a rapid increase in unemployment at the beginning of the pandemic, this has now reduced in line with the rest of the United Kingdom and remains low. However, there are pressures in the labour market and increases in job vacancies. Underemployment and poor skilled jobs will continue to be a concern in the district. The Council is in the process of commissioning an update to the Economic Development Needs Assessment, which will take into account economic uncertainty as a result of Brexit and COVID-19. The findings of this study will inform the next stage of Plan Mid Devon – Draft Policies and Site Options.

Green economic recovery

7.4 The new Local Plan will need to be informed through an up to date economic needs assessment that can identify future requirements for employment land in the district. Plan Mid Devon will also provide the opportunity to plan for and support a greener, more inclusive, recovery of the economy post pandemic. The Government has indicated that this can be science led, clean, resilient and could create jobs in new industries while ensuring we address challenges in climate change, public health and biodiversity¹⁸. Plan Mid Devon provides an opportunity to embrace measures to support a just transition from a carbon intensive economy to a net-zero future, which can also include renewable energy and embedding the circular economy principles of designing out waste and pollution, reusing and recycling products and materials, moving away from the current 'take, make, consume and dispose' culture, and for entrepreneurs to find innovative ways of recovering value from waste streams and regenerating natural systems¹⁹. The Government recently published its paper 'Build Back Better: our plan for growth' (March 2021). This takes forward the Government's Plan 'Ten Point Plan for a Green Industrial Revolution' (2020)²⁰ and shows how the UK can make the most of the opportunities presented by a shift to net-zero. 'Build Back Better' is also about learning lessons from the COVID-19 pandemic and opportunities for growth from leaving the European Union, taking a transformational approach and tackling long term problems to deliver growth that creates high quality jobs across the UK. The focus will be infrastructure, skills and innovation.



Question 23

How do you think we should plan for a green economic recovery in Mid Devon? Please rank what you think our priorities should be.

- **Innovative and high growth sectors (e.g. pharmaceuticals, aerospace, creatives, financial / professional and business services and emerging industries such as Artificial Intelligence)**
- **Support training opportunities in clean and green economic activities**
- **Renewable / clean energy**
- **Farm diversification to support the processing and sale of food locally**
- **Protecting the natural environment to sequester carbon**
- **Green public transport, cycling and walking**
- **Greener more energy efficient buildings**
- **Refurbishing and retrofitting properties to meet energy standards**
- **Repurposing waste streams**
- **Other (please state what this is)**

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Helping our businesses grow

7.5 Mid Devon has a number of business parks which are mostly concentrated around the edges of the three main towns and along the M5 corridor at Junctions 27 and 28, and at Willand. Occupancy rates are extremely high and it is rare that units become available. Those that do, tend to be filled again very quickly. There is therefore a need to bring forward new employment land in the district and to maintain a pipeline of sites that are available. The current Local Plan identifies a range of employment sites that will become available as part of planned developments in Tiverton, Cullompton and particularly in the proposed Culm Garden Village. It makes provision for 147,000 square metres of commercial development floorspace (including 7,000 square metres of non-food retail) across a few, but relatively large site allocations in terms of the total commercial space across the district. However, the delivery of the schemes can be affected by the need for supporting infrastructure and long lead in times, which can mean that local businesses are being constrained in their ability to grow and expand, and which may seek to move out of the district to larger premises where sites are available elsewhere. The Local Plan makes further provision for commercial floorspace at Junction 27 for a high quality tourist and leisure focussed development. The Strategy has identified that an underlying issue facing Mid Devon is that there is no natural progression of business space for businesses within the district as they grow. This is true for businesses of all sizes, but there is a particular lack of incubator space across the



district and “next step” space for incubator tenants to grow into. One of the key reasons for the success of the Hitchcocks Business Park near Willand is that the units produced are extremely flexible and adaptable in how they can be split or combined to meet the needs of a wide variety of businesses. The need also continues for larger units for medium-sized businesses wishing to expand, or move into. A key issue for Plan Mid Devon will be to ensure the delivery of commercial development goes hand in hand with housing development, to assist job opportunities locally which are high skilled and well paid, and to reduce commuting to work place destinations outside of the district (which would hinder our ambitions of moving towards net zero carbon emissions).

7.6 The preparation of Plan Mid Devon provides an opportunity to consider how other forms of work space can be supported through a new Local Plan. This could, for example, include identifying a site for co-working space (such as a communal office and meeting rooms shared by different companies), or a policy to support proposals for live-work units (units of living accommodation designed with work space for the occupier). Low cost, flexible and temporary accommodation might also be achieved through providing space for shipping container / pop-up enterprise facilities.



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Question 24

Which of the following ways should the new Local Plan help commercial development across the district?

- **Continue to allocate larger employment estates at a few locations (Yes/No)**
- **Place greater emphasis on smaller employment sites that are relatively free from major infrastructure constraints and are capable of being delivered more quickly (Yes/No)**
- **Require a proportion of all employment sites to be developed in small land parcels that can be attractive to micro, small and medium sized enterprise (Yes/No)**
- **Identify opportunities for co-working space (Yes/No)**
- **Include a policy for Live-work units (Yes/No)**
- **Space for low cost, flexible and temporary accommodation (Yes/No)**
- **Other (please state what this should be)**



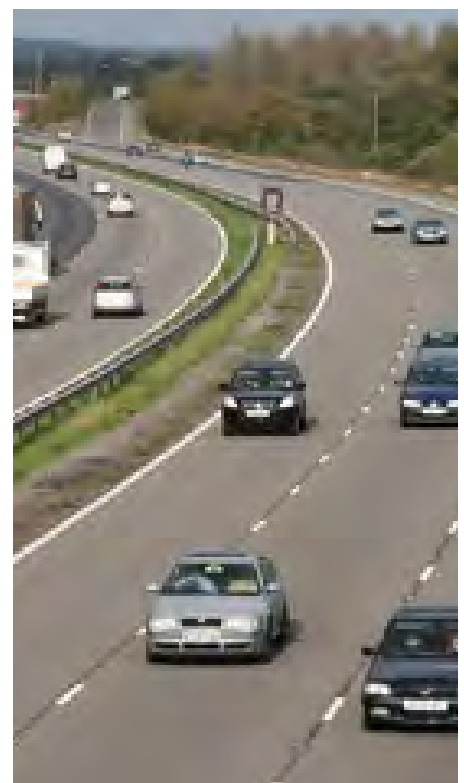
INFRASTRUCTURE AND HOW WE TRAVEL

Infrastructure

8.1 A key role of Local Plans is to align the growth that is planned for an area with the infrastructure that is needed to support that growth, helping to create stronger, more sustainable communities. Plan Mid Devon will need to identify and co-ordinate the provision of infrastructure across the district. This will require engagement with infrastructure providers and operators (including Highways England, the Local Highways Authority and Network Rail, Local Education Authority, Environment Agency, Healthcare Trusts, and organisations responsible for waste management, utilities, and digital / telecommunications. Each are explored further below, with the exception of digital / telecommunications which is discussed in section 5 to this Issues Paper.

Funding, phasing and viability

8.2 The existing Local Plan 2013 – 2033 seeks to ensure that new development is served by appropriate and timely delivery of infrastructure. The Plan's approach for strategic allocations at North West Cullompton and East Cullompton provides traffic solutions to improve motorway junction capacity and reduce traffic through the town centre. In addition, it makes



provision for facilities such as schools, green infrastructure and community halls, as well as care homes or other provision for older people in recognition of the district's aging population and its associated needs. The plan also guides development to locations where there is sufficient sewerage capacity, or require that increased capacity will be provided. Plan Mid Devon will provide an opportunity to review this, and where new development is planned will investigate what new infrastructure is needed. The Council will continue to work with providers and developers to ensure that new development is served by necessary infrastructure in a timely and effective fashion. Plan Mid Devon will need to help facilitate a comprehensive, evidence-based infrastructure package to support new and existing development across the area, including the three main towns where new development is likely to continue to be focussed. This is currently being identified through a collaborative infrastructure planning process which is ongoing and will culminate in a Plan Mid Devon Infrastructure Delivery Plan which reflects the distribution and level of development proposed within the Plan. Where possible, the Council will also investigate opportunities to forward fund infrastructure.

8.3 Plan Mid Devon will need to set out the contributions expected from development towards infrastructure and affordable housing. These will need to be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability. Mid Devon District Council has not implemented a Community Infrastructure Levy (CIL), and therefore maintains a charging regime through Section 106 planning agreements placed on development. However, there is potential for future reforms to the planning system to replace CIL and S106 planning agreements with a new national infrastructure levy.

8.4 The Council is proactive in securing other sources of funding, including working with Homes England and other government agencies. The Council has been highly successful in recent years in securing funding for infrastructure, including through the Government's Housing Infrastructure Fund. The Council is currently working with Devon County Council in bids for funding through the 'Housing Infrastructure Fund' to forward fund road infrastructure improvements at Cullompton (town centre relief road) and at Tiverton (Eastern Urban Extension phase 2 junction on the A361). Plan Mid Devon will continue to support measures for funding through establishing a positive, proactive and robust development strategy for the area, looking forward to 2043 and beyond.

8.5 The policy requirements in the new Local Plan for securing infrastructure should not undermine the deliverability of the plan. Therefore the new Local Plan will be subject to a viability appraisal. Planning Practice Guidance makes clear that viability should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. A full, detailed, plan-wide viability assessment will take place as Plan Mid Devon progresses, although at this early stage in the plan-making process, we welcome engagement with landowners, developers, and infrastructure and affordable housing providers to understand existing and likely future viability issues.

Question 25

What do you consider to be the key infrastructure issues that Plan Mid Devon needs to address?



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Transport

8.6 The Council will work closely with Devon County Council, Highways England (to be renamed National Highways) and Network Rail to identify transport infrastructure requirements needed to support planned development in Mid Devon.

8.7 Devon County Council is the local transport authority and is responsible for developing transport strategies and policies, and provides expert advice on new developments and schemes included in local plans. This includes the planning of new roads, together with provision for walking and cycling, and bus services.

8.8 Highways England is responsible for the operating, maintaining and improving the motorways and major A-roads. Plan Mid Devon will need to carry forward provisions to secure improvements to the motorway at junctions 27 and 28 through continued engagement with Highways England.

8.9 Network Rail is responsible for managing the railway network. The Council is currently engaged with Network Rail to secure the building of a new railway station at Cullompton.

Education

8.10 Devon County Council is the Local Education Authority and is responsible for supporting the development of an overarching strategy for education provision within Devon, including Mid Devon. This includes the strategic planning and commissioning of school places, and leading on Children Services Infrastructure requirements. Technical advice from Devon County Council, including its Education Infrastructure Plan, will be used to help guide the planning of education facilities in relation to needs arising from new development across the district. Plan Mid Devon can include policies setting out when new or expanded education provision is needed and how it will be paid for through developer contributions and other funding sources.

Healthcare

8.11 The Council will continue to work closely with the NHS in looking at what future needs may be placed on healthcare infrastructure (including GP practices, healthcare centres, dentists and hospitals) arising from development that is planned on site allocations identified in the new Local Plan. This can help make sure the impacts of that development on healthcare services are appropriately mitigated. Engagement with the NHS on the preparation of the new Local Plan will provide the ability for the NHS to build forecast demands on healthcare services into its capital programme and also an opportunity for it to make requests to the Council, through the new local plan and where developer contributions are sought towards infrastructure, for additional healthcare provision arising from that planned new development. Technical work will be undertaken to help us better understand what new healthcare facilities (e.g. GP practices) will be needed over the lifetime of the new Local Plan.



Other Community facilities

8.12 The future planning of Mid Devon will need to include provision for cultural infrastructure and other community facilities in new development, where this is needed to support the creation of successful sustainable communities and residential environments. This could include local shops, post offices, community halls, cultural buildings, public houses, places of worship, cemeteries and allotments. The new Local Plan will set out what the requirements will be, taking account of existing provision and cumulative impact of new development. Developers will be expected to contribute fairly towards, or bear the cost of new or improved community facilities where it is appropriate for them to do so, subject to viability assessment where this is needed. The new Local Plan will also be able to include policies to help protect existing community facilities from their development for other uses, where their loss would damage a settlement's ability to meet its day to day needs or result in the total loss of such services to the community, unless the facility is proven to be no longer economically viable.

Utilities – electricity, gas, water, sewerage

8.13 Plan Mid Devon will be informed through engagement with the utilities infrastructure providers for the area, including Western Power Distribution (electricity), National Grid (electricity and gas) and South West Water (water supply and sewerage). This will help the Council understand the capacity of utilities infrastructure and its ability to support planned new development, and also the utilities providers in preparing their plans for infrastructure improvements. Where feasible, renewable energies, sustainable drainage options and greywater reuse systems will be prioritised.

HOW WE TRAVEL

Travel to work area

8.14 The majority of Mid Devon's district lies within the Exeter 'Travel to Work Area' (as shown above). At the time of the 2011 census, 37% of the workforce commuted out of the district for work, of which over 50% worked in Exeter. Although there is also a flow of workers from other districts into Mid Devon, there is a net outflow of 8,207 residents. The difference between residence-based and workplace-based average earnings indicates that workers tend to be commuting to more highly paid jobs outside the district. In total, 75% of those who work in Mid Devon also live in Mid Devon, while only 57% of working residents of Mid Devon work in Mid Devon. Once new data is available (including from the 2021 Census) this will provide an opportunity to find out if travel to work patterns have changed, and this can help inform Plan Mid Devon.





8.15 Car travel can also be influenced by the availability of other choices of other means of getting from 'a' to 'b'. This can include safe, convenient and well connected footpath and cycle routes, and also public transport through bus and rail services. In terms of rail, Mid Devon is connected to the main line at Tiverton Parkway, and a new rail station is planned at Cullompton, while the Tarka line passes through the west of the district with local stations at Cridton, Yeoford, Copplestone and Lapford. Bus service provision varies significantly across the district with some villages benefitting from a daily service and others having no service at all. This in turn creates a reliance on private car use.

