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Please ask for: George Marshall

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Date: 25 March 2022

Sent by email to: planmiddevon@middevon.gov.uk

Dear Sir/Madam

RE: Plan Mid Devon – Issues Consultation – Regulation 18

Thank you for the opportunity to comment on the Issues consultation document for the Mid Devon Local Plan. This letter provides the formal response of Exeter City Council.

We appreciate the Local Plan is in its very early stages and so specific proposals on strategy and development locations have yet to be decided. Having read through the consultation in full there are no specific comments we wish to make on the majority of questions posed in the document. Our response therefore focuses on improving transport connections between the two administrative areas and the development at Junction 27 of the M5.

Response to question 5: Reducing the need to travel by car

Prior to the pandemic, approximately 24% of workers that lived in Mid Devon commuted into Exeter for work. Although there has been a marked shift towards home-working, as we begin to see workers transition back into the office continued investment in sustainable transport links along the key routes into Exeter should be considered a key priority. In particular, investment should be focused towards maximising the linkages between Mid Devon's towns and the key areas of employment (City Centre, business parks and industrial estates) and training (Exeter College and the University) in order to reduce the reliance on the car and to minimise congestion in Exeter.

Response to question 53: Proposals at M5 junction

We welcome the fact that Mid Devon District Council are reviewing the existing Local Plan allocation in light of the uncertainty over the medium and long term impacts on the economy that may arise both from the Covid 19 pandemic and the UK's exit from the European Union.

You will be aware that Exeter City Council has previously raised concerns over the now adopted Mid Devon Local Plan Policy, J27, which allocates 71 hectares of land at Junction 27 of the M5 motorway for the provision of a major high quality regional tourism, leisure and retail attraction. There are specific concerns regarding the Outlet Shopping Village element.

At this point in the process we wish to reiterate our concerns to the continued inclusion of the retail elements of the Junction 27 proposals as currently adopted. ECC is unconvinced about the robustness of the evidence base to demonstrate that there is a regional need for the amount of comparison goods floorspace included.

In addition, the Covid 19 pandemic, which has increased the prevalence of online shopping, casts further doubt on the viability of such a proposal and indeed, has the potential for driving retail trips away from established town and city centres at a time when they require more support than ever. This includes Exeter city centre.

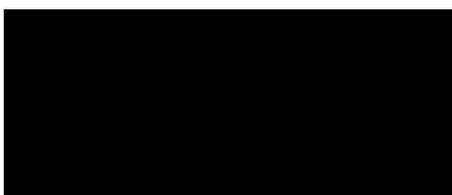
It is also felt that the continued inclusion of a proposal for a retail facility at an out-of-town location would rely heavily on car use and would therefore conflict with the overarching priority of the new Mid Devon Local Plan, which sets out the importance of responding to the climate emergency and moving to a net zero carbon future.

As such, in response to the question we feel that Mid Devon should “*Reconsider the current Local Plan proposals through updated technical studies and assumptions*”. We understand from prior discussions that Mid Devon will soon be embarking on a new retail needs assessment, and this new evidence is welcomed. Exeter itself is in the process of producing a city centre strategy and therefore we would hope that outputs from this could be used to inform any future development proposals at Junction 27.

Exeter City Council and Mid Devon District Council will continue to work closely on a variety of cross-boundary planning issues. In addition, we will also continue to provide specific feedback into the process as we progress through the development of our respective Local Plans through the duty to cooperate.

I hope these comments are helpful in progressing the Mid Devon Local Plan. If you have any questions please do not hesitate in contacting me.

Yours faithfully,



Bindu Arjoon
Deputy Chief Executive