

From: Local Plan Review
Subject: FW: Local Plan Review 2013 - 2033 - January 2017 - Submission by Willand Parish Council
Attachments: 201700209 MDDC LOCAL PLAN REVIEW 2013 Willand PC response.pdf
Importance: High

From: Barry G J Warren [REDACTED]
Sent: 12 February 2017 07:14
To: Local Plan Review
Cc: Kate Taylor; Richard Chesterton; Gillian Doe; Bob Evans; Nick Bartlett; Keith Grantham; William Tobin; John Sellick; Richard Phare; Tony Mander; Frances Wilcox
Subject: Local Plan Review 2013 - 2033 - January 2017 - Submission by Willand Parish Council
Importance: High

Dear Sirs,
Please find attached the response from Willand Parish Council which all but one councillor are in full support of.
This has been prepared having taken account of the views of parishioners who have expressed views.
An acknowledgement of receipt of this response would be appreciated prior to the consultation closure period to ensure that our views are recorded.
Yours faithfully
Barry G J Warren
Chair
Willand Parish Council

44/S27/MOD

44/DM2/MOD

44/VSS/MOD

44/DM12/MOD

44/DEVSTRA/MOD

44/S27MAF/MOD

44/S2/MOD

44/S3/MOD

44/S6/MOD

44/S7/MOD

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44/W12/MOD



WILLAND PARISH COUNCIL

MDDC LOCAL PLAN REVIEW 2013 – 2033 Proposed Submission (incorporating proposed modifications) JANUARY 2017

GENERAL COMMENTS ON WHOLE PLAN

1. The plan presented to be submitted is **considered to be UNSOUND** with the inclusion of the allocation of the land at Junction 27. The prime reasons for this are as follows:

- The deviation from the unanimous decision by MDDC councillors in 2014 NOT to include this land in the local plan;
- The published plan for submission in February 2015 was and is considered by officers to be SOUND;
- The dialogue and representations, including a number of changes to the area of land allocation, which have involved one 'developer';
- The questionable process of presentations and information provided to councillors and the 'management' of meetings at which the decision was made to make an allocation of land;
- The presentation, practicalities of delivery and contents of Policy J27 [pages 128 – 129 of plan].

1.2 These issues will be dealt with in detail later in the response but comment is now made following the page numbering and paragraphs of the report.

2.1 Page 12, J27 M5 Motorway: It is stated that the "Development will be targeted to: *Provide a high quality tourist and leisure focused development to meet needs identified within the tourism study.*

Associated outlet/discounted retail floorspace to meet a regional comparison floorspace need and deliver the tourist and leisure elements of the allocation.

Safeguarding existing town centres through planning controls.

Ensuring enhanced linkages to Tiverton and Cullompton and the National Rail Network.

Mitigating environmental impacts.

Upgrading directly affected transport infrastructure."

2.2 The first two points are considered to be contradictory as elsewhere in evidence documentation it is clearly stated that the outlet/discount retail floor space will be needed to financially support other elements of the proposed development.

3.1 Page 23, Paragraph 2.1b: Discussion at Council Meetings has allocated 260 houses on two sites to cater for J27 employment [see paragraphs 6.1 & 15.1 below] whereas this paragraph states a need of 393.

3.2 What figures are to be relied on for sound judgement to be made?

4.1 Page 29 Paragraph 2.15 contains the following sentence: *"In addition the Local Plan makes provision for a further 29% commercial floorspace at Junction 27 for a high quality tourist and leisure focussed development to meet needs identified within the tourism study."*

4.2 This response will later question this statement on the grounds of 'high quality' and whether or not it meets 'identified needs within the tourism study'.

4.3 The same paragraph further states: *"The allocated sites have been subject to Strategic Commercial Land Availability Assessment (SCLAA) and are considered available, suitable and achievable."*

4.4 The site marked on the map for Junction 27 in the plan is not fully available as at least one landowner has stated his opposition and will not sell. This land partially bisects the block of allocated land. It has been stated publicly by a Councillor Cabinet Member responsible for Planning and Regeneration, a Ward Councillor and the Council Chief Executive that compulsory purchase measures would not be used to obtain any of the land. [Willand Parish Council 14 July 2016 Minute 6(d)] The suitability of the land will be the subject of representation later in this response.