8.16 The National Planning Policy Framework promotes sustainable transport and makes clear that transport issues should be considered from the earliest stages of plan-making. Where new development is planned through Plan Mid Devon there will be an opportunity to prioritise, where possible, provision for active travel (walking and cycling) through new routes which are safe and attractive to users, and also to secure design and layouts that allow provision of efficient public transport services.

Parking provision in new development

8.17 On-road transportation accounts for approximately 30% of Mid Devon's overall emissions and per capita emissions are significantly higher in Mid Devon compared to surrounding authorities, which in part is due to higher transport emissions (longer distances to travel and fewer sustainable options). It is therefore important to consider measures to minimise private car use as much as possible. One important measure is the appropriate provision of car parking on new development as this can significantly determine household car ownership decisions which in turn is the strongest predictor of car use.

8.18 Establishing appropriate parking standards is therefore an important issue for new development. The Council's adopted Local Plan applies a minimum residential parking standard of 1.7 spaces per dwelling based on car ownership levels in Mid Devon. As electric vehicle take up continues to increase, on-road transportation emissions will fall, and therefore car usage and car ownership will become a less significant issue over time (in terms of emissions). However, currently electric vehicles make up only a very small proportion of all vehicles (approximately 0.5%) in Mid Devon. In the short – medium term, Plan Mid Devon will need to respond to this proportion, whilst providing an aspirational and forward looking



strategy for the future. The new Local Plan can also provide an opportunity to review parking standards in relation to the number of parking spaces needed for each new dwelling (e.g. based on household size or number of bedrooms), the size of parking spaces, and in what form parking provision should be provided (e.g. private spaces or shared parking courts). This will also need to have regard to statistical trends, such as fewer young people choosing to learn to drive (owing to costs and environmental concerns) and prevalence of alternative transport methods such as shared mobility of car clubs.



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Question 26

Please select your top three priorities for the new Local Plan to address in a review of parking standards.

- The number of spaces
- The size of each parking space spaces
- Providing private parking spaces
- Providing shared parking areas
- Charging facilities for electric vehicles
- Other (please state what this is, and tell us why)

Transitioning to electric vehicles

8.19 The Government has announced a ban on the sale of new petrol, diesel and hybrid cars from 2035, five years earlier than previously planned. Plan Mid Devon will therefore need to help facilitate the transition to hydrogen and electric vehicles across Mid Devon. The existing Local Plan already includes minimum standards for the provision of electric vehicle charging infrastructure, although the Council is committed to taking this further. Current evidence indicates that the number of ultra-low emission vehicles is rising rapidly in Mid Devon and therefore there is a need for planning policy to require a higher proportion of EV charging points (not just EV ready) within all new housing and commercial developments.

8.20 Another key issue associated with increasing the number of electric vehicles is that this will add significantly to electricity demand and place pressure on the UK's grid network. An electric vehicle uses, on average, the same volume of electricity as a domestic house. It is therefore crucial that planning policy supports decarbonisation of electricity. There is an opportunity for Plan Mid Devon to support renewable energy generation and energy storage and management infrastructure (See Section 4 – Climate Emergency).

8.21 Finally, Plan Mid Devon could also support the uptake of fast electric charging at accessible locations. For example, supporting fast charging infrastructure at petrol filling stations and in public car parks. It can also seek to include a requirement for new residential and non-residential developments to include charging points for electric vehicles or ducted circuits in suitable positions to enable electric vehicle charging points to be easily installed in the future.

Question 27

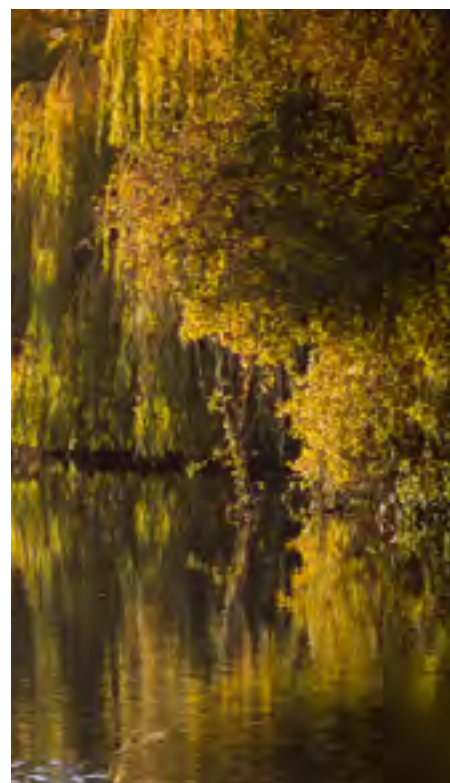
Do you have any comments on how Plan Mid Devon can help the transition to electric vehicles?



OUR NATURAL AND HISTORIC BUILT ENVIRONMENT

Landscape

9.1 Mid Devon's landscape is a valuable resource and one of our greatest assets. Protecting and enhancing the special character of the landscape that contributes towards local identity and distinctiveness is an important part of the planning process and our quality of life. Protected landscapes in Mid Devon include the Blackdown Hills Area of Outstanding Natural Beauty (AONB), and part of the district at Cheriton Bishop that is within the Dartmoor National Park. The Exmoor National Park is situated to the east of Mid Devon. Other features contribute to Mid Devon's landscape and its sense of place, including the Grand Western Canal (which is a Country Park and a Local Nature Reserve (LNR)), Sites of Special Scientific Interest (SSSI), 2 nature reserves managed by Devon Wildlife Trust and areas designated as Local Green Space.





9.2 A Landscape Character Assessment for Mid Devon was published in 2011. This subdivides the district into 12 landscape character types and shows that Mid Devon has a diverse landscape, ranging from the intimate valleys and surrounds of the River Exe, to the Blackdown Hills with its unique geology, to the low lying flat agricultural area known locally as the Mid Devon Farming Belt. The Mid Devon Landscape Character Assessment has been used to inform the current Local Plan including policies for protecting landscapes and requirements for landscaping measures to be included where land has been identified for development. The current Local Plan seeks to ensure that major development proposals within or adjoining the AONB or National Parks are only permitted in exceptional cases. It is our intention to undertake a new Landscape Character Assessment, which will be used to inform the preparation of Plan Mid Devon.

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9.3 Plan Mid Devon will need to balance the protection of the landscape with measures to mitigate the effects of climate change and a move to net-zero, where the transition to a low carbon future can be achieved through the development of renewable technologies, which are often located in rural areas.

Local Green Space

9.4 Local green spaces are areas that are identified by communities as being of particular importance to them and which they feel should be protected. They are designated through either Local Plans or Neighbourhood Plans. For an area to be designated it needs to be in reasonably close proximity to the community it serves; demonstrably special to a local community and hold a particular significance (e.g. because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife), and to be local in character and not an extensive tract of land.

9.5 There are a number of local green spaces designated in the current Local Plan and in the Cullompton Neighbourhood Plan. Emerging Neighbourhood Plans for Cridton, Tiverton and Silverton also include proposals for local green spaces but these have yet to be designated.

Local Plan Policy DM24	Cullompton Neighbourhood Plan Policy EN03		
Millennium Green, Bampton	Bilbie Close/Crow Bridge	Hayman's Close	Meadow Lane
Joan's Orchard, Bickleigh	Bockland Close	Hayman's Green	River Mead Play Area
Recreation Ground, Bickleigh	Clover Drive	Headweir Road 1	Saxon Way/Windsor Close
Nick's Farm Field, Bradninch	Cross Parks	Headweir Road 2	St Andrew's Hill
Millennium Green, Sandford	Culm Lea Play Area	Jubilee Gardens, Willand Road	Swallow Way
Millennium Green, Thorverton	Forcefield Road	Knightswood Play Park	Tufty Park
Sports Field, Witheridge			





Question 28

Are there any other areas in Mid Devon that you think should be designated as a 'Local Green Space', and please tell us why?

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Biodiversity

9.6 The World Wildlife Fund describes 'biodiversity' as all the different kinds of life that you will find in one area, which includes the variety of plants and animals that make up our natural world. Biodiversity is in long-term decline, with habitats becoming increasingly fragmented and degraded as a result of changing land use and agricultural practices. Analysis by the Natural History Museum²¹ suggests the United Kingdom has just 53% of its biodiversity remaining as a result of human activity, and is one of the most depleted countries in the world in terms of biodiversity, whilst the State of Nature report (2019) asserts that within the last forty years, more than 1 in 7 wildlife species have either been threatened with extinction, or have become extinct. National policy seeks to reverse this trend, halting overall biodiversity loss and reintroducing well-functioning and coherent ecological networks. Healthy biodiverse ecosystems have multiple benefits. These include the breakdown and absorption of pollution and providing an essential, nature based part of the solution to climate change. They can also form a large part of our culture and local identity and can support our local farming and tourism economies in Mid Devon.

9.7 National planning policy includes an environmental objective, which states that local plans should protect and enhance the natural environment. Plans should help to improve biodiversity, minimise waste and pollution and use natural resources prudently, thus encouraging developments whose primary objective is to conserve or enhance biodiversity. Additionally, local plans should contribute to minimising impacts on and providing net gains for biodiversity. Developments which cause deterioration or loss of irreplaceable habitats should be refused unless there are wholly exceptional reasons.

9.8 There are no designated European sites (which include Special Protection Areas 'SPAs', Special Areas of Conservation 'SACs', and Ramsar Sites) within Mid Devon. However, there are 11 within 10 km of the district, including the Culm Grasslands, Exe Estuary, Exmoor and Quantock Oakwoods East Devon Heaths, East Devon Pebbled Heaths, Exmoor Heaths, South Dartmoor Woods, Holme Moor and Clean Moor, Dartmoor SAC. Mid Devon is also within the transition zone of North Devon Biosphere Reserve, a UNESCO site on the coast of North Devon. The transition zone stretches across Mid Devon's rivers and streams that extend to the North Coast of Devon.



9.9 The Culm Grasslands is a cluster of sites designated as a Special Area of Conservation ('SAC') and is the closest European site to Mid Devon District situated immediately adjacent to the north western boundary. A part of the Culm Grasslands is cut through by the North Devon Link Road. It is designated primarily for the protection of the Marsh Fritillary butterfly and represents the largest cluster of sites for this species in the south-west peninsula. Given its context, this site in particular could be affected by development within Mid Devon District through increased traffic on the North Devon Link Road which in turn may lead to increased nitrogen oxides that can impact the important habitat in this location for the Marsh Fritillary butterfly. For the current adopted Local Plan a Habitat Regulations Assessment was undertaken to ensure the Plan would have no likely significant effect from the proposals and policies (either alone or in combination with other plans or projects) on the integrity of European sites including the Culm Grasslands SAC. Plan Mid Devon will be subject to further Habitat Regulations Assessment to find out whether significant effects from planned new proposals and policies are likely on the Culm Grasslands and other European sites.

9.10 The current Local Plan has policies that protect, enhance and conserve biodiversity. They support habitat creation, support opportunities which enhance species populations and link habitats. It also has policies that protect and encourage enhancement of international, European, national and local designated wildlife sites. Furthermore, policies discourage habitat fragmentation and developments which would cause significant harm to biodiversity and would thus have to implement compensation measures.

9.11 Plan Mid Devon provides an opportunity to set out policy to help deliver net gains in biodiversity. Biodiversity Net Gain is a concept that seeks to ensure development leaves biodiversity in a better state than before. Biodiversity Net Gain is already part of the National Planning Policy Framework (NPPF) but this does not specify how much is required. A minimum mandatory national requirement for 10% Biodiversity Net Gain is expected to become law in 2023 through the Environment Act, with the biodiversity measured through a clear standard metric. This 10% should not be viewed as a cap on the aspirations of developers who want voluntarily go further, and there is an opportunity for Plan Mid Devon to include a policy setting out where more than 10% may be required. Where possible biodiversity should be delivered on site. In order to reduce significant harm to existing biodiversity levels, it is likely that a mitigation hierarchy will be applied. This would first aim to avoid loss of biodiversity on site, then to mitigate if loss is necessary, next to ensure that any compensation for loss takes place on-site and finally only off site as a last option. Following the hierarchy would mean that genuine attempts must be made on site to reduce impacts on biodiversity as a result of development.

9.12 The Council has recently undertaken a 'call for sites' to find out where land is available across the district for potential strategic habitat creation or enhancement, such as part of Devon's Nature Recovery Network (explained in more detail later in this section) or for biodiversity net gain off-site habitat banking. Over the coming months, land that has been brought to our attention will be assessed to gauge its suitability.





Question 29

What do you think is the minimum level of Biodiversity Net Gain that the new Local Plan should set? (please select one)

- **Only the minimum mandatory national requirement for 10% Biodiversity Net Gain**
- **More than 10% Biodiversity Net Gain? If so what do you think this should be and why?**

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Habitats and climate change

9.13 Carbon sequestration in plants is the long-term storage of carbon within living biomass. Lakes and wetlands can lock up carbon within sediments and vegetation but high levels of nutrients, such as phosphorus and nitrogen, from neighbouring land can reverse this process. Looking after and expanding areas of wildlife habitat is an effective way to capture and protect the carbon naturally sequestered in soils, semi-natural grasslands, scrub, trees, and the complex structure of a high biodiversity habitat such as woodland. Individual trees can capture large amounts of carbon, moreover trees that grow faster start absorbing carbon earlier but have a shorter lifespan. In contrast, slower growing, longer living trees (100-200 years), also sequester carbon for longer. The ability to capture carbon declines over time, but old woodlands are substantial and important carbon stores. Not all tree species will be adaptable enough to cope with climate change and non-native species and cultivars may be required. Where possible, ecological requirements of dependent species should be taken into consideration, and existing trees protected to help retain the carbon they have absorbed.

9.14 The Government's plan and recommendation is for the UK to plant around 30,000 hectares of new woodland every year until 2050 to help with carbon absorption. Approximately 10% of residual GHG emissions could be absorbed this way. Additionally, trees in urban areas, wetlands and riparian woodland provide filtration of excess nutrients and sediments, diffuse airborne particulates and reduce soil erosion, minimising water pollution. Trees can also moderate temperatures, acting as windbreaks and providing protection from the sun and rain. However, tree planting and afforestation alone are not enough to achieve 'net-zero', this needs to be combined with other measures.



