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From: Gallacher, Gaynor
Sent: 14 April 2015 11:37
To: Local Plan Review
Cc:
Subject: Mid Devon Local Plan Review Submission Consultation - Highways England response
Attachments: SKMBT_42315041410151.pdf

Dear local plan team
 Please find attached Highways England's comments on the submission draft of your Local Plan and the supporting Strategic Highways Options Study prepared by Devon County Council.
 Regards
 Gaynor

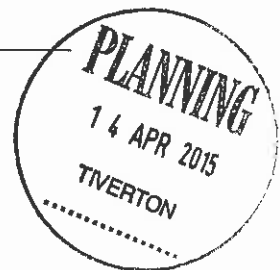
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Local Plan Review Consultation
Forward Planning
Mid Devon District Council
Phoenix House
Tiverton
EX16 6PP

4 April 2015

Via email: localplanreview@middevon.gov.uk



Dear Sir/Madam

M5 : Mid Devon Local Plan Review submission consultation

Thank you for providing Highways England (formerly the Highways Agency up to 1 April 2015) with the opportunity to comment on the Mid Devon Local Plan Review Proposed Submission consultation document. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN), which in Mid Devon comprises the M5. It is on the basis of these responsibilities that the comments that follow in this letter have been made.

The responses to this document should be read in conjunction with the response to the 'Assessment of Highway Options to Accommodate Potential Developments' document accompanying this letter, which reports the findings of traffic modelling work undertaken to understand the transport implications of a number of major development scenarios in the District.

Highways England is keen to ensure that policy takes account of the need for transport and land use planning to be closely integrated. In this respect, your attention is drawn to DfT Circular 02/2013 which sets out how we will engage with the planning system to deliver sustainable development.

Highways England recognises that prosperity depends on our roads, so aims to support growth and facilitate development, based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. In order to constructively engage in the local plan-making process we require a robust evidence-base so that sound advice can be given to local planning authorities in relation to the appropriateness of proposed development in relation to the SRN and the strategic highway and transport solutions that may be required to support potential site allocations.

Paragraph 12 of Circular 02/2013 states that *'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to*

the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'

Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the 'Highways Agency and the Local Plan Process' protocol – now applicable to Highways England.

Our comments on the parts of the documents which are relevant to the role and policies of Highways England are as follows.

Introduction

Highways England fully supports the principles of sustainable development that the Local Plan seeks to achieve, in line with the NPPF. We understand that in the medium to long term Cullompton is intended to become the strategic focus of new development, in the words of the Local Plan *'reflecting its accessibility, economic potential and environmental capacity.'* That said there is significant development proposed in other locations in the District, particularly Tiverton.

Development Strategy and Strategic Policies

We understand that the Local Plan sets out the development required in the District over the period 2013 to 2033 and that the levels of development identified are clearly evidenced based on the Strategic Housing Market Assessment, the Employment Land Review and the Retail Study. Highways England would not wish to comment specifically on the levels of development required and the need for this. Our comments relating to Tiverton, Cullompton and Crediton have been included under the Site Allocation section of this response to avoid repetition, but the principles of our comments in there relate to policies S10, 11 and 12 respectively.

Policy S1 Sustainable Development – Highways England would reiterate our support for sustainable development and the principles of the strategic priorities set out in Policy S1. The development focus at Tiverton, Cullompton and Crediton as Mid Devon's most sustainable settlements, with long term growth to the east of Cullompton, in principle is supported on the basis that evidence shows that the SRN can accommodate the growth or that satisfactory mitigation can be provided in accordance with Highways England policy. To this end Highways England supports the promotion of sustainable development by delivering appropriate infrastructure, reducing the need to travel by car, integrating public transport and other forms of sustainable travel.

Policy S2 Amount and distribution of development - Highways England supports the principle of locating development in the most sustainable locations, but we will need to be satisfied that the levels of development can be accommodated in these locations without severe impact on the SRN. If there is a severe impact then mitigation will need to be put in place. The evidence document *"Assessment of Highway Options to Accommodate Potential Developments"* sets out to investigate options for accommodating planned growth either through improvements to

existing M5 junctions or through the provision of a totally new motorway junction. For the latter to take place, the Secretary of State will need to be satisfied that it can be provided both safely and with a demonstrable benefit to the economy.