5.1 Pages 32 – 33 Policy S2. The Policy uses the following words: *"In addition, development as proposed at Junction 27 of the M5 meets a tourism/leisure need in a location which is suitable for its regional role with a controlled retail element supporting the tourism and leisure aspects of the proposal."* At Paragraph 2.25a it further states: *"In addition to the development targets as set out in the policy above, land at Junction 27 is allocated for 42,550 sqm of commercial floorspace to meet a tourism/leisure need in a location suitable for its regional role with a retail element supporting the tourism and leisure aspects of the proposal. This will provide a high quality tourist and leisure focussed development to meet needs identified within the tourism study."*

5.2 The justification to describe what is proposed as 'high quality' will be challenged later in this response. The dictionary describes 'high quality' as 'very good' and no more.

6.1 Page 35 Policy S3 Paragraph 2.26 states in relation to J27 employment *"This Local Plan sets a housing target of 393 dwellings, above the housing need range set in the SHMA to ensure that housing provision in the plan is consistent with the additional need arising from job creation at Junction 27 of the M5."* See paragraph 3 above.

6.2 There could also be confusion between the housing figures in Policy S3 a) and figures given for concluded housing need in Paragraph 2.26.

7.1 Page 42 Policy S6 refers to employment needs of the community and at Paragraph 2.46 it states: *"In addition, development as proposed at Junction 27 of the M5 meets a tourism/leisure need in a location which is suitable for its regional role with a controlled retail element supporting the tourism and leisure aspects of the proposal."*

7.2 The proposal may create more employment but the majority of the jobs will be low paid and possibly zero hours rated and a certain amount will be seasonal only. Many will have to commute in as in December 2016 a local study showed that there were less than 250 unemployed in the whole of Mid Devon.

8.1 Page 44 Policy S7 Paragraph 2.48 states in relation to J27: *"The allocation of land at Junction 27 to provide a high quality tourist and leisure focused development to meet needs identified within the tourism study will include associated outlet/discounted retail floorspace to meet a regional comparison floorspace need and deliver the tourist and leisure elements of the allocation. Existing town centres will be safeguarded through planning controls."*

8.2 How can one safeguard existing town centres through planning controls when there is an out of town complex which over time will change the tenancy of their premises to ensure viability by occupancy and these shops then duplicate what is in a town centre where parking controls may be more stringent and difficult? This then potentially favours the 'out of town' facility.

9.1 Page 150 Policy WI1. Whilst appreciating the need for villages to accommodate additional housing this proposal is considered disproportionate allocation for the size of the village and the fact that it is outside of the settlement area. The location is not good for a number of reasons as outlines in the Parish Council response of January 2014 [attached at Appendix A – Paragraphs 1 and 5.4 mainly refer.]

10.1 Page 151 Policy WI2. This amendment is supported to include the additional land for Employment purposes.

11.1 Page 155 Paragraph 4.6 line 7: The wording appears to have omitted something. Should the word *land* be inserted between 'of' & 'suitable' or similar?

12.1 Page 170 Paragraph 4.41 line 6: There is no longer a criterion (g).

LAND AT JUNCTION 27 Policy J27

13.1 The inclusion of the land at J27 is considered not to be for sound reasons and concerns which have been outlined in respective responses of Willand Parish Council in January 2014 [Appendix A – paragraphs 7 & 8 in particular] and February 2015 [Appendix B – paragraphs 7 & 8.2 in particular]. A copy of the original land offer map is also attached [Appendix C]. It is concerning to note the way arguments in early discussions and reports on the local plan have apparently now achieved a 'U' turn all because one 'developer' has argued that the plan is unsound without the inclusion of the land to suit their vision.

13.2 The following concerns, information and opinion are submitted for consideration.

14. *The deviation from the unanimous decision by MDDC councillors in 2014 NOT to include this land in the local plan;*

14.1 The possibility of land at Junction 27 of the M5 being used for some form of commercial development has been discussed for some years but it was always said that any such development should be 'exceptional'. That now appears to have been reduced to 'high quality'.