Trees

9.15 Tree and woodland planting is an effective and relatively simple method of helping to mitigate the effects of climate change. Trees provide wildlife corridors, shade and reduce flooding. Moreover, woodlands can help increase biodiversity, air filtration, carbon absorption and flood protection. The UK has only 13% of its land covered in woodland and the Government has set a target to extend UK's woodland cover to 17%, ideally 19% by 2050. In the move to achieve net-zero carbon emissions, the Government has committed to plant 11 million trees by 2022, and has published The England Trees Action Plan (May 2021) to further encourage tree planting. The Planning White Paper (Aug 2020) and 25 Year Environment Plan (2018) include proposals for tree-lined streets, better tree coverage and tree planting initiatives. National Planning Policy (July 2021) states that planning policies and decisions should ensure that new streets are tree-lined and that trees are incorporated elsewhere in developments (parks, etc.). Furthermore, the Woodland Trust's 'Emergency Tree Plan for the UK' (Jan 2020) recommends including a target of 30% tree cover for new development land and suggests planting at least 3 new trees for each tree that is cut down. However, it is essential that the principle of 'right tree, right place' is adopted to avoid harm to other habitats, archaeological sites, and underground services.

9.16 Current Local Plan policies give protection to ancient, veteran and mature trees and ensure that new development respects those important characteristics. The policies also encourage onsite and offsite tree-planting, and the protection of Tree Preservation Orders (TPOs). There are a number of TPOs in Mid Devon and new local plan will include policies to preserve these.

Trees and public health

9.17 Research has shown that something as simple as seeing trees on your street, improves mental health. Spending time in the natural environment helps with overall well-being, reduces respiratory-based diseases, helps to develop and maintain a healthy immune system and encourages physical activity. This can also reduce anxiety, stress, depression and can combat loneliness. The National Planning Policy Framework (July 2021) makes clear that planning policies and decisions should ensure that new streets are tree-lined, and that opportunities are taken to incorporate trees elsewhere in developments.



Economic benefits of trees

9.18 Trees in towns and cities are of great value and can have an important role in making city and town streets liveable and pleasant, attracting greater levels of footfall. This can in turn help improve the economic viability of town centres. Trees can also help moderate temperatures, alleviate storm water runoff and stop harmful pollutants from roads and pavements reaching water courses. They sequester carbon and reduce particulates from car exhaust fumes from reaching the atmosphere. Trees also provide an important source of nectar and pollen for bees, bats and other pollinators. It is estimated that replacing natural pollination with artificial pollination would cost the nation £1.8bn²³ annually. Without trees the cost of mitigating the consequences of our way of living would be much higher.

Trees and biodiversity

9.19 The Woodland Trust supports planting of native species because they benefit local ecosystems, help insects and other animals to survive and provide a food source for wildlife. Native trees require little maintenance if they are planted in favourable conditions and subsequently require far less water. Planting a variety of tree species can support more diverse wildlife.

Ancient Woodland

9.20 Ancient woodland includes any area that has been wooded continuously since at least 1600 AD and is designated as irreplaceable habitat that is important for its wildlife, complex soils, and recreational, cultural, historical and landscape value. There are over 8 square kilometres of ancient woodland in Mid Devon and the ancient woodland inventory in the district is currently being reviewed by the Devon Wildlife Trust.

Planning and tree planting

9.21 The planning process can have an important role in securing the planting of new trees in planned new developments and in proposals where planning permission is required. This could include free standing specimens or where trees are planted as part of hedges, and can be as part of landscaping schemes and green infrastructure, and along streets, footpaths and cycleways. Plan Mid Devon could be supported by supplementary planning guidance about how tree planting may best be achieved, including preferred species, siting and arrangements for care, maintenance and replacement. The planning process can also have an important role in preventing the loss of trees and hedgerows, including on development sites, or where these may be protected by a preservation order or are in a conservation area.



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Question 30

In addition to securing tree planting along new streets and walking / cycle paths and as part of green infrastructure, should Plan Mid Devon include a prescribed level of tree planting in new development?

(Yes / No - if yes please tell us what level you think this should be and why)

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Phosphates and the environment

9.22 Natural England has recently notified Councils that phosphate levels within the Somerset Levels catchment have rendered the protected Somerset Levels and Moors Ramsar Site to be in an unsatisfactory condition. While the Levels and Moors are situated outside Mid Devon, part of the district (part parishes of Clayhanger, Hockworthy, Holcombe Rogus and Culmstock, and subject to clarification also Hemyock and Burlescombe) fall within an indicative catchment identified by Natural England.



9.23 In light of a court judgement (known as Dutch Nitrogen) before determining a planning application competent authorities should undertake a Habitat Regulations Assessment (HRA). The types of development (which include agricultural development where there is agricultural water discharge) include:



- New residential units – including tourist accommodation, gypsy sites / pitches
- Commercial developments – where overnight accommodation is provided
- Agricultural development – additional barns, slurry stores, etc. where it is likely to lead to an increase in herd size
- Prior Notifications of agricultural development where, as a result of the development, the herd size may increase. Also, prior notifications for change of use of office to dwellings and agricultural buildings to dwellings
- Anaerobic digesters
- Potentially some tourism attractions

9.24 While the Council will need to liaise with Natural England and Somerset Local Planning Authorities about the process for calculating the new phosphate loading from development and approaches to mitigation, the notification from Natural England will have implications for the new Local Plan, where accommodation may be proposed in the indicative catchment area. Any proposed development which includes overnight accommodation will need to be assessed for 'nutrient neutrality'.

Green and Blue Infrastructure

9.25 National Planning Policy makes clear that plans should take a strategic approach to maintaining and enhancing networks of green and blue infrastructure. This can include multi-functional green and blue spaces with recreational, visual and ecological value, which can bring a range of other environmental, social, economic and health and well-being benefits, including serving as 'sustainable drainage systems' ('SuDs'), cooling areas in hot weather, acting as a buffer against noise pollution, and in achieving well designed places. Green infrastructure can include natural and semi-natural green spaces, for example grassland, nature reserves and green corridors comprising hedgerows and verges. Public or private spaces like gardens, parks, village greens and allotments are also green infrastructure. Blue infrastructure can include watercourses, lakes, ponds, reed bed filtration systems and other bodies of water.

9.26 Given that Mid Devon is predominantly rural there is already a vast network of green and blue infrastructure assets – including 476 miles of Public Rights of Way and cycle routes linking hedgerows, nature reserves, open water bodies and rivers, grassland, woodland and wetlands. Current Local Plan policies protect green and blue infrastructure and require major new developments to incorporate green space, establish green corridors and avoid habitat fragmentation. In addition to protection, the new Local Plan could also provide opportunities for rewilding, where areas in new development are left for nature to take its course, returning to a natural state and creating more biodiverse habitats. Introduced within the Government's 25 Year Environment Plan (2018), Nature Recovery Networks (NRN) offer chances to reverse habitat fragmentation and create wildlife corridors which connect across county borders. NRNs are founded on Local Nature Recovery Strategies, which the Environment Act requires all public authorities to take into regard. As well as tackling biodiversity decline,



NRNs are intended to address the challenges of climate change through nature-based solutions, and well-being by increasing public access to nature.

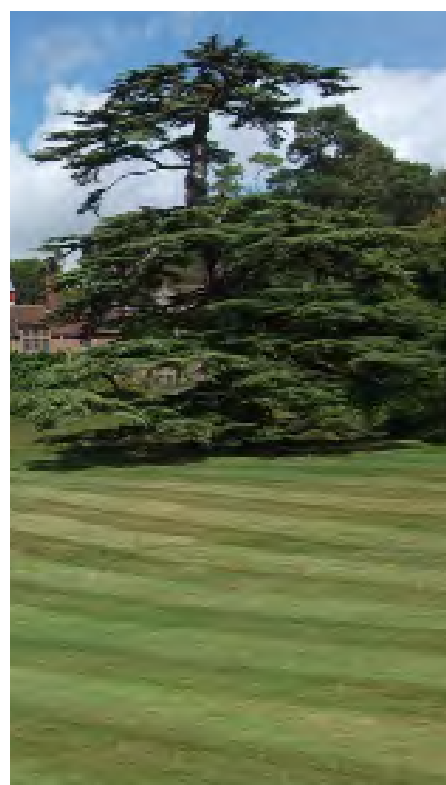
9.27 A new Green and Blue Infrastructure Strategy can be prepared to help inform Plan Mid Devon, which can include a review of the green and blue infrastructure across the district and identify opportunities for enhancing and creating networks. This can be used to guide site allocations in the new Local Plan, site masterplan and planning applications submitted to the Council for determination.

Heritage Assets

9.28 Mid Devon has many heritage assets, including over 2,600 listed buildings and scheduled monuments, 51 conservation areas, and 3 registered parks. These assets are invaluable and irreplaceable, and give our landscapes, towns and villages their character, identity and sense of place. Unfortunately, there are currently 22 heritage assets in the district that are registered as being at risk.

9.29 Mid Devon's heritage assets include the Knightshayes historic park and garden, and Grand Western Canal – both are of particular significance to the future strategic planning of the district given their scale, location and wider setting.

9.30 Knightshayes is a Grade II* listed historical park and garden that is situated to the north of Tiverton. Within its borders are Knightshayes, a Grade 1 listed building, and several Grade II listed ancillary buildings. The property was initially built to overlook Tiverton (and the valley) because, in aesthetic terms, the town was seen as complementary to the estate. A historic landscape assessment undertaken for the National Trust (2007) identifies a substantial setting for Knightshayes park, which includes the whole of Tiverton and also open countryside to the west, south and east of the town.



9.31 The Grand Western Canal is a designated Conservation Area and also a designated County Wildlife Site. Originally it ran between Taunton in Somerset and Tiverton. Today, about 11 miles remain and this is important because of its countryside location and engineering features (built without locks, but with elevated sections and embankments, and cuttings).

9.32 The National Planning Policy Framework (NPPF) states that proposals affecting heritage assets and their settings should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In addition, heritage assets should be conserved in a manner appropriate to their significance. The current Local Plan includes policies for protecting the historic environment, requiring development proposals to consider the significance of assets, in order to protect them from harmful effects.

9.33 The conservation and enhancement of heritage assets and their settings is important as it adds significant value to the character of towns and villages as well as landscape. In return it encourages cultural activities, economic development, tourism and social life. Well cared for historic environment also encourages a sense of belonging and identity.

9.34 There is a need to make sure that where development is planned this does not harm our heritage assets. Conservation areas protect the special architectural and historic interest of a place. Only one third of Conservation Areas in Mid Devon have been subject to a Conservation Area Appraisal (CAA) and even fewer have Management Plans (CAMP).

Conservation Area Appraisals (CAAs)

9.35 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Council to determine which areas of special architectural or historical interest should be designated as conservation areas, and from time to time to review those conservation areas. There is no prescribed timescale for a review and while every 5 years is ideal, this will vary according to the development pressures in the local area. The Cullompton Conservation Area is currently being re-appraised as part of the preparation of a Management Plan, as it is on the national at risk register (together with the conservation area at Bow). The Council has identified a need to undertake further Conservation Area Appraisals in the district, to help avoid damage to heritage assets and their settings.

51 Conservation Areas in Mid Devon

Ashill	Chevithorne	Hockworthy	Sandford
Bampton	Coldridge	Holcombe Rogus	Silverton
Bickleigh	Colebrooke	Huntsham	Stockleigh English
Bickleigh Castle	Coleford	Kennerleigh	Stockleigh Pomeroy
Blundell's	Cove	Kentisbeare	Stoodleigh
Bolham	Cove Hill	Knowle	Thorverton
Bow	Craddock	Lapford	Tiverton
Bradninch	Crediton	Morchard Bishop	Uffculme
Cadeleigh	Cullompton	Newton St Cyres	Upton Hellions
Chawleigh	Culmstock	Oakford	Willand
Cheriton Bishop	Down St Mary	Oakfordbridge	Yeoford
Cheriton Fitzpaine	Grand Western Canal	Puddington	Zeal Monachorum
Chettiscombe	Halberton	Sampford Peverell	

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Grand Western Canal

9.36 Parts of the Grand Western Canal are under pressure through planned new development. The Eastern Urban Extension and other sites in Tiverton, as well as developments in Halberton and Sampford Peverell are in close proximity to the Canal's conservation area. A need has been identified to review the Grand Western Canal Conservation Area and this can provide an opportunity to undertake a canal sensitivity study. This could include consideration of a number of different objectives, including the planning of new development and mitigating its impacts on the character and setting of the Conservation Area. An up to date appraisal of the Conservation Area could help guide the future planning of development in the proximity of the canal, and be material in helping guide planning applications submitted to the Council for determination and decisions made on these.

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Question 31

Are there any specific parts of the Grand Western Canal that should be given more protection and why?



IMPROVING OUR HEALTH AND WELL-BEING

10.1 Supporting healthy communities forms part of one the three overarching objectives for achieving sustainable development. National planning policy makes clear planning policy and decisions should aim to achieve healthy places which enable and support healthy lifestyles. The environment around us is one the key determinants affecting our health – physically and mentally.

10.2 The current Local Plan promotes healthy communities in a number of ways. While it facilitates the provision of well-designed and more affordable housing, and the creation of jobs, healthy places are supported through the delivery of:

- social, educational, recreational and cultural facilities and services
- access to high quality open space, public rights of way, recreational trails, accessible land, allotments and other green infrastructure, and
- opportunities for sport and recreation and the designation of Local Green Space.



10.3 Plan Mid Devon provides an opportunity to take these measures forward where new development is planned to continue to support our health and well-being. Additionally, Health Impact Assessments can be required when planning applications are submitted to the Council for determination.