Policy S4 Ensuring Housing Delivery – as previously indicated Highways England is not seeking to challenge the housing numbers, but will need to ensure that the SRN can either accommodate development or that severe impacts can be satisfactorily mitigated. The targets for completion are set out, but if delivery rates fall, measures may be taken to bring forward development. This will only be able to take place if the infrastructure is in place to support the development, so the LPA will need to make sure that the programme for infrastructure provision is revised to reflect this too.

Policy S6 Employment – the principles for employment are the same as for housing development in terms of infrastructure requirements and impacts on the SRN. Highways England would encourage mixed use development and employment locations close to areas of residential development to reduce the need to travel by private car and encourage the use of sustainable means of travel.

Policy S8 Infrastructure – Highways England supports the principles of this policy, and would encourage the council to work with providers and developers to ensure that new development is served by the necessary infrastructure in a predictable, timely and effective manner. We are pleased to note that according to the supportive text this policy underpins the site allocation policies such as the large urban extensions. As per paragraph 18 of Circular 02/2013, infrastructure required for development should be identified at the Local Plan stage. Developers should contribute to, or bear the full cost of infrastructure as appropriate. Highways England welcomes the opportunity to be involved in the process through the Infrastructure Plan.

S13 Villages – Highways England has no objection to the principle of limited development in villages. The same principles apply as for larger developments in that applications must be supported by a robust transport evidence base in line with policy and guidance to ensure that proposals are properly assessed.

Site Allocations

S10 and TIV Policies Tiverton – as per previous comments made in respect of the Local Plan, Highways England is content that Tiverton will continue to develop in a balanced manner as a medium sized market town, welcoming the intention to increase self sufficiency of the town by improving access to housing, employment and services. We are encouraged by the Council's intention to seek developers to enhance walking and cycling opportunities and bus services around the town, improving access to the town centre and Tiverton Parkway, Exeter and Taunton.

The sites proposed to come forward in Tiverton if required, are significant in proportion to the size of the town, and although the main development would take place as part of the Eastern Urban Extension it is important to look at the overall impact on the SRN. The "Assessment of Highway Options to Accommodate Potential Developments" seems to be some way behind the Local Plan document and discusses three development scenarios for the District. However this Proposed Submission document goes beyond that and takes forward a single option and has identified specific sites and quantum for development. Highways England would therefore not consider that the Local Plan is based on sound transport evidence as the transport options assessment is yet to be concluded. More work is required to the evidence base to ensure that

the SRN can accommodate the Local Plan development, or that suitable mitigation is deliverable.

Highways England welcomes the transport provisions set out to support the Eastern Urban Extension in Policy TIV2, but notes that this seems to be localised with no mention of the M5. While Tiverton is not as close to the SRN as Cullompton, the cumulative impact of all development in the District needs to be taken into account when considering mitigation proposals.

S11 and CU Policies Cullompton – the location of Cullompton ensures that the SRN is the most sensitive to development in this location in Mid Devon. Highways England support the principles set out in Policy S11 in order to underpin this development in the town. It is imperative that any mitigation works necessary to accommodate the Local Plan development are deliverable.

As per our comments in relation to Tiverton, the transport evidence base does not seem to be at the same stage as the Local Plan. Mitigation works to M5 junction 28 are referred to in relation to East Cullompton, but in reality it is the cumulative impact of development in the town and the wider District that will also contribute to any required mitigation. This is briefly mentioned in Policy CU20, but needs to be brought out more in the text. The "Assessment of Highway Options to Accommodate Potential Developments" document states that it is already known that J28 has insufficient capacity to accommodate growth beyond the adopted Mid Devon Local Plan allocations. The conclusion of the report is that if the proposed development in Cullompton is taken forward then further work will need to be done to consider transport impacts. Options are considered in the report for a new motorway junction but much more work will need to be undertaken before it could be confirmed if such a scheme would be deliverable.