14.2 Available land allocation was put forward by *Westwood* and this is shown surrounded in blue on the appropriate map [attached Appendix C]. It will be noted that there was a large area of land for housing also shown. It will also be noted that the current proposed area has moved south to include some of the original land put forward for housing.

14.3 Representation was made by Willand Parish Council in July 2013 in response to the Scoping Report on the Local Plan where opposition was registered to any development at J27 for many of the reasons set out in paragraph 2.31 of that report.

14.4 Discussions were held by the MDDC Cabinet and then the Full Council and at both meetings there was a unanimous decision that no land would be included in the plan for any development in the vicinity of J27. These meetings were attended by members of the public and other than comments by representatives of *Westwood* and some landowners the vast majority of representations were against the inclusion of the land at J27.

15. *The published plan for submission in February 2015 was and is considered by officers to be SOUND;*

15.1 It appears that the plan was not submitted and in a report to the Cabinet on 21 November 2016 the Head of Planning and Regeneration wrote in paragraph 1.1: *"However following that consultation the need for additional technical work was identified in order to ensure that the evidence base would be more robust prior to submission."*

In Paragraph 1.2 she further wrote: *"The need for additional technical evidence has resulted in a delay in submitting the plan. This external technical work has been reliant on statutory consultee involvement which has taken much longer than anticipated to complete. During this time the Council, at its meeting of 22 September 2016, also resolved to allocate land at Junction 27 of the M5 motorway for leisure, retail and tourism together with associated additional housing sites at Blundells Road, Tiverton and Higher Town, Sampford Peverell. This has resulted in the plan needing to be updated to incorporate these changes and to make the corresponding amendments such as the impact on overall housing and commercial land supply distribution for the district."*

15.2 Representations were summarised in paragraph 2.2 of the above mentioned report and in relation to J27 it states: *"e) Junction 27 M5. This site was not recommended for allocation in the Proposed Submission Local Plan, nevertheless it received a significant number of comments. Of those that responded the majority supported the decision not to include the site as an allocation in the Proposed Submission Local Plan. Those that objected to its exclusion cited the positive impact of the development to tourism and leisure and the position of the site having excellent infrastructure connections."*

15.3 Paragraph 3.3 of the same report contains the following sentence: *"The role and benefits of the proposed allocation at J27 have been acknowledged throughout the document."* It is contended that the plan is therefore biased in favour of including the land, contrary to the majority of public representations against its inclusion as identified at paragraph 15.2 above.

16. *The dialogue and representations, including a number of changes to the area of land allocation, which have involved one 'developer';*

16.1 The decision making process to include the current package of land has been reached as the result of many amendments put forwards by Eden Westwood. These amendments have been arrived at as the result of discussions with one developer and then MDDC has tried to check facts through the employment of their own consultants.

16.2 Support to justify the concerns of this whole process being carried through to the potential benefit of one developer can be seen through reading the report of the head of Planning and Regeneration to Cabinet on 15 September 2016. This is too comprehensive to repeat here but some key points to emphasise parish's representations can be taken from the following texts:

1.9 The Proposed Submission Local Plan was subject to public consultation between 9th February and 27th April 2015. Representations were received from both the promoters (Hallam Land Management and Eden Westwood) of the J27 options allocation.

*1.10 They both identify why, in their view, the Proposed Submission Local Plan as published would **not be sound** without an allocation at J27.*

1.11 Hallam Land's Representation – seeks the inclusion of the whole J27 policy option, 200 hectares, as originally consulted on for both employment and housing. This representation promotes this site as an alternative to the strategic mixed development site east of Cullompton.

1.12 Eden Westwood's Representation - is promoting a commercial allocation only, seeking the allocation of 98 hectares of land north and south of the A38 east of Junction 27 (M5) for tourism, leisure, retail and employment development for the following components:

☐ 'The Eden Ark' an Agronomy Centre visitor attraction

☐ Outdoor surfing reef and leisure activity zone

☐ A themed hotel

☐ Visitor centre serving Devon and the south west

☐ 17000 sq m Designer Outlet Village (2000 of which is A3 Café's and restaurants)

☐ Roadside Services (including a budget hotel)

☐ 750,000 sq ft Warehousing and Distribution (Class B8).