10.4 A Joint Strategic Needs Assessment has been undertaken for Devon and was published in June 2021. This looks at the current and future health care needs of local populations to inform and guide the planning and commissioning of health, well-being and social care services within a local authority area. A key issue affecting Mid Devon is its ageing population and age-related health conditions, but there are also health issues related to younger age groups that will affect their health outcomes. The population profile of Mid-Devon has a significant and growing aged population, with the 65-84 age group growing by 23% from 2021 to 2040, and the 85+ age group nearly doubling over that period.

Health and planning

10.5 While younger age groups are proportionately smaller compared to the rest of England, health inequalities are still significant across these age groups. Hospital admissions for children and young people in Devon are considerably higher for mental health conditions, self-harm and injuries, and the gap is even wider for disadvantaged and looked after children. Furthermore, 11.8% of children in Mid Devon live in poverty. This has an impact on development of their skills for the workforce and consequences such as earning lower wages as adults.

10.6 Life expectancy has remained fairly stable over the last decade, with people living their remaining 10 to 15 years of life in poorer health, with leading behavioural risk factors being diet, lack of physical activity, alcohol intake and smoking. The Joint Strategic Needs Assessment identified for Mid Devon that 21.7% of the population is physically inactive and 31.1% are obese and 23.6% regularly using alcohol and 12.1% regularly smoking. Poor physical and mental health can impact on income and the ability to work, and increase demands for health and social care services. This in turn presents challenges around access to services in Mid Devon's rural areas.

10.7 Dementia diagnosis remains unchanged in Devon, and there is a potential gap of unmet need with an estimated 2 in 5 people aged 65 and over having undiagnosed dementia. In the UK there are about 850,000 people living with dementia, and this figure is projected to increase to 1.6 million people by 2040. Currently, it is estimated that 5.6% of the population are living with dementia in Mid Devon and the growth in this age group in Mid Devon presents clear challenges. The Royal Town Planning Institute has prepared advice about dementia and planning. People living with dementia may experience the built environment differently to other people. Good quality housing and well-planned places can have substantial impact on the quality of life for someone living with dementia – and can also help older people, people with disabilities and others in the community.

10.8 Climate change will bring more extreme weather events including flooding, heatwaves and impacts on air quality, which can affect health, well-being and safety, particularly for vulnerable and older people. Plan Mid Devon will seek to address these challenges.



COVID-19 pandemic

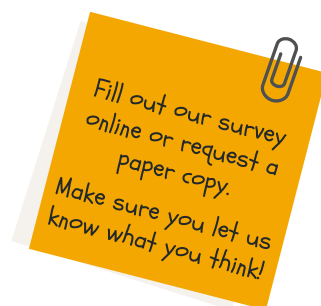
10.9 The COVID-19 pandemic and local / national lockdowns have placed restrictions on travel and meeting people and this had a disproportionate impact on older persons, and also persons with physical and learning disabilities. It has also brought into sharp focus the strengths and weaknesses of our places and our way of life.

10.10 The pandemic has highlighted health inequalities in terms of differences in people's health and well-being that result from the conditions in which they are born, grow, live, work and age. These conditions are wider determinants of health and include education, work environment, living and working conditions, income, access to health services, housing, and affordable food and fuel. For example, the pandemic has impacted social and community networks, showing that lack of social contact has a detrimental impact on mental health (causing or facilitating anxiety and depression). It has also had a negative impact on individual lifestyle factors such as lack of exercise and unhealthy diet, causing other health issues. There are actions in relation to land use planning that can be taken to reduce these (avoidable illnesses), including:

- Creating fair employment and good work for all
- Ensuring a healthy standard of living for all
- Create and develop healthy and sustainable places and communities

10.11 The Royal Town Planning Institute (RTPI) has launched its 'Plan the World We Need Campaign as part of a call to capitalise on the expertise of planners to achieve a sustainable, greener, resilient and inclusive recovery from the COVID-19 pandemic. Plan Mid Devon can take this forward locally, through the measures set out above and this can build resilience, and help tackle inequality and address climate change too. The preparation of Plan Mid Devon will provide an opportunity for a Health Impact Assessment (HIA) screening to help understand the effects of its policies and proposals on public health and well-being, and address these as the plan is finalised, and for the inclusion of a policy or requirement for certain development proposals to be subject to a Health Impact Assessment as part planning applications submitted for determination.





Question 32

Please select what you think should be the top three measures in terms of their importance in the planning our places to encourage and support healthy lifestyles

- **Healthcare infrastructure and facilities (where there is a need to support the new development)**
- **Buildings and spaces for community use to support social interaction and mental well-being**
- **Opportunities and access to open space and play and recreation**
- **Opportunities for active travel, including walking and cycle routes**
- **Opportunities for growing food locally, e.g. through allotments or the planting of fruit trees as part of landscaping schemes**
- **Good design and place making**
- **Decent homes and amenity space around them**
- **Improving habitats and biodiversity**
- **Other (please state what you think this should be)**

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Planning for new Healthcare facilities

10.12 The current Local Plan has included provision for a new doctor's surgery at Sampford Peverell, and more broad support for healthcare facilities as part of the planned growth at Tiverton and Cullompton. The preparation of a new Local Plan provides an opportunity to review and plan for new and improved healthcare facilities in Mid Devon, and include policies to help protect those facilities that already exist. There is further information about this section 8 'Infrastructure and how we travel'.



HOW OUR PLACES LOOK AND ARE USED

11.1 The Government introduced a new National Planning Policy Framework (NPPF) in July 2021. This places a stronger focus on the creation on beautiful buildings and places. The new NPPF:

- makes beauty and place-making a strategic theme in the Framework
- sets out the expectation that local authorities produce their own design codes and guides setting out design principles which new development in their areas should reflect
- sets an expectation that all new streets are tree-lined
- improves biodiversity and access to nature through design
- puts an emphasis on approving good design as well as refusing poor quality schemes.



11.2 Alongside the NPPF the Government has also published the National Model Design Code to form part the national planning practice guidance. This provides detailed guidance on the production of local design codes, guides and policies to promote successful design, and it expands on ten characteristics of good design set out in the National Design Guide. The National Model Design Code sets a baseline standard of quality and practice which the Council will be expected to take into account, including the approach to landscape, green infrastructure, biodiversity and tree-lined streets, as well as addressing the orientation of buildings to ensure adequate internal levels of daylight, prevent overheating, and protect the public realm from wind funnels.

11.3 The current Local Plan includes policy DM1 on High Quality Design and the Council has recently adopted a new Mid Devon Design Guide. This is firmly rooted in an assessment of the design characteristic of buildings and places in Mid Devon and contains guidance on how development can be carried out in accordance with good design practice.

11.4 The preparation of a new Local Plan now provides an opportunity for us to set a high bar for beauty and design quality. It can help us ensure that new homes are built to a much higher standard, and that developments are visually attractive, function well and add to the overall quality of the area. Development that is not well-designed can be refused, especially where it fails to reflect design policies, the Mid Devon Design Guide and Government guidance on design.

11.5 Mid Devon District Council is one of 14 councils in England chosen to take part in a fully-funded pilot programme to test the Government's new National Model Design Code (NMDC). It is a six-month testing programme to see how the design code could be applied in the area. The document provides guidance to Local Planning Authorities on how to produce the design codes, sets out methods to capture and reflect the views of the local community from the outset and provides a resource of good urban design principles that can be used to inform planning decisions.

11.6 Strategic allocations will need a comprehensive approach to delivering high quality development with coordinated infrastructure provisions. A key element of this is through masterplanning and parcel plans. Plan Mid Devon will have an opportunity to set out expectations for masterplanning, phasing and partnership working.

Question 33

National Planning policy and guidance does not define what is meant by 'beauty' in design. What aspects of design, such as layout, architecture or landscape elements, do you think would contribute to create beautiful places and buildings?



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OUR TOWNS AND THEIR ENVIRONS

12.1 Most planning activity takes place around the district's three main towns at Tiverton, Cullompton and Crediton and their immediate environs. This is since they have the largest communities and are where the greatest need exists for new homes, jobs, services and other facilities to be provided. Additionally, for sustainability reasons, they are where the substantial proportion of new development is planned through Local Plans, including through redevelopment and extensions to the urban extensions and provision of new transport and other infrastructure.

Town centre vitality and viability

12.2 Mid Devon's three main towns – Tiverton, Cullompton and Crediton each have key roles in providing a range of shops, employment and services for their communities and their environs. However, their town centres face a challenging future due to changing national retailer requirements, online shopping and reduced consumer spending. This has become more pronounced due to the COVID-19 pandemic and with greater reliance on shopping over the internet and home deliveries.



12.3 It is recognised that the town centre is at the heart of a market town's community. For this reason the adopted Local Plan identifies 'primary shopping areas' in the three main town centres, where the shopping function will be safeguarded and enhanced. Within these 'primary shopping areas' are areas of 'primary shopping frontage' where retail development is concentrated, including a high proportion of uses such as food, drinks, clothing and household goods. The Local Plan has a requirement that at ground floor level the proportion of A1 (retail), A2 (financial and professional) and A3 (café and restaurant) will not be permitted to fall below 85% of all units. Generally, planning permission would not be needed when the existing and the proposed use fall within these three use classes.

12.4 In September 2020 the Government simplified the use classes order to help achieve its policy objective to rejuvenate and safeguard the vitality and viability of town centres. This included replacing use Classes A1, A2, A3 and Class B1 (Business) into a new 'Class E' (Commercial, Business and Service), which has enabled a wider range of use changes within this new class. The Government has subsequently brought into force from 1st April 2021, and which took effect from 1st August 2021 a permitted development right for change of use from Class E to residential use, which is intended to help bring forward new homes through the conversion of existing buildings. This only applies to properties under 1,500 square metres of floorspace, and to properties that have been in Class E use for 2 years and have been vacant for 3 months ahead of a prior approval application date to the Council. Prior approval is where confirmation is sought from the Council that specified parts of a development are acceptable, before work can commence, and this allows the Council to consider the proposals and their likely impacts in regard to certain factors (e.g. noise, odour, waste handling, opening hours, air quality, design and appearance, transport impact, risk from flooding) and how these may be mitigated. While the change has the potential to enable more people to live in the three main town centres in Mid Devon, increase footfall and help support the evening economy, it also has potential to result in the loss of shops and other commercial uses, breaking up areas of primary shopping frontage and eroding the character and appearance of their primary shopping areas. However, it is not known what the scale of impact might be and whether the benefit of more residential use in town centres might outweigh any losses of commercial uses and would not fundamentally harm the vitality and viability of the town centres. For example, a small number of retail to residential conversions may have little impact on the total available retail floorspace, and not be sufficient to justify intervention by the Council.

12.5 There is an opportunity for the Council to introduce 'Article 4 Directions' at Tiverton, Cullompton and Crediton town centres to restrict Class E to residential permitted development rights. However, the potential harm that the direction is intended to address will need to be clearly identified and the move for a direction would be scrutinised by the Government. The Government has set out measures which will be included in a revised National Planning Policy Framework to ensure that Article 4 directions are used in a targeted way to protect the thriving core of historic high street areas. The use of Article 4 directions to remove national permitted development rights should: where they relate to change from non-residential use to residential use, be limited to situations where an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre); in other cases, be limited to situations where an Article 4 direction is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities); in all cases, be based on robust evidence, and apply to the smallest geographical area possible.



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12.6 It is evident in a national context that shopping habits are changing and more people are choosing to shop online and have home deliveries. The current pandemic has helped to accentuate this trend. The preparation of a new Local Plan provides an opportunity to look at the role of town centres in Mid Devon afresh and reconsider the role of their core areas, with potential for a greater emphasis placed on supporting a visitor experience through leisure, entertainment and cultural activities, cafes, restaurants and bars, which can maintain and improve footfall and the time people spend in a high quality historic environment.

12.7 The new Local Plan will provide an opportunity to review the policy approach to our three main town centres. This could include:

- continuing to identify 'primary shopping areas' and the 'primary shopping frontages', with a percentage threshold for town centre uses, and with potential for using 'Article 4 directions to remove national permitted development rights to change to residential use, or,
- No longer defining 'primary shopping frontages' and allowing a wider variety of uses in the town centres to support their wider leisure, cultural and entertainment roles.

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Question 34

How should we prioritise the planning of Tiverton, Cullompton and Crediton town centres? Please go through questions 34A to D, and provide your reasons why.

- Maintain a high proportion of shops and other commercial uses and services?**
- Support a wider visitor experience by giving flexibility for a variety of other uses, including leisure, cultural and entertainment facilities?**
- Allow the conversion of more commercial properties to residential use?**
- Other, please tell us what**

12.8 The Council will continue to engage with Tiverton, Cullompton and Crediton Town Councils about the future of their town centres and will also encourage and look for opportunities for public and private partnerships to attract new investment.



Sustainable neighbourhoods

12.9 Mid Devon has many types of neighbourhoods, ranging from towns, villages and rural hamlets. Tiverton, Cullompton and Crediton make up our three main towns while there are 22 designated villages and multiple rural communities spread across the District. Mid Devon has a very low population density of 0.9 people per hectare²⁴ and of the challenges Mid Devon faces is ensuring that we have sustainable neighbourhoods, with everyday needs within easy reach for our communities for the wide range of neighbourhoods in our district. In planning for our communities, as well as embracing the special qualities of the different areas in our District there is a familiar concept that could help benefit all local areas, that is the 20-minute neighbourhood. 20 minute neighbourhoods can be supported through the planning of new facilities and also retaining those facilities which are already present but which could be at risk of closure.

12.10 The idea of the '20-minute neighbourhood' has been around for many years, but has more recently grown interest around the world, particularly since the COVID-19 pandemic has emphasised the importance of liveability of where you live. With people spending more time locally, working from home more frequently, using public green space, cycling and walking instead of using cars and connecting with neighbours. The basic idea is that people should be able to access their daily needs within a short distance from their homes. 20-minute neighbourhoods have multiple benefits, greater social and economic inclusion, including boosting our local economies, improving people's health and well-being, increasing social connections in communities and tackling climate change.

12.11 The concept is most commonly applied in urban areas however it is a useful tool for rural areas also. For our towns and larger villages it means creating complete, compact and connected neighbourhoods where people can meet their everyday needs within a short walk or cycle. For smaller villages it is making it easy for people so that they only need to get to one place for most of their needs. For more rural areas it's enabling those connections, making everyday resources within easy reach, by linking groups of villages and exploring opportunities for good walking and cycling networks.