Circular 02/13 Paragraph 18 requires the mitigation works to be identified at Local Plan stage, but this is not possible if the transport evidence base is behind the stage the Local Plan is at in the process. Further work is therefore required to bring this up to speed to be able to identify specific mitigation works to the M5 as needed.

Highways England supports the potential reopening of the railway station in order to give people a sustainable transport choice from the town and reduce the need to travel by private car, easing potential issues on the M5.

S12 and CRE policies Crediton – Highways England has no objections in principle with development in Crediton, subject to the usual requirements considering possible impacts on the SRN. Due to its proximity to Exeter it is important that there is collaboration between the two LPAs and Highways England would also wish to be involved in this process. Mention is made in CRE11 in relation to infrastructure in the town, identified as 'Potential highway improvements'. This needs to be more specific and further work is required to the transport evidence base in order to be able to provide more detailed requirements in line with Circular 02/13, paragraph 18.

Rural Areas – Highways England has no comments to make relating to specific allocations in rural areas. That said the same principles apply and sites need to be taken into consideration in relation to the overall cumulative impact in the District on the SRN. Any applications for development that come forward will need to be supported by a robust transport evidence base in line with Policy.

Monitoring

Highways England is encouraged by the intention to produce an Annual Monitoring Report in order to assess progress with strategy and policy, including the delivery of development targets and CIL. It is imperative that infrastructure provision keeps up to speed with development rates in order to ensure that the necessary infrastructure is in place to support it.

Conclusions

The Local Plan proposals and strategy seem to be some way ahead of the transport evidence base that is being used to support it. More detailed comments are included in a separate submission in relation to the *'Assessment of Highway Options to Accommodate Potential Developments'* document as Highways England considers there to be significant further work necessary in order to establish transport impacts and therefore the necessary mitigation required to support development proposals set out in the Local Plan.

From the available evidence, the expansion of Cullompton would appear to be particularly problematic. The *"Assessment of Highway Options to Accommodate Potential Developments"* document states that it is already known that J28 has insufficient capacity to accommodate growth beyond the adopted Mid Devon Local Plan allocations. The conclusion of the report is that if the proposed development in Cullompton is taken forward then further work will need to be done to consider transport impacts. Options are considered in the report for a new motorway junction but much more work will need to be undertaken before it could be confirmed if such a scheme would be deliverable. It is Highways England's view that a plan based on necessary infrastructure that was not deliverable would be unsound.

The comments in this response do not prejudice any future responses on site specific matters and Highways England would request that we are involved at an early stage in the consultation process going forward. In the meantime should you wish to discuss the above, please do not hesitate to contact me.

Yours faithfully,
Sally Parish
Sally Parish
Sally Parish

CC: Chris Harding, CH2M Hill
Mike Howell, CH2M Hill
Dean Titchener, Mid Devon District Council
Jamie Hulland, Devon County Council
Stuart Jarvis, Devon County Council



Mid Devon Local Plan Review – Assessment of Highway Options to Accommodate Potential Developments

PREPARED FOR: Highways England (HE)

COPY TO:

PREPARED BY: Mike Howell

DATE: 13th April 2015

PROJECT NUMBER: 481795.HS.01.70

Introduction

The “Assessment of Highway Options to Accommodate Potential Developments” report dated August 2014 sets out to report the findings of traffic modelling work undertaken to understand the transport implications of a number of major development scenarios which are presented as 3 options. The three options comprise :-

- Option 1 - Expansion of existing towns – Tiverton and Cullompton
- Option 2a - A new community at Willand
- Option 2b - A new community at Cullompton

These options seek to accommodate up to 3,600 houses and 140,000m² of commercial floorspace. The assessment of these options has taken the adopted Mid Devon Local Plan allocations as committed development.

It is understood that some of the sites considered in the various options are already being promoted for development by the relevant landowners or agents. It is apparent from the proposed submission version of the Mid Devon Local Plan that Option 1 is to be pursued.

For option 1, only the proposed expansion of Tiverton has been assessed. This is reported to be on the basis that it is already known that J28 has insufficient capacity to accommodate growth beyond the adopted Mid Devon Local Plan allocations. The conclusion of the report is that if the proposed development in Cullompton is taken forward then further work will need to be done. Option 1 therefore only reports on the implications of that part of the development scenario at Tiverton. The evidence base to support option 1 is therefore incomplete.