16.3 It will be noted that the proposed allocation for the warehousing and distribution area to the north of the A38 has now been removed from the allocation and this was dictated by the developer with officers making immediate response as evidenced by an email sent out by the MDDC Chief Executive on 7 July 2016:

See our press release for immediate issue please (the promoter's original is beneath in italics for information):

On response to this change, Mid Devon Chief Executive Stephen Walford said 'This is a significant change to the proposal being put forward and will inevitably change a lot of the impacts that have been discussed thus far. We will of course be continuing to work with the developers as part of the pre-application process to understand what this means in terms of the various technical implications associated with their proposal.'

A spokesman for Eden Westwood said today

"The decision has been taken to no longer seek the inclusion of the 750,000 sq ft logistics hub on land to the north of A38 in the Eden Westwood proposals. The principal objective for the Eden Westwood team is to create a unique destination celebrating food, farming and life in Devon. Whilst we feel the inclusion of the logistics hub was part of that story in terms of facilitating the export of Devon's food and goods to the rest of the UK and beyond at this strategic location, it's clear our seeking to include it was negatively impacting on how the wider more substantive vision for the site was perceived."

16.4 It will be noted that the allocation in the plan results in amendment but it is questioned how an artificial lake, beach and out of town shopping centre etc. reflects *"a unique destination celebrating food, farming and life in Devon."*

17. *The questionable process of presentations and information provided to councillors and the 'management' of meetings at which the decision was made to make an allocation of land;*

17.1 Concern has been expressed by Councillors and members of the community as to the way that the change has been brought about with continued statements that the processes going through Cabinet and Full Council were not to do with Eden Westwood Proposals but to do with land allocation. Presentations have been given by officers which have used slides of drawings circulated by Eden Westwood; words have been used on presentation slides and in reports which are a direct 'lift' from Eden Westwood publicity material displayed at public presentations. Attempts have been made to explain this away as only being 'indicative'! Some supporting councillors even forgot the 'script' and openly referred to the *Eden Westwood* proposals at council meetings.

17.2 Minutes of meetings have shown full detail of public questions, many of which have never been satisfactorily answered; considerable detail has been recorded of officer presentations yet the alleged debate by councillors has been time restricted to a few minutes and concerns or points made have been recorded under brief bullet points. One has to listen to the full tape recording to understand the full discussion. Many members of the community and even some councillors have no confidence in the process by which the current position has been arrived at. It is submitted that this **brings into question the 'soundness' of the plan if elements of it do not enjoy the support or confidence of the vast majority of the community.**

18. *The presentation, practicalities of delivery and contents of Policy J27 [pages 128 – 129 of plan].*

18.1 It is submitted that if the allocation of this land is to be included Policy J27 on page 128 should be amended to allow a more open, imaginative and sound opportunity to provide an exceptional and major tourism and leisure attraction worthy of the loss of such green open space with its agricultural and wildlife benefits to the area. The current proposal is too restrictive and not reflective of some of the evidence contained in the reports submitted as evidence to support the policy.

18.2 The suggested amendments are signified with text struck through and any additions/amendments in red.

Land at Junction 27 of the M5 Motorway

A site of approximately 71 hectares adjoining the south bound carriageway of the M5 motorway, adjacent to junction 27 is identified for major development. The land, which lies to the south of the A38, is allocated for the provision of a major high-quality exceptional regional tourism and leisure and retail attraction supported by ancillary roadside services and supporting infrastructure including a pedestrian bridge across the M5 motorway linking the site to Tiverton Parkway railway station.

The site provides a prime potential location for delivery of a major and exceptional leisure destination, themed around agriculture and the agri-economy; the regional environment and tourism; outdoor land and water based adventure activities and outlet retailing. The site provides a major opportunity to deliver a unique leisure destination at the gateway to Devon and Cornwall which should be realised as a single cohesive and comprehensively masterplanned visitor attraction.