12.12 Every community will have its own context and aspirations for the future. Any plans to create a 20-minute neighbourhood should be based on what the local community wants, however the following characteristics are likely to be part of the mix.



TCPA 20-Minute Neighbourhoods (2021)



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12.13 This shouldn't mean discrete zones for living and working but rather a mosaic of neighbourhoods which interlink. Here at Mid Devon we are already embracing the idea of the 20-minute neighbourhood with a goal of making our District a great and inclusive place to live. The principles of a 20-minute neighbourhood largely formed part of the announcement from Government in 2017 for plans for a number of new Garden Villages and Towns across the County, including the proposed Culm Garden Village in Mid Devon. We have also started our own local research on what people think of their neighbourhood in new build homes. A resident's survey of recently completed new homes was undertaken in early 2021. The survey findings indicate that overall residents have a moderate level of satisfaction of their neighbourhood with residents most happy with their schools, safety, character and appearance and noise levels. However, what we can improve on are pedestrian and cycle routes both in quality and quantity to important services and facilities²⁵.

12.14 A number of partners nationally, including the Town and Country Planning Association, Sport England, Sustrans, the Design Council and Fields in Trust are working together to support the goal of achieving 20-minute neighbourhoods. To achieve 20-minute neighbourhoods in Mid Devon we will need the support of our communities and we will work together with a number of partners including Devon County Council who are our education and highways authority, the NHS, Healthcare Trusts, local businesses and many other key partners.

12.15 To help us achieve this goal we would like you to help us identify what is important to you in your neighbourhood and what we can improve.

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Question 35

Which town (or village or rural area) do you live in?

Question 36

What do you like most about where you live?

Question 37

How do you think we could achieve a 20 minute neighbourhood where you live to make it more sustainable?



Neighbourhood Planning

12.16 The Localism Act 2011 introduced a new approach to planning which has aimed to give people more say about what goes on in their local area. Town and parish councils in Mid Devon are able to prepare Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders. Neighbourhood Planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Local communities can choose to set planning policies through a neighbourhood plan and/or grant permission through development orders. At the time of writing Mid Devon currently has one made Neighbourhood Plan and three Designated Neighbourhood Plan Areas. Once a Neighbourhood Plan has been examined and has passed its referendum it forms part of the statutory development plan for the area it covers, alongside the Mid Devon Local Plan and the Devon Waste and Minerals Plans, and carries full weight for guiding planning applications submitted to the Council for determination and the decisions made on these.

12.17 Where Town and Parish Councils are preparing neighbourhood plans the Council will work positively to help ensure that these are in general conformity with the strategic policies of the current Local Plan for Mid Devon. While a draft neighbourhood plan is not tested against the policies in an emerging Local Plan it should have regard to up to date evidence, such as local housing need, that will inform the local plan process. The Council will ensure that Town and Parish councils are fully engaged throughout the preparation of Plan Mid Devon and will discuss and aim to agree the relationship between policies in an emerging neighbourhood plan and those in the emerging local plan with regard to national planning policy and guidance.

Issues and opportunities to plan for

Tiverton and its environs

12.18 Tiverton is a medium sized market town serving a rural hinterland in the central part of Mid Devon and to the north. The strategy of the current Local Plan is to maintain its status as largest urban area in Mid Devon and increase the self-sufficiency of the town and its area by improving access to housing, employment and services for its population and that of the surrounding rural areas.

12.19 While the majority of current planned growth at Tiverton (1580 dwellings and 30,000 sq m of commercial floorspace) is through an eastern extension to the town, the long-term options for further growth are constrained by the town's topography, flood plains and the position of the A361. Cumulative traffic impacts on Junction 27 of the M5 must also be considered. Improvements to signalisation of the junction will have provided capacity for planned strategic development in Tiverton. However, additional development may require further improvements to the junction. Traffic assessments will be required where appropriate to consider impacts on the local and strategic road network.



12.20 The current local plan allocates land for development on a number of smaller sites at the town, including Farleigh Meadows (255 dwellings), Town Hall (59 dwellings), Moorhayes Park (8 dwellings), Howden Court (10 dwellings), Roundhill (20 dwellings), Palmerston Park (25 dwellings), Phoenix Lane (60 dwellings), and Blundell's School (200 dwellings). Land at Tidcombe Hall is identified as a contingency site (100 dwellings).

12.21 Other constraints to future expansion of Tiverton include the need to protect the Tidcombe Fen Site of Special Scientific Interest (SSSI), and the setting of the Grand Western Canal Conservation Area and Knightshayes Court Grade 1 Listed Building.

12.22 The Council is preparing a masterplan for Tiverton Town Centre. This is a key regeneration project that aims to enhance the economic prospects of the town and provide a clear strategy to make sure Tiverton builds on its existing qualities and assets to meet its full potential as a thriving market town. The masterplan will be a Supplementary Planning Document and a material consideration for decisions made on planning applications submitted to the Council for determination.

12.23 Tiverton Town Council is currently preparing a Neighbourhood Plan (NP) for its parish. The Neighbourhood Plan is in Pre-Submission (Regulation 14) stage. This includes policies on type, scale, design and character of new development. The policies also include provision for local green spaces, delivering biodiversity net gain, and protecting built heritage. The Neighbourhood Plan raises the issue of a sustainable and carbon neutral community, shortage of affordable homes, temporary accommodation and lack of pedestrian and cycle connectivity within and outside of the town. The Plan points out the need to revitalise Tiverton's historic town centre and the risk of losing footfall due to out-of-town retail, shopping centres and the internet, the need for lower cost rental housing, and the lack of starter units and office space.

12.24 The preparation of this Issues Paper has helped to identify some key local facilities and a range of issues affecting the Tiverton area, which we have listed below. We will take these into consideration and investigate further to help us prepare Plan Mid Devon. The following questions provide an opportunity for you to tell us more about these or other issues which you think are important to the future planning of Tiverton and its environs.

- A396 – heavy traffic and the narrow and historic Bickleigh Bridge
- Potential for a cycle route in the Exe Valley
- Provision of healthcare facilities locally, including the Tiverton and District Hospital
- Tiverton Museum of Mid Devon Life
- Opportunities to regenerate the Pannier Market and land at Phoenix Lane
- Visitor potential – enhanced provision of accommodation with the recently completed Premier Inn





Question 38

What do you think are the top 5 main issues affecting Tiverton and its environs that need to be addressed in a new Local Plan? Please rank these in order of importance (1 = most important, 5 = least important)

Question 39

What do you think are the opportunities for us to consider in the future planning of Tiverton and its environs, including locations that may be suitable for development?

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Cullompton and its environs

12.25 The current Local Plan includes proposals for Cullompton to become the strategic focus of new development in Mid Devon. This reflects the town's accessibility, economic potential and environmental capacity. This strategy will improve access to housing through urban extensions and expanded employment opportunities. There will be significant improvements to the town's infrastructure and connectivity, including the reopening of the railway station, and improved services for its population and nearby rural areas.

12.26 The Council is currently preparing a masterplan for Cullompton Town Centre. Once adopted this will form the basis for the regeneration of the town; enhancing the town's economic prospects and providing a clear strategy to ensure the town meets its full potential as an attractive, thriving and sustainable town post COVID-19 and into the future. This is alongside work to help regenerate Cullompton Town Centre through the High Streets Heritage Action Zone (HAZ) programme.

12.27 Cullompton Town Council has become the first in Mid Devon to have an approved Neighbourhood Plan, passing its referendum held on 6th May 2021. The Neighbourhood Plan now forms part of the statutory development plan for Cullompton parish, alongside the Mid Devon Local Plan and the Devon Waste and Minerals Plans, and carries full weight for guiding planning applications submitted to the Council for determination and the decisions made on these. It has policies on traffic and the public transport network, cycling and walking paths, flood attenuation, housing and gypsy and traveller sites. The policies also call for protection of the natural and historic environment, recreational facilities, economy and green space amongst others. The Plan points out flooding issues, lack of public rights of way, traffic congestion due to the proximity to the M5 and shortages of sports pitches.



12.28 The preparation of this Issues Paper has helped to identify some key local facilities and a range of issues affecting the Cullompton area, which we have listed below. We will take these into consideration and investigate further to help us prepare Plan Mid Devon. The following questions provide an opportunity for you to tell us more about these or other issues which you think are important to the future planning of Cullompton and its environs.

- The volume of traffic on the A373 to Honiton and the need for improvements to this road
- Traffic through the town centre when the M5 is closed and the unsuitable nature of the B3181 and A396 for diverted traffic
- Junction 28 – impact of M5 closures
- Monthly farmers market
- Disconnectivity between the western and eastern parts of Cullompton due to the town being bisected by the M5
- Lack of hotels, yet there are local visitor attractions, including the Blackdown Hills AONB and the Cullompton Leat
- There is need for connectivity between Cullompton and the proposed Culm Garden Village
- More cycling routes are needed
- Utilise available brownfield site opportunities
- Need for town centre improvements and parking
- Need for air quality improvements in the town centre
- Lack of space in the town centre for waste and recycling storage
- Opportunity for designing in underground waste collection facilities at the proposed Culm Garden Village to provide increased capacity and efficiency
- Opportunity for a new railway station





Question 40

What do you think are the top 5 main issues affecting Cullompton and its environs that need to be addressed in a new Local Plan? Please rank these in order of importance (1 = most important, 5 = least important)

Question 41

What do you think are the opportunities for us to consider in the future planning of Cullompton and its environs, including locations that may be suitable for development?

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Crediton and its environs

12.29 The current Local Plan includes proposals for Crediton to continue to develop in its role as a small and vibrant market town, serving a rural hinterland in the western part of the district. This strategy aims to improve access to housing within the town, expand employment opportunities and improve the quantity and quality of the existing retail provision.

12.30 The established settlement limit for Crediton is now at the extent of the parish boundary, with the exception of land to the south of the town. The future planning of Crediton will therefore need to include consideration of neighbouring parishes (Crediton Hamlets, Sandford, and Shoebrook, and also Newton St Cyres). This is since the town provides a range of local shops and services supporting this hinterland, and the town and its environs are connected by the A377 road (from Exeter to Barnstaple) and have strong ties of economic activity (including food production and food processing). The new Local Plan will provide an opportunity to look at the future planning of the Crediton area afresh, including the capacity of existing roads, opportunities for cycling and walking, improved rail services, and at a more strategic level investigating the feasibility of linking the A377 with the A30.

12.31 The Council has committed to prepare a masterplan for Crediton Town Centre. Once adopted, this will have Supplementary Planning Document status, with the aim to provide a clear strategy to ensure that Crediton town centre meets its full potential as an attractive, thriving vibrant place with a strong economic function, now and into the future.



12.32 Crediton Town Council is currently preparing a Neighbourhood Plan for its parish. The Neighbourhood Plan is in Pre-Submission (Regulation 14) stage. This includes policies on sustainable development, natural and historic environment, design, housing and site allocations. The policies also call for community facilities, town centre and economic development, and implementation of renewable energy. The Plan also points out issues such as poor mobile phone signal, lack of train station, removal of existing trees by development and losing open green fields and hedgerows to development.

12.33 The preparation of this Issues Paper has helped to identify some key local facilities and a range of issues affecting the Crediton area, which we have listed below. We will take these into consideration and investigate further to help us prepare Plan Mid Devon. The following questions provide an opportunity for you to tell us more about these or other issues which you think are important to the future planning of Crediton and its environs.

- Crediton town is developed to the limits of parish boundary
- There is a need for a cyclepath at Sandford
- Existing railway station
- Crediton has a strong local food scene
- Farmers market / dairy / products sold all over the country
- Milling / printing
- Crediton Hospital
- NHS hub
- Tourism and St Boniface Patron Saint of Devon – Church
- Need parking for touring coaches
- Poor air quality in the town centre
- Need sites for new businesses and to expand
- Queen Elizabeth School
- Rivers Creedy and Yeo – poor water quality in river Yeo





Question 42

What do you think are the top 5 main issues affecting Crediton and its environs that need to be addressed in a new Local Plan? Please rank these in order of importance (1 = most important, 5 = least important)

Question 43

What do you think are the opportunities for us to consider in the future planning of Crediton and its environs, including locations that may be suitable for development?

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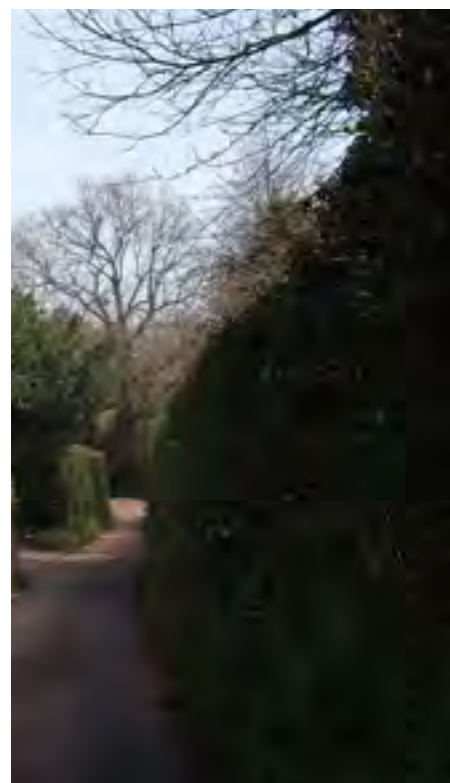


OUR RURAL AREAS AND VILLAGES

Rural vitality

13.1 Mid Devon has a network of villages and hamlets. Their provision of local shops, services and community facilities plays a vital role in maintaining rural prosperity and contributes to the overall sustainability of the district. Larger villages can often be complete, compact and connected neighbourhoods, whereas smaller villages and more rural areas rely on their access to larger settlements for their services and facilities or work in connection with each other as a cluster. However, changing shopping and cultural habits and lack of opportunities for the growth of village communities can impact on the vitality and viability of villages.