For both options 2a and 2b it is reported likely that a new junction would be required on the M5 together with improvements to existing junctions.

The report is presented (at para 1.1.1) as a joint Devon County Council/Highways Agency (now Highways England) study, but it should be noted that Devon County Council were commissioned by Mid Devon District Council to undertake the study and that the Agency (Highways England) has had no involvement in the work undertaken or previously made comments on the findings.

Policy on New Accesses to the Motorway Network

It should be noted that on 1 April 2015 the Highways Agency became Highways England. Although the policies and guidance related to Local Plans and Highways England's involvement will change in the future, for the present, the relevant policies and guidance which applied to the Highways Agency apply equally to Highways England. The current policy of Highways England in respect of access to the Strategic Road Network is set out in paragraphs 37 to 44 of DfT Circular 02/2013. Paragraph 42 is pertinent here in that it precludes new accesses to Motorways.

However, Highways England were appointed by the Secretary of State under licence. That licence (Strategic Highways Company Licence) which came into force on 1st April 2015 includes (at paragraph 5.36) the requirement that Highways England must, unless otherwise directed by the Secretary of State, consider granting permission in light of the nature of the road in question and the consequences of the new connection, having particular regard to, in the case of sections of the network designed for highspeed traffic, with partially or comprehensively limited access, there should be a presumption against connection, except where it can be provided safely and where there is a demonstrable benefit to the economy.

Therefore, for a new motorway access to be acceptable to the Secretary of State it must pass two tests :-

- It must be capable of being provided safely
- There must be a demonstrable benefit to the economy.

In terms of the first test, it is considered that compliance with the Design Manual for Roads and Bridges would form the basis of the test. The information presented in the "Assessment of Highway Options to Accommodate Potential Developments" is considered below in relation to this first test.

No information has been provided in relation to the second test.

Assessment of Traffic Impact of Development Options

Traffic Generation

Traffic generation for the development options considered has been derived from trip rates obtained from the TRICS database. The trip rates appear to be reasonable for the purposes of the assessment undertaken.

It is not apparent that any consideration has been given to the benefits of promoting improved opportunities for walking, cycling and public transport trips in terms of reduced vehicular trip rates.

Trip Internalisation

The internalisation of traffic movements has been based on a global assumption rather than considering the balance of likely trip generators and trip attractors. The assumption made is that 10% of all trips would be internal to the development being considered.

Trip Internalisation is dependant on the mix of a specific development. Internalisation for a predominantly single land use development would be very low while internalisation for a truly mixed use development would be relatively high. Internalisation of trips in the AM peak period is particularly sensitive to the education provision within new developments although no relevant information is presented in the report. However, for the purposes of the assessment undertaken, the assumption of 10% internalisation is acceptable albeit if not overly robust.

Traffic Distribution

The derivation of trip distribution follows a number of different methodologies. Where transport assessments exist for developments which progressed through the planning system, the distribution from these has been used. For example, the Tiverton Urban Expansion TA has been used to derive the likely distribution for the Option 1 Tiverton development. This is acceptable.

For the development at Willand, a simple distribution has been assumed. The distribution is not however evidence based and comparisons with Census data should be made.

For the development at Cullompton, Census 2001 Travel to Work data has been used for all trip types. It should be noted that 2011 census data is now available and the distribution data should be updated accordingly.

Journey to work data is only relevant to work related journeys which have an origin in the census zone being considered. It is not applicable to journeys to and from employment areas. Further analysis should be undertaken to determine the distribution of employment trips.

Growth Factors

Background growth has been calculated using various methodologies. Where Saturn models exist (Tiverton and Cullompton), growth has been taken directly from these models to 2026. Tempro growth factors have then been applied to extend the forecasts to the end of the plan period (2033).

Where models do not exist (Willand), Tempro has been used to forecast from a base year.