~~The allocation makes provision for the following elements:~~

- ~~– Travel Hub (7ha) – Motorway/roadside services; electric car hub; hotel.~~
- ~~– Agronomy Visitor Centre (9ha) – exhibition space and hall, gallery; research and education space; regional visitor centre and hotel. The Agronomy centre will include up to 1,000 square metres of ancillary retail.~~
- ~~– Outdoor Adventure Zone (6ha) – Surf lake/lagoon; beach; high ropes adventure area.~~
- ~~– Outlet Shopping Village (6ha) – Designer outlet shopping centre retailing controlled goods comprising discontinued/end of range lines, seconds and surplus/sample stock. The Outlet Shopping Village to include up to 14,000 square metres of controlled comparison goods and up to 2,000 square metres of A3 uses.~~

The development is subject to the following:

- a) Provision of supporting access roads, parking and infrastructure/landscaping (43ha);
- b) Provision of transport improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway; and pedestrian and cycling links across the motorway to Tiverton Parkway Railway Station;
- c) Environmental protection and enhancement including noise mitigation;
- d) A comprehensive phasing programme to ensure the tourist and leisure provisions are delivered at the same time as the ancillary roadside services and supporting infrastructure as the retail and service elements of the development; and
- e) Prior to the approval of any planning permission for the site any required mitigation measures for the Culm Grasslands Special Area of Conservation shall be identified and agreed together with a time-scale for their provision and a mechanism for their maintenance.

Development of the site should be brought forward in accordance with the terms of a detailed development brief, comprehensive masterplanning including at least two

stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document before any planning application for any part of the site is determined.

18.3 Elements of the identified provision of leisure facilities are not compatible with the findings of the Mid Devon Tourism Study November 2014 prepared by G L Hearn Ltd.

18.3.1 It is recognised that a lot of people visiting Mid Devon are older and looking for quiet enjoyment of the countryside with walks and cycle rides. Older independents are showing an increase with a rise of 4% per annum since 2007. *"The trend suggests that middle aged people without children and particular older people who have retired or are or nearing retirement could be the key growth markets for tourism within the UK, particularly given demographics whereby the population of older persons is expected to grow quite strongly over the next 20 years."*

It is questioned as to how this potential growth market will be attracted to a facility of surfing or swinging through trees on ropes?

18.3.2 The tourist requirements/attractions for Mid Devon are further emphasised in a 2016 report by South West Research Company Ltd. It was found that Mid Devon was predominantly a day visit destination. It was noted that the visitors were in the 45 -54 years age group and the 55+ age group which accounted for 58% of all visitors. Visitors particularly enjoy the countryside, the scenery, friendliness, natural beauty of the district and walking in the area. [See Mid Devon Gazette 31 January 2017] No mention of the things planned for this site which will despoil a large area of countryside including established pockets of woodland.

18.3.3 Natural surfing facilities are available less than an hour away on the North Devon coast where they will cost little or nothing. A 'bear trail' has opened and is being further developed just south of Cullompton and this is in the form of a minor military obstacle course with various obstacles and rope climbs. It is questionable if there is need for a further facility without affecting the viability of such facilities.

18.4 Various retail studies show that local town centres are 'fragile' and edge of town developments where parking is easier are drawing people away from town centres. There are also 'on line' purchases to be considered.

18.4.1 It is not conceivable that another out of town shopping centre, in this case in open countryside, will benefit the town centres of Tiverton or Cullompton or even other nearby towns. Some of these facilities are already available on the outskirts of Exeter and Taunton and further afield in North Devon and at Street, Somerset or even Bristol.

18.4.2 Much is being made of the fact that this facility will have shops selling high quality goods through outlet and discount retail floorspace. It further states (page 129 paragraph 3.184c) that *"existing town centres will be safeguarded through planning controls."* No mention is made as to what this means and in fact once permission is given for a number of outlets (*shops*) the market viability will demand that they be filled with whatever or whoever is prepared to rent the space. The writer is aware of discussions within some existing town centre businesses who are already considering a 'move' to J27 if it opened thereby adversely affecting the relevant town centre.

18.5 There have been a number of 'transport studies and assessments' but in the main these have been restricted to potential impact on Junction 27 and a section of the A38 up to a new roundabout to service the site. There are much wider issues which will be adversely affected or have an effect on the proposal. These are already in place or have been approved. No proactive consideration has been given to the improvement of the Waterloo Cross Roundabout – A38/B3181 junction. No consideration has been given to improvements on the B3181 to Willand which is experiencing increased heavy goods vehicle traffic and will receive more cars as developments come forward. Surely local knowledge and observations should carry similar weight to 'desk studies'?