13.2 The current Local Plan includes a policy to help prevent the loss of community facilities such as the local shops, public houses, allotments, cultural and recreational facilities and other important local services, where this would damage a settlement's ability to meet its day to day needs or result in the total loss of such services to the community. Only in circumstances where the facility is proven to be no longer economically viable, including for alternative community uses, will applications for alternative use be considered acceptable. Assessment of viability will require the submission of detailed evidence relating to trading accounts, valuation considerations and the marketing of the business or property at a reasonable price for a minimum of 12 months.





13.3 Local communities can nominate buildings as ‘assets of community value’ to be added to a register held by the Council. Once on the register the owners of a facility will need to notify the Council if they intend to sell the asset, at which point the community will be offered the opportunity to purchase it. Mid Devon District Council will compile this list as community assets are brought forward. Applicants should contact the Council for further advice should they wish to apply for planning permission or change of use on a community facility that has been included on the register. The Council cannot refuse planning permission purely on the basis that a community asset is on the register.

13.4 The new Local Plan provides an opportunity to continue to have a policy to prevent the loss community facilities at villages. It can also identify land within or adjoining villages that would be suitable for new community facilities to be provided. The provision of this community facility could be achieved as part of mixed use development, such as housing, in that location and its viability sustained through a growth in local population.

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Question 44

Which community facilities in village(s) in Mid Devon do you think are currently at risk of being lost through closure or other development? Please tell us the name of the village and the community facility currently at risk.

Rural Accessibility

13.5 While some villages benefit from a connection to the railway network (Yeoford, Copplestone, Lapford), others are reliant on local bus services for public transport. For most people residing outside the three main towns reliance on the car is, and will continue to be, the main means of travel. The 2011 Census has shown that nationally, 48.9% of rural households had 2 or more cars or vans compared with 28.5% of urban households. In general, people living in rural areas will have lower levels of accessibility and journey times are likely to be longer to places of employment, schools, shops, healthcare and other facilities. In the future planning of rural Mid Devon there will be a need to look at ways to improve accessibility where possible and help those who may be disadvantaged through living away from the main service centres.





Small scale housing potential at villages to help sustainability

13.6 The sustainability of rural areas can be supported through the planning process through identifying opportunities for villages to grow and thrive. This can include providing for some small scale housing, which can help meet local housing need and can also support local shops and services, and could help bring about other improvements such as the introduction of public charging points for electric cars and investment in footpaths and cycle routes. Plan Mid Devon can seek to allocate sites within or adjoining those places which may already have some local facilities. There may also be an opportunity where there is a group of smaller settlements in Mid Devon for the new Local Plan to facilitate more development in one village where this may support services in a village nearby.

13.7 National planning policy provides some flexibility for affordable housing developments on rural exception sites in locations where there is a local housing need. This is explored further in Section 16. Such schemes could include land identified by Community Land Trusts. The Council will work with the Devon Rural Housing Partnership in assessing rural housing need, and through its housing enabling role will support communities in bringing forward small-scale affordable housing schemes in suitable locations that can help people continue to live in rural parts of Mid Devon where they work or have a strong local connection.

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Question 45

What do you think are the top 5 main issues affecting the rural areas and villages in Mid Devon that need to be addressed in a new Local Plan? Please rank these in order of importance (1 = most important, 5 = least important)

Question 46

What do you think are the opportunities for us to consider in the future planning of the villages in Mid Devon, including locations that may be suitable for development?

Question 47

Which village(s) in Mid Devon do you think should have more development to support the provision of new and improved community facilities, and why? Please tell us the name of the village, the community facility needed, and provide your reasons why.



Question 48

Please tell us where more development at one village in Mid Devon could help sustain local shops and services at a village nearby?

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Rural economy

13.8 National planning policy makes clear that planning policies and decisions should support a prosperous rural economy through the sustainable growth and expansion of all types of business – through both conversion of existing buildings and well-designed new buildings. This can include farm diversification and the development of other land-based rural businesses.

13.9 Farming, is an important industry. It supplies most of our food and helps to influence the character and appearance of the countryside through the impact of farming practices and how land is managed. Agricultural Labour Force figures show 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.

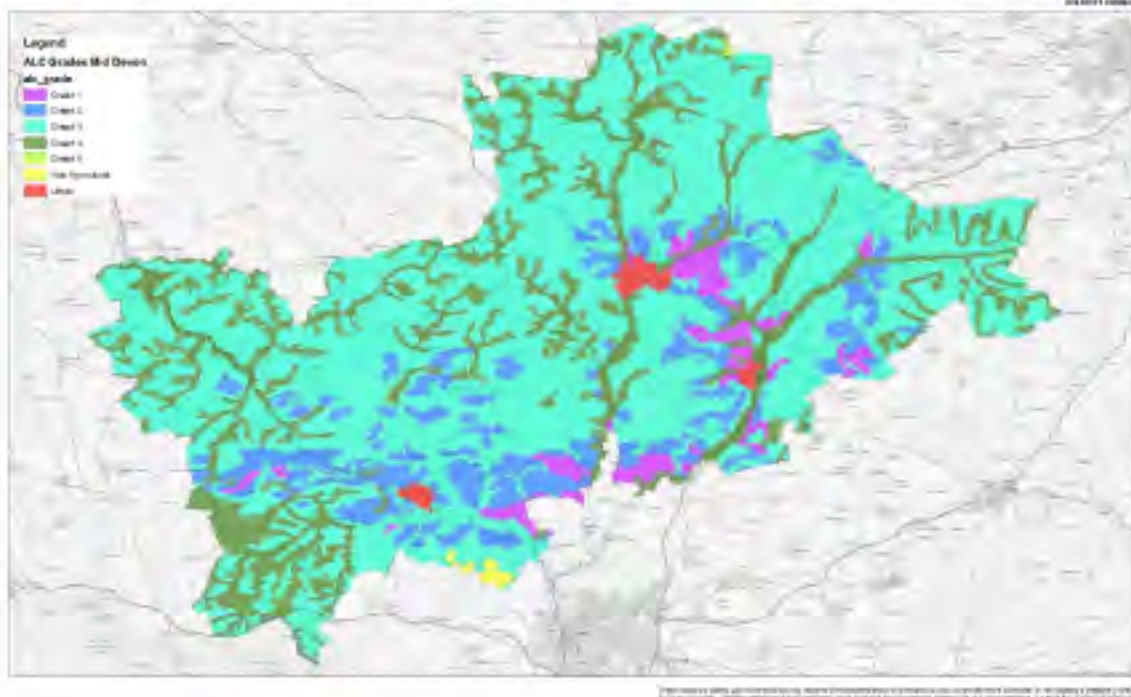
13.10 Yet, by and large, farming remains outside the country's land use planning system. This is since, under Town and Country Planning Act 1990 (TCPA 1990) "the use of any land for the purposes of agriculture or forestry... and the use for any of those purposes of any building occupied together with land so used" does not involve 'development'. Agriculture is defined as including: horticulture, fruit growing, seed growing, dairy farming, the breeding and keeping of livestock (including any creature kept for the production of food, wool, skins, or fur, or for the purpose of its use in farming the land), the use of land as grazing land, meadow land, osier land, market gardens and nursery grounds, and the use of land for woodlands where that use is ancillary to the farming of land for other agricultural purposes.

13.11 The TCPA 1990 defines 'development' as the "carrying out of building, engineering, mining or other operations in, on, over or under the land, or the making of any material change in the use of any buildings or other land". Therefore, development will have taken place on agricultural or forestry land where; it is proposed to change how land or buildings used for farming are used for something else; new dwellings; or, usually where applying for a grant to fund a project that needs a building or other development. In such instances planning permission will be required. However, certain developments may also be permitted e.g. on farms of 5 hectares or more there is a right to erect, extend or alter a building, carry out certain excavations and engineering operation; temporary uses of land, agricultural buildings below a certain size, forestry buildings, and caravan sites and related buildings in some circumstances.



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Protecting high grade agricultural land

13.12 Mid Devon is predominantly rural, with the majority of the total land area being in agricultural use. Nationally, the best and most versatile agricultural land includes land in grades 1, 2 and 3a of the Agricultural Land Classification. The majority of the district's agricultural land is in Grade 3 (65% of all the agricultural land), with 11% classed Grade 2 and 4% classed as the highest quality. Less than 46 hectares of agricultural land is deemed of the lowest quality, 0.1% of the total. National Planning Policy makes clear that planning policies and decisions should contribute to and enhance the natural and local environment, and recognise the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. However, it is recognised that poorer quality land can still have an important role in supporting farming, such as where grassland is used for producing silage.

Farm diversification

13.13 The DEFRA Farm Business Survey 2019/20 has found that 68% of farm businesses in England had some diversified activity (defined as non-agricultural work of an entrepreneurial nature on or off farm but which utilises farm resources). For 39% of farm businesses with diversified activities, income from these activities accounted for at least 25% of their total farm business income. While 19% of diversified farms had income from sport, recreation, tourism accommodation and catering, 33% of diversified farms had income from solar and other forms of renewable energy. Brexit, the loss of European Union support and the prospect of trade deals could see UK food produce undercut by imports and by products of different standards. This could accelerate the diversification of farms nationally and in Mid Devon. A report published by the NFU Mutual in 2021 has shown that of 1600 farmers surveyed nationally, 34% of those that had already diversified said they planned to diversify further.



13.14 Local Plans can help support the farming industry through policies that are permissive for diversification, where proposals can: sustain the long term operation of the farm business; do not compromise the working of the farm business, and for example, are located within or well-related to existing building groups. Development on farms requiring planning permission could include, for example new buildings for the processing of food and non-food produce, its packaging and distribution. This can add value to farm produce and provide more local job opportunities. The introduction of a farm shop could also provide a direct point of sale for farm produce to consumers, and in doing so be more sustainable through helping to reduce food miles and carbon emissions produced through transportation to a supermarket or shop. Other forms of farm diversification can include tourism related development (such as tourism accommodation) and visitor attractions, or energy generation.

13.15 Farms may diversify in other ways, without the need for planning permission and through changes in land management. This can be supported through the Government's Countryside Stewardship scheme and might include using farm land for conserving and restoring wildlife habitats, natural flood risk management, woodland creation and management, reducing water pollution from agriculture, keeping the character of the countryside, preserving historic features in the landscape, and encouraging educational access. Where securing biodiversity net gain in new development could only be achieved through offsite provision, this might include opportunities on farm land in Mid Devon. This will need to be investigated further as Plan Mid Devon is prepared, and through engagement with farmers and the development industry. The Food, Farming and Countryside Commission (FFCC) has recently funded work to establish a Devon land use framework that will consist a set of agreed principles, processes and practices that can be used by organisations to guide decision-making on land use in Devon. While this will not be a statutory development plan it may be used to help inform the preparation of Plan Mid Devon.

13.16 Mid Devon has experienced many proposals coming forward for commercial uses at properties or on smallholdings where no meaningful farming activity takes place, which is not seen as farm diversification but the industrialisation of the countryside and which can bring with it pressures from increased vehicular movements, pollution and impact on the rural character and setting of parts of the district. The changing nature of farming has also led to the need for larger and taller farm buildings, which often cannot be accommodated in the existing farmstead, leading to industrial sized structures in the countryside, while traditional farm buildings remain redundant. The district is currently experiencing many planning applications for holiday chalets, holiday lodges and glamping facilities, in locations which include open fields and are unrelated to existing settlements or farmstead. This may be a result of a bubble in domestic tourism market through the pandemic, however, it may not be economically sustainable in the longer term and could risk changing the character of the countryside. Mid Devon has also experienced a growing bio-energy industry and currently has 6 anaerobic digester plants, where the break-down of organic waste is used to generate biogas to produce heat and electricity. While energy recovery from waste can be a sustainable option, where that waste would otherwise go to landfill (and create landfill methane emissions), the practice has raised some concerns about impact on residential amenity through increased vehicular traffic (through bringing in waste, potentially from a wide catchment), the storage of materials, noise and disturbance, odour; and, landscape and visual impact, highways and access, drainage, ecology, pollution and contamination, archaeology, appearance and character.





13.17 The current Local Plan includes policies to support rural employment development in the countryside provided the development is of an appropriate use and scale for its location, and would not lead to an unacceptable impact on the local road network and to the character and appearance of the countryside. The plan also includes policies specifically in relation to levels of vehicular movement and pollution from traffic and other forms of pollution where development risks negatively impacting on the quality of the environment.

13.18 Plan Mid Devon provides an opportunity to look at what types of employment development may be acceptable in a rural location. While the new Local Plan must be consistent with national planning policy it should seek to avoid an industrialisation of the countryside. Consideration should be given to the cumulative impacts of employment development on the rural character of the district, and for the need to work closely with neighbouring local authorities to understand the pressures from such activities across the wider area and how to plan for these in a coordinated and effective manner to support rural prosperity but protect the natural environment. Proposals for commercial development in the countryside can also be subject to Environmental Impact Assessments (EIA) to assess their effect on the environment.

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Question 49

What types of non-farming activity do you think should be supported in the countryside and why?

Question 50

What types of non-farming activity do you think should NOT be supported in the countryside and why?

13.19 Diversification of the rural economy may be hampered by poor digital connectivity and there may be a need for greater investment in digital infrastructure to help unlock rural economic growth, and maintain sustainable communities and improve social inclusion. Where Plan Mid Devon may provide for some growth at villages this could provide opportunities to help achieve improvements to digital infrastructure than benefit rural communities. The Council will work with providers of digital infrastructure to help coordinate investment in locations where development is planned.

Question 51

How should the Council provide more support for the growth and prosperity of the rural economy?



Neighbourhood Planning in rural areas

13.20 At the time of writing, the only Neighbourhood Plan currently being prepared outside the three main towns is for Silverton Parish, although interest has been expressed by several other parish councils.

13.21 The Silverton Neighbourhood Plan is expected to reach its Regulation 14 stage in the near future, and includes policies on protecting and enhancing natural and historic environment, community and recreational spaces and housing. The neighbourhood plan also calls for protecting local green spaces and public rights of way, high quality design of development and minimising flood risk. The Plan also points out issues such as lack of community spaces, lack of employment opportunities in the village, pressure of development and consequentially traffic because of its proximity to Cullompton, Tiverton and Exeter.