The information presented in tables 11 and 12, do not appear to correlate with the methodology described however. For example, Table 12 is stated to report the growth factors for 2026 to 2033 but is labelled as 2011 to 2033. The growth factors are however higher than for Willand. Further clarification on the background growth assumptions is required.

At paragraph 5.3.5, J27 is highlighted as a summer issue (as is J28 later on). The junction serves three purposes. Local access, strategic access to the North Devon Link Road and access to the service area just to the east. In order to evaluate the junction performance under summer peak conditions, a simple method has been used to reflect the level of traffic growth in the summer. For this analysis, some traffic flows (shown in table 15) have been more than doubled. It is noted however that additional traffic counts are being sourced in order to refine the assessment undertaken.

The source of the growth factors in table 15 is not clear. Table 15 also needs to be further explained. It is not clear if factors are being applied to both the morning and evening peak hours. If so, the AM and PM peak hour factors would be the same and no tidality of summer traffic increases would be assumed. It is not clear if the demand created for traffic movement by the application of the summer peak factors has been considered in terms of the ability of the Taunton and Exeter junctions to accommodate the additional demand, and further afield the Bristol area to accommodate the increase in demand?

Also not clear is how the assessment of summer traffic flow conditions will be used to support the case for the improvement of J27. Para 7.3.1 seeks to justify a larger improvement scheme to accommodate summer peak traffic flow.

The role and impact of the service areas, off junctions, at J27 and J28 should also be considered.

It is not known whether the work undertaken has made any allowance for the strategy for the A303 route to the South West (refer to :-

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/410454/a303-stage-1-report.pdf).

Whether the route from London goes via A303/A30 or A358 will impact on this section of the M5. The report on the link above also contains some useful indicators of expected increases in traffic volumes.

Traffic Assignment

Again various methods have been utilised to determine the likely assignment of development traffic. For Tiverton, use has been made of Devon County Councils Tiverton Saturn Model. For development at Willand, a spreadsheet model has been used and for Cullompton Devon County Councils Cullompton Saturn Model has been used.

In the absence of a detailed review of either of the Saturn models or the Spreadsheet model it is not possible to reach a substantive position on the acceptability of the methodologies used to determine trip assignment. The models, together with a data collection report, Local Model Validation report and forecasting report are required for review before any weight can be attached to the model findings. Of particular interest would be how trips between models have been assigned.

However, given the scale of potential supporting highway infrastructure, the assignment of development trips together with the pattern of existing movements is likely to be very different when the highway improvement options are taken into account. The formation of a new access point to the motorway network could cause significant re-routing effects and a strategic model capable of accurately forecasting such effects would be significantly more extensive than is currently available. As the basis of seeking such large interventions is apparently to accommodate peak summer traffic volumes, there needs to be consideration of whether the network as a whole could 'deliver' the modelled traffic volumes. That is, more immediately, could the traffic volumes envisaged pass through the Taunton area and junctions, and the Exeter Area and junctions. Furthermore, the Bristol area will also be a constraint, certainly until there have been major improvements to the A303/A358 route. Hence, some logic checks on total demand on the network as a whole should be considered. The necessary study area could be considered to be the whole of the south west.

Given the scale of traffic growth forecast, peak spreading effects should also be considered. This would require the use of a variable demand style model as opposed to the fixed trip models which appear to have been used.

Improvement Options

It is recognised at paragraph 6.1.1 of the document that the improvement options identified are a first iteration of highway infrastructure measures that could be incorporated into the emerging Mid Devon Plan to facilitate the delivery of the development. The stated aim of the report is to carry out a preliminary assessment of options taking into account the costs, benefits and deliverability.

For option 1, improvement options are only considered for the local road network, the Blundells Road to Heathcoat Way link road in particular. No assessment is reported of the effect of the proposed development in Tiverton on the operation of the M5. New development in Tiverton could increase the demand for travel to and from Exeter which would impact on the operation of J27 and J28. It has already been highlighted that J28 has no spare capacity for additional growth beyond the adopted Mid Devon Local Plan allocations. Further work is therefore required to complete the evidence base for Option 1.