CULM GARDEN VILLAGE

14.1 The Culm Garden Village proposal is one of only 14 areas awarded Garden Village status by the Government in January 2017. Mid Devon's expression of interest for the Garden Village identified the potential to deliver up to 5,000 sustainable new homes in a country park landscape, with jobs, community facilities and transport, all integrated with Cullompton itself. 1,750 of these homes are already planned at East Cullompton through the current adopted Local Plan for the period to 2033 and there is provision for a further 850 new homes beyond. The development of a garden village in this location will build on the strategy of the current Local Plan, where Cullompton will be the strategic focus of new development in Mid Devon due to its accessibility, economic potential and environmental capacity.



14.2 The new Local Plan will need to carry forward the current planned development at East Cullompton together with the Garden Village proposal. This will include detailed policy for the area that will be identified through preparing the new Local Plan, including the provision and phasing of new infrastructure and transport improvements. The planning of the Culm Garden Village will need to include the provision of new schools, shops, services, health care and employment and supporting infrastructure. It will also include other benefits such as new open space, recreation and sports facilities and opportunities for walking, cycling, and access to the countryside. Our understanding of what is required will need to be informed through technical work. The ability to deliver these benefits through the planning process will principally be through developer contributions, together with other potential sources of funding which will be investigated. Flexibility to the plan for more than the 5,000 homes currently envisaged could help achieve greater benefits for the Culm Garden Village and wider Cullompton area in terms of community facilities and other infrastructure, and this can be investigated as part of the technical work that will be undertaken to inform the preparation of the new Local Plan. Development of the Culm Garden Village is expected to extend beyond 2043, which is why Plan Mid Devon will have a vision that looks further ahead (to 2053).

14.3 The Culm Garden Village will be a flagship development for the District, and will have an important role to play in showcasing high quality design of new development. The planning of the Garden Village will embrace 'Garden Community Principles' based on those first introduced in late 1800s and which have been tailored for the 21st Century. These aim to create diverse and healthy communities, high-quality affordable housing and locally accessible work, enhancing the natural environment, protecting biodiversity, using zero carbon and energy positive technology and creating green infrastructure networks. They have integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.





14.4 The Culm Garden Village is subject to ongoing masterplanning work. A stage 1 public consultation has been undertaken on a 'Vision and Concept for the Culm Garden Village' and an 'East Cullompton Masterplan Supplementary Planning Document Issues, Opportunities and Concepts' for the first phase of the Culm Garden Village. That engagement has identified a number of priorities that need to be addressed:

- Masterplanning should be landscape-led, building on the area's natural assets and creating quality green and blue infrastructure.
- Climate change, including opportunities for low carbon development, should be a key focus for the development.
- Natural flood management and sustainable urban drainage should form a key aspect of flood risk mitigation.
- Active transport (walking, cycling, public transport – bus and rail) should be the main transport choice.
- Improvements to the strategic road network
- The garden village should promote links (physical, social and economic) with Cullompton.
- The garden village should be self-sustaining with good employment and skills opportunities.
- Urban design should focus on a high quality living environment, taking into account the health and well-being of future residents.

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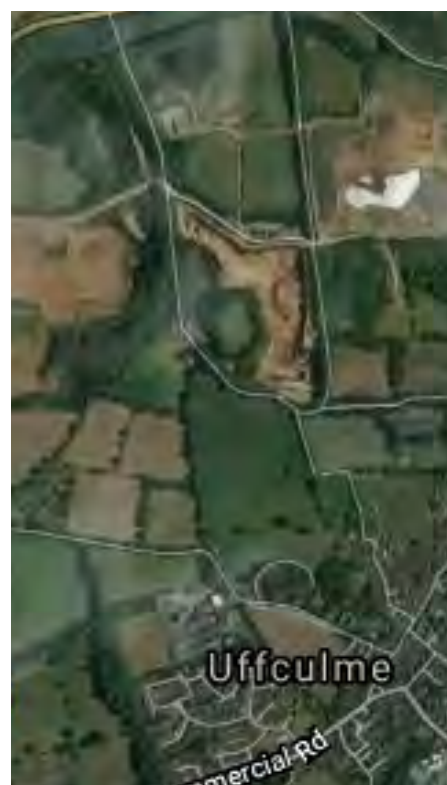
Question 52

What things do you think should be included in the planning of the Culm Garden Village to make it a successful place to live, work and visit? Please rank in their order of importance (where 1 is the most important)



PROPOSALS AT JUNCTION 27 M5 MOTORWAY

15.1 Undeveloped land adjacent to Junction 27 on the M5 presents a major opportunity for the future planning of Mid Devon, with potential to serve as an arrival point and gateway for visitors to the district and beyond, as a destination point and attraction in its own right than can benefit the local economy.



15.2 The current local plan includes provision for a major high quality regional tourism, leisure and retail attraction adjacent to Junction 27 on the M5 motorway, together with ancillary roadside services and supporting infrastructure including a pedestrian bridge linking the site to Tiverton Parkway railway station. The new Local Plan can take these proposals forward in their current form or could provide an opportunity to revisit them should circumstances have changed where there is a need to reconsider the suitability of land uses in this location. At this stage there is uncertainty over what medium and longer term impact there will be on the Mid Devon economy that may arise from both the United Kingdom leaving the European Union and also the COVID-19 pandemic. Technical studies and assumptions made in the formulation of the current proposals for Junction 27 may need to be updated as the new Local Plan is being prepared. The potential for new homes to be planned at Junction 27 has previously been explored through the preparation of the current Local Plan, However, this option was not taken forward since it was not considered to be a sustainable location away from an established settlement and local shops and services. However, Junction 27 may no longer be a location that is economically viable for a major retail attraction and this might have implications for the uses currently planned for.



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Question 53

Do you think we should:

- **Continue with current Local Plan proposals to develop land at Junction 27 for a major high quality regional tourism, leisure and retail attraction?**
- **Reconsider the current Local Plan proposals through updated technical studies and assumptions?**
- **Other (please state what this should be)**



A SUSTAINABLE DISTRIBUTION OF DEVELOPMENT ACROSS MID DEVON

16.1 The new Local Plan will need to set out an overall strategy for the pattern, scale and quality of development across Mid Devon to meet our needs – including new homes, employment, retail, leisure, other commercial development, infrastructure for transport, telecommunications and other matters, community facilities (including health and education), and also for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure. The strategy will be informed through technical evidence including housing need, job opportunities, the availability of suitable locations and sites for development, infrastructure requirements, viability, physical constraints, and environmental matters. Inappropriate development in areas at risk of flooding, including where development could increase flood risk elsewhere, will be avoided. It will also be guided by national planning policy and achieving sustainable development, and the top priorities that we have identified for preparing the new Local Plan including responding to the climate emergency and moving to a net-zero carbon future.



16.2 To achieve sustainable development the spatial strategy of the current Local Plan identifies Cullompton as the strategic focus of new development, Tiverton and Crediton as secondary focus of new development, and more modest growth at villages. The current Local Plan sets out the amount (minimum dwellings) and distribution of development across the district as follows: Tiverton (2,358 (30%)), Cullompton (3,930 (50%)), Crediton (786 (10%)) and Rural (786 (10%)).

Main towns

16.3 The three main towns of Tiverton, Cullompton and Crediton are Mid Devon's most sustainable settlements due to their existing shops and services, facilities, employment opportunities, infrastructure and level of accessibility to the transport network. Additionally, they are where local housing need is greatest and where opportunities can exist to reduce the need to travel, particularly by car and instead walk, cycle or use public transport to help reduce carbon dioxide emissions, other pollutants and traffic congestion. For these reasons the three main towns should continue to be where most new development is planned. However, each town is affected to a greater or lesser extent by physical constraints to future growth, including topography, areas at risk of flooding, protected landscapes and settings, and barriers such as roads or rivers. They may also have other constraints in terms of the current capacity of local schools, transport network and other infrastructure. The strategy for the pattern of development will also be informed through technical studies, including an assessment of land that is available, suitable in planning terms, is capable of being achieved in the period of the Local Plan and would be viable (where there may be requirements for the provision of infrastructure or affordable housing).

Designated villages for limited development

16.4 The current local plan designates 22 rural settlements across Mid Devon as 'villages suitable for limited development'. They include:

Bampton, Bow, Bradninch, Chawleigh, Cheriton Bishop, Cheriton Fitzpaine, Copplestone, Culmstock, Halberton, Hemyock, Holcombe Rogus, Kentisbeare, Lapford, Morchard Bishop, Newton St Cyres, Sampford Peverell, Sandford, Silverton, Thorverton, Uffculme, Willand and Yeoford.

16.5 These are places that provide a limited level of services (education, convenience store, transport service) which support vibrant rural communities and which are suitable for a limited level of development meeting local needs appropriate for their individual opportunities. This can include housing to meet identified local housing needs. Development at these villages can be limited to within defined settlement limits and to allocations, and could help attract investment to support and improve local services, facilities and infrastructure where they may be needed, and may benefit adjacent communities where there is a need to travel further to these. National planning policy makes clear where there are groups of smaller settlements, development in one village may support services in a village nearby.



16.6 Plan Mid Devon can provide an opportunity to reconsider what level of services are needed for a rural settlement to be suitable for development to meet local needs, and also where by allowing some growth this could help retain existing and attract new facilities to support and improve local sustainability and the concept of a 20 minute neighbourhood. New technologies through improved broadband connections have meant that many are now able to work from home and also make use of home deliveries for shopping. This has helped to reduce the need to travel and associated traffic congestion. The increased ownership of electric cars and phasing out of petrol and diesel vehicles nationally will also continue to reduce pollutants from exhaust emissions. These trends have been accentuated through the COVID-19 pandemic.



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Question 54

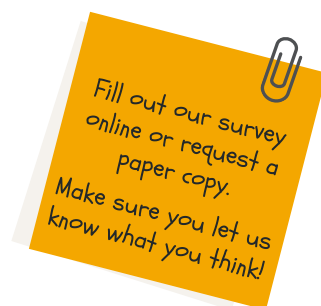
What measures do you think we should take through Plan Mid Devon to support viable communities in the rural parts of the district?

- **Continue to restrict development to the currently designated 22 rural settlements based on their level of services (Yes/No)**
- **Identify certain settlements to grow as service centres for a local hinterland including nearby villages and hamlets (Yes/No)**
- **Allow limited development at more villages and hamlets to help meet identified local housing need, where these have good digital communications (broadband / wireless internet / satellite) (Yes/No)**
- **Other (please tell us what this is and why)**

Rural exceptions sites

16.7 National planning policy makes clear the Council should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and allow some market housing on these to help facilitate them. The current Local Plan allows rural exceptions sites within or adjoining a settlement, which can include Tiverton, Cullompton and Crediton, and also the 22 rural settlements designated as villages suitable for limited development.





16.8 While sites that are allocated for new housing development at the main towns will include a proportion of affordable housing, the proximity of local services can justify affordable housing on exceptions sites adjoining the defined settlement boundaries where there continues to be an unmet housing need and where other planning considerations (such as access, landscape impact, etc.) can be met. This flexible approach could include the consideration of development proposals for affordable housing on sites adjoining Tiverton, Cullompton and Crediton that were not brought forward by land owners at the time that the Local Plan was being prepared. The national planning policy framework makes clear Local Planning Authorities should support the development of 'entry-level' exception sites (distinguished from rural exception sites), suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is not already being met in their area. These should be on land which is not already allocated for housing, and be adjacent to existing settlements, proportionate in size to them and not compromise the protection given to areas or assets of particular importance and meet local design standards. Plan Mid Devon will provide an opportunity to consider how to plan for 'entry-level' exceptions sites.

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New homes elsewhere in the countryside

16.9 Outside the main towns and villages, development is currently restricted to agriculture and other appropriate rural uses where this can help promote a strong rural economy, enhance or maintain the vitality of rural communities, whilst retaining the intrinsic character and beauty of the countryside. While national planning policy makes clear that isolated new homes in the countryside should be avoided, there is a scope for Plan Mid Devon to include policies to support dwellings outside the main towns and designated rural settlements where there is an essential need for a rural worker; where the development would represent the optimal viable use of or secure the future of a heritage asset; it would reuse redundant or disused buildings; it would replace or involve the subdivision of an existing residential building; or would provide accommodation for gypsies and travellers. In question 54 we have asked whether Plan Mid Devon should include scope for limited development at more villages and hamlets to help meet identified local housing need, where these have good digital communications (broadband / wireless internet / satellite) and could support viable communities in rural parts of the district.

Question 55

What other things do you think we should take into consideration in a strategy for the broad distribution of development in the new Local Plan for Mid Devon?

Question 56

Are there any other issues that we have not identified or other matters that we have not discussed which you think are important to the future planning of Mid Devon? (Please tell us what these are and why)

NEXT STEPS

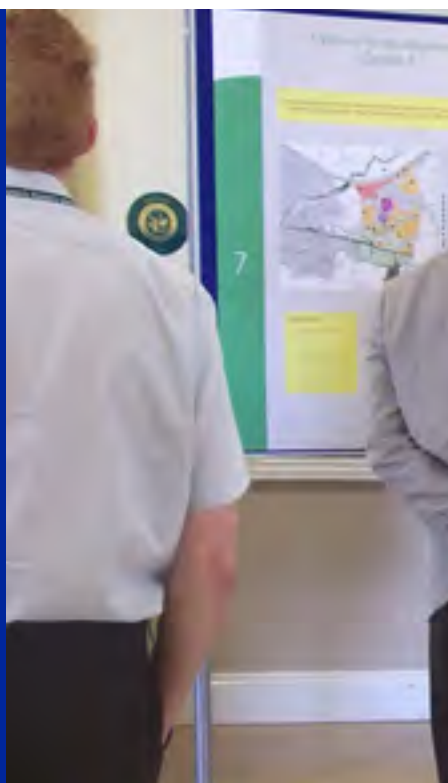
Consultation responses

17.1 This Issues Paper is the first key stage in preparing a new Local Plan for Mid Devon. Once the consultation has ended we will read through and carefully consider all the responses that we have received. We will use this information, alongside technical studies and other evidence to develop our understanding about what new development is needed to provide homes, jobs, community facilities, health, education, transport and other infrastructure and help us think about how Mid Devon should be planned in the future to meet the challenges of climate change.