For option 2a, the suggested highway interventions consist of two parts, improvements to J27 and a new junction 27a on the M5 for which three options are presented. It is reported that the need for the new junction arises because development at Willand would generate a demand to travel south to join the motorway at Junction 28. The new junction is therefore presented as an alternative to improving Junction 28 which is severely constrained.

It is not apparent that any consideration has been given to closing either of the existing junctions and constructing a new higher capacity junction to accommodate forecast demand. The only alternative to the construction of a new motorway junction appears to be the Eastern relief road which is already included in the Local Plan but reportedly has delivery issues.

It is stated at paragraph 6.3.21 that the provision of J27A alone is not sufficient to accommodate both commercial and residential proposals at Willand, given that the majority of the northern section of development will wish to travel through the existing J27. This assumes however that the new junction would have no effect on existing movements through Junction 27. It may well be the case that the new junction would attract trips that would otherwise pass through J27, thereby freeing up capacity at J27 reducing or potentially removing the need for improvement. This has not been investigated however and provides further illustration as to why a wider strategic transport model is required if consideration is to be given to a new motorway junction. Such a model would be required in order to inform the economic case for a new junction in any event and without it the principle of a new access point to the Motorway network cannot be considered.

In the event that the principle of a new motorway junction is acceptable then none of the options presented appear to present any particular issues. Compliance with DMRB will depend on the traffic flows forecast to use the junction and satisfactory road safety and non-motorised user audits. The merge and diverge layouts will need to be given careful consideration as will the performance of junctions particularly at the ends of off-slips. There are also detailed consideration to be taken into account such as highway width horizontal and vertical alignment.

Conclusions

The “Assessment of Highway Options to Accommodate Potential Developments” report dated August 2014 sets out to report the findings of traffic modelling work undertaken to understand the transport implications of three options for strategic growth. The options seek to accommodate up to 3,600 houses and 140,000m² of commercial floorspace.

For two of the options it is reported likely that a new junction would be required on the M5 together with improvements to existing junctions. The evidence base for the third option is accepted as being incomplete, the main focus of the report being to gain approval in principal to the concept of a new motorway junction.

For a new motorway access to be acceptable to the Secretary of State it must pass two tests :-

- It must be capable of being provided safely and
- There must be a demonstrable benefit to the economy.

No information has been submitted in relation to the second test.

It should be noted that the proposed submission version of the Mid Devon Local Plan Review has been prepared on the basis of the expansion of Tiverton and Cullompton. This is the third option discussed above, ie, the option for which the evidence base is incomplete.

The work to date, in relation to local development traffic impacts in detail appears satisfactory if not overly robust. There is perhaps a need to review the trip generation and distribution methodologies as this is what is leading to the conclusion that a new motorway junction is required in relation to two of the options considered (refer to para 6.3.18). This approach appears to suggest an acceptance that opportunities for long distance commuting should be created.

Areas where more detailed consideration could be undertaken include :-

- Consideration of the peak hour trip generations used. These take no account of possible improvements to walking, cycling and public transport opportunities, which also may have benefits in terms of reducing existing trips.
- Consideration of the trip internalisation (10% internalisation has been assumed, but more critically, for Collumpton, census journey to work data has been used to distribute all trips. This has most likely overestimated the proportion of longer distance trips in the morning peak hour as generally only 50% or so of trips are commute trips).
- Consideration of peak spreading (this would require the development of a 'variable demand' style modelling, as opposed to fix trip).
- Consideration of alternatives (including junction relocation)

The demand created by the application of the growth factors should be considered in terms of the ability of the Taunton and Exeter junctions to accommodate the additional demand, and further afield the Bristol area to accommodate the demand? The change of traffic movements caused by the creation of a new motorway access point should also be considered. In order to adequately understand these points a significantly more extensive model than is currently available would be required. The necessary study area could be considered to be the whole of the south west. Such a model would be required to inform the business case for funding and the assessment of economic benefit required by the Secretary of State.

The conclusion of the review of the submitted report is that it contains no "show stoppers" but much more evidence is required before the principle and detail of a new motorway access point could be properly considered.

For the option which forms the basis of the proposed submission version of the Mid Devon Local Plan Review, Highways England require the complete evidence base before substantive comments can be provided.