17.2 All consultation responses will be published on our website and made publicly available, together with a report summarising what those responses were.

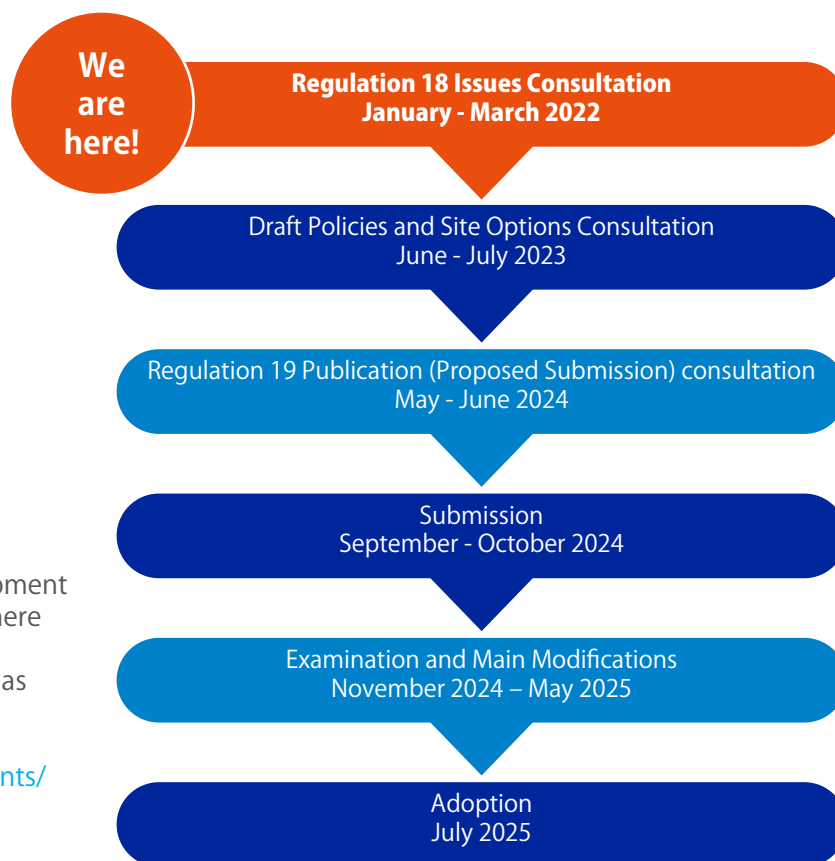
Duty to cooperate

17.3 There is a legal duty placed on the Council to engage constructively, actively and on an ongoing basis with other local authorities and prescribed organisations in relation to strategic matters when preparing a new local plan, including those matters that cross the district boundary. We will continue to engage with Government agencies, Devon County Council, neighbouring district Councils, Town and Parish Councils, the NHS, transport and other infrastructure providers over the coming months to help us think about how to plan Mid Devon.



Timetable

17.4 The timetable for preparing Plan Mid Devon is set out in the Mid Devon Local Development Scheme:



17.5 The Mid Devon Local Development Scheme is published on our website here and will be kept under review as the plan making progresses and updated as necessary.

<https://www.middevon.gov.uk/residents/planning-policy/local-development-scheme/>

Draft Policies and Site Options stage

17.6 The timetable shows that we intend to publish and consult on a 'Draft Policies and Site Options' paper in the spring of 2023. This will provide you with a further opportunity to have your say, at an early stage in the preparation of the new Local Plan, on a set of draft policies and also potential locations across the district for new development – it could include a range of alternative options and also identify those options which are preferred. This stage can include consideration of potential alternative options for the area of land at Cullompton that will form the Culm Garden Village. The Draft Policies and Site Options stage will be an important step towards a completed draft plan in 2024.

Planning reforms

17.7 In August 2020 the Government published and consulted on a set of reforms to the planning system through the white paper "Planning for the Future". These proposals include simplifying the role of Local Plans, so that they identify areas for growth, renewal and protection, they include clear rules rather than general policies for development, and that they are visual, map based and standardised. The Government envisages that Local Plans will be shorter in length, limited to no more than setting out site or area-specific parameters and opportunities and will be prepared to meet a statutory timetable (of no more than 30 months in total) for the key stages of the process. While further details are awaited, it is likely that the preparation of Plan Mid Devon will be affected by reforms to the planning system where these may be introduced over the next several years. For the time being we will continue to prepare the new Local Plan following the current legislation, national planning policy framework and planning guidance.

APPENDIX 1 - GLOSSARY

Affordable housing:

A term which relates to housing which is either for sale or for rent – or a combination of both – at below current market values. Typically, it takes the form of social rented, shared ownership, key worker, outright below market sale or below market rent in the private sector.

Article 4 Direction:

A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area.

Brownfield land:

See previously developed land.

Carbon neutral:

Achieving an equal balance between the amount of carbon emitted to the atmosphere by an activity with the amount of carbon absorbed from the atmosphere by a natural carbon store, such as a woodland, or a technological process such as carbon capture and storage.

Carbon offset:

An action intended to compensate for the emission of carbon dioxide into the atmosphere, such as tree planting.

Climate Change Adaptation:

Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

Climate Change Mitigation:

Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Co-housing:

A group of homes that include some shared facilities (areas, rooms, equipment, or services for particular activities). They are intentional communities, created and run by their residents. Residents come together to manage their community, share activities, and regularly eat together.

Community led housing:

Community groups managing housing projects that build decent and affordable homes. The groups also manage empty homes and buildings so that those can be brought back into use to meet local housing needs. Projects are usually developed by or in partnership with a community organisation. The local community organisation owns, manages or provides stewardship of the homes and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.

Custom and self-build:

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing.

Designated heritage asset:

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development Plan:

A set of documents that includes adopted Local Plans, Neighbourhood Plans and the Waste and Minerals Local Plan. Planning applications have to be decided in accordance with the Development Plan unless material considerations indicate otherwise. All development plan documents are subject to public consultation and independent examination.

Embodied carbon/energy:

The total life cycle carbon or energy used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Equalities Impact Assessment (EqIA):

Analysis of the potential and actual effects of a policy on vulnerable groups and make suitable modifications to reduce or avoid any negative impact.

Fabric first approach:

A technique which involves maximising the performance of the components and materials that make up the building structure, before considering the use of mechanical or electrical building services systems.

Habitat Regulations Assessment (HRA):

A series of stages of assessment to determine whether proposed plans or projects may be capable of having a significant (adverse) effect on a site designated as containing habitats and species of European importance. The legal protection status conferred has been interpreted into British law and remains so post-Brexit.

Heat network:

Heat networks allow heat generated remotely to be used to provide heating and hot water to buildings connected to the network, which provides greater efficiency of space and energy use than individual conventional boilers. Heat networks also provide an opportunity for whole network decarbonisation, rather than house-by-house measures.

Heritage asset:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the Local Planning Authority (including local listing).

Housing market area:

A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. The Greater Exeter area broadly functions as a single housing market area.

Infrastructure Delivery Plan (IDP):

A plan which identifies the infrastructure that is required to support new development, a growing population and the key aims of a development plan document. It provides clarity for councils, landowners, developers, infrastructure providers and the community about the infrastructure required, when it is needed, how much it will cost and how it will be funded.

Local Plan:

A plan for the future development of a local area, drawn up by the Local Planning Authority in consultation with the community. The Local Plan is part of a set of development plan documents.

Local Planning Authority (LPA):

A Local Planning Authority undertakes the town planning function at the local level (except minerals and waste planning which is undertaken at a County Council level).

Major development:

For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more.

National Planning Policy Framework (NPPF):

This sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a planning framework within which local people and the Council can produce their own distinctive local and neighbourhood plans, to reflect the needs and priorities of their local communities.

Neighbourhood Plan:

A Development Plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. They help decide the outcome of planning decisions, along with the Local Plan, national policy and other considerations and can help decide how the area should grow and develop, and what should be protected.

Net-zero (emissions):

Achieving an overall balance between emissions produced and emissions taken out of the atmosphere, resulting in neither a surplus nor a deficit of emissions when gains and losses are added together.

Open space:

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Passive design:

Approaches to building design and development masterplanning that maximise natural heating, cooling, lighting and ventilation opportunities, and minimise additional energy use for these purposes. These can include techniques that increase thermal massing and insulation and take account of orientation and solar gain.

Planning obligation:

See Section 106 Agreement.

Previously developed land:

Also known as brownfield land. Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape during the process of time.

Registered Provider (RP):

Organisations that provide affordable housing. Registered providers include local authority landlords and private registered providers, such as not-for-profit housing associations and for-profit organisations.

Renewable and low carbon energy: Energy that comes from resources which are naturally replenished on a human timescale such as sunlight, wind, rain, tides, waves, biomass and, although not strictly renewable, geothermal heat is generally included. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Renewable technology:

Using natural energy to make electricity. Fuel sources include wind, wave, marine, hydro, biomass and solar. It is also made using sources of natural energy that are quickly replaced, such as biomass.

Rural exception sites:

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the Local Planning Authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Section 106 Agreement (S106):

Legally enforceable agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that are used to help mitigate the specific impact of a development where it would generate additional needs e.g., on community infrastructure. Planning Obligations are calculated on a case by case basis.

Site of Special Scientific Interest (SSSI):

Legally protected areas of nature conservation and scientific value identified as being of national (and sometimes international) importance.

Small sites:

In order to help diversify the housing market, Local Planning Authorities are required to identify, in their development plans and brownfield registers, 10% of the housing requirement on sites no larger than 1 hectare in size unless there are strong reasons why this target cannot be achieved.

Social inclusion:

The position from where someone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers for people or for areas that experience a combination of linked problems such as unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown.

Strategic Environmental Assessment:

A procedure which requires the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.

Supplementary planning documents (SPD):

Add further detail to the policies in the Development Plan. They can be used to provide additional guidance for development on specific sites, or on particular issues, such as design or air quality. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the Development Plan.

Sustainability Appraisal:

A statutory requirement that is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

Viability appraisal:

The economic circumstances which would justify development taking place, determined by carrying out a financial assessment. It can be undertaken by either a local authority or a developer and is based on a comparison of development cost related to development value. It is used to ensure that policies, infrastructure requirements and affordable housing targets are realistic and deliverable and is primarily employed at the plan making stage.

Whole Life-Cycle (WLC) carbon emissions:

The total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, operation, maintenance and eventual material disposal.

Windfall sites:

Sites not specifically identified in the Development Plan.

Zero Carbon:

The emissions produced from a product or service produce no carbon.

REFERENCES

- ¹ Mitchell, T.A. (2017) *Devon and Districts Greenhouse Gas Inventory Calculator v.0.9*, University of Exeter
- ² Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by Section 182 of the Planning Act 2008
- ³ DCLG (2017) *Fixing our broken housing market*
- ⁴ Shelter (2021) *Denied the right to a safe home*
- ⁵ Devon Climate Assembly (September 2021) *How should Devon meet the big challenges of climate change?*
- ⁶ University of Exeter (February 2020) *2020 Low Carbon and Climate Change Evidence Base for the Greater Exeter Strategic Plan*
- ⁷ RICS (November 2017) *Whole life carbon assessment for the built environment*, 1st Ed.
- ⁸ Department for Digital, Culture, Media & Sport (2018) *Future Telecoms Infrastructure Review*
- ⁹ Ofcom (September 2021) *Connected Nations Update: Summer 2021*
- ¹⁰ ChamberlainWalker (December 2019) *Analysis of the economic benefits of self-build and custom housebuilding to the local economy*
- ¹¹ Planning Practice Guidance states that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes (i.e. the delivery of 300,000 homes a year nationally). The Government has advised that the 2016-based projections may under-represent household formation. The 2018-based population projections use only two years of internal migration estimates rather than the 5 years used previously. A two-year trend is much more susceptible to a single anomalous year driving the shape of the forward view than longer-term trends. It is therefore not supported by the Government for the standard method approach. The Government has confirmed that local authorities will not be able to use the 2014-based household projections as a reason to justify lowering their housing need.
- ¹² Office for National Statistics (2011) *Tenure by household size by number of rooms, Table DC4404EW*, Census 2011; Office for National Statistics (2001) *Tenure by household size by number of rooms, Table ST051*, Census 2001
- ¹³ Mid Devon District Council (2018) *Annual Monitoring Report*
- ¹⁴ Community Led Homes (2018) *What is community led housing?*
- ¹⁵ Welsh Government (January 2020) *One planet development: practice guidance*
- ¹⁶ One Planet Council (July 2010) *Planning for Sustainable Rural Communities*, Technical Advice Note 6
- ¹⁷ Mid Devon District Council (14 January 2021) *COVID-19 Economic Response Update*, Economy Policy Development Group, pp.17-24
- ¹⁸ Addison, J. (03 June 2020) *Green recovery of the economy and society after COVID-19: UK statement*, UK Delegation to the Organization for Security and Co-operation in Europe
- ¹⁹ Ellen MacArthur Foundation (n.d.) *What is a circular economy?*
- ²⁰ Department for Business, Energy & Industrial Strategy (November 2020) *The Ten Point Plan for a Green Industrial Revolution*
- ²¹ Ashworth, James (10 October 2021) *Analysis warns global biodiversity is below 'safe limit' ahead of COP 15*, Natural History Museum
- ²² Natural England (2021) *Carbon storage and sequestration by habitat: a review of the evidence*, 2nd Ed.
- ²³ Breeze, T. D. et al. (2012) *The decline of England's bees: policy review and recommendations*
- ²⁴ Ministry of Housing, Communities & Local Government (September 2019) *The English Indices of Deprivation 2019*
- ²⁵ Mid Devon District Council (2021) *New Build Homes Resident Survey 2021*



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