18.5.1 Junction 27 has recently been improved with a view to making sure that there are no tail backs onto the motorway. This has improved the situation for the M5 but still fails at peak time and particularly in the summer. It now causes tailbacks onto some of the feeder roads, particularly the A361 North Devon Link Road.

18.5.2 The proposal for the cycle and footbridge over the M5 to Tiverton Parkway sounds commendable BUT what is the view of Highways England, Network Rail and the Department of Transport? Is the land available and suitable adjoining the railway? Will this conflict with any M5 junction improvements?

18.5.3 Additional building in North Devon and a major extension at Tiverton will increase traffic flows on the A361 in both directions and much of this will flow through J27.

18.5.4 An increase in quarry and aggregate operations to the north of Waterloo cross will increase heavy goods vehicle traffic from that direction which will be in conflict with traffic to the proposed site and then onto J27.

18.5.5 When the motorway closes the B3181 becomes the diversion route to Cullompton south bound. The A38 to Wellington becomes the diversion route to the north.

18.5.6 Extensive housing development to the north of Cullompton is to have a road made to the Willand Road (B3181) which will mean traffic wishing to go north will come up the B3181 to access the M5. The same will apply to additional sites approved or applied for in Uffculme and Willand.

18.5.7 Existing Industrial and distribution sites in Willand and Uffculme are growing to meet demand and heavy goods vehicles servicing these sites are increasing. The Mid Devon Business Park has outline planning permission to more than double in size. The Two Sister poultry processing plant is vastly increasing the output from its operation. A new anaerobic digester has been built on the edge of the village which has permission to bring in food waste and other feedstock from a wide area with a condition that it all comes through J27 and down the B3181. A junction on this road goes off to service Uffculme Secondary School and this junction has a concerning accident record.

18.6 The proposed allocation of this land will result in the loss of agricultural land, considerable natural habitat and displacement of wildlife. Small areas of established woodland will have to be felled to permit the proposed development. The current grassland and woodland hold water during heavy periods of rainfall and these will be lost allowing the potential faster flow of surface water downstream. A whole new system will have to be provided to deal with sewage and surface water. Will there be the facilities to cater for the extra electricity, gas and water needed?

18.6.1 The detail of the wildlife and environmental concerns are fully set out within paragraph 7 of Willand Parish Council response as set out in Appendix A attached to this response.

18.7 In July 2013, at the start of a consultative process, a Scoping Report was circulated for comment. Comments made in that report show that there has now been a complete turnaround of policy with what is now being proposed.

18.7.1 On the subject of current town centres in a table attached to paragraph 1.30 of the report is the following comment:- *"Declining town centre health with town centre with regeneration likely to be affected by new out-of-centre development."*

18.7.2 On the subject of employment floorspace at paragraph 2.25 it advises that employment floorspace is to be mostly distributed in the three main towns. In paragraph 2.29 it advises that the guiding principle in the allocation of employment sites in the towns was allowing jobs to be accessed by walking, cycling or public transport.

18.7.3 Paragraph 2.31 of the same report did not consider J 27 to be commercially attractive or suitable for significant office development and the growing demand for distribution space was being and could be met elsewhere. The full paragraph should be read to understand the full context. Paragraph 2.32 reports: *"The Council recently asked its Citizens Panel to comment on different approaches to planning for employment. Responses indicated most support for the improvement and redevelopment of town centres and encouragement of development that creates jobs. The allocation of large sites for employment was not preferred."*

CONCLUSION

19.1 The comments contained in the General Comments section at the beginning of this response unconnected with the inclusion of land at J27 are self explanatory.

19.2 There has been so much written about the exclusion and inclusion of J27 in cannot all be included in this response. It is hoped that those responsible for reviewing the plan for 'soundness' will consider the whole history before reaching a decision. The vast majority of people living in the area do not support the inclusion of this land for development at the gateway to Devon and Cornwall.

19.3 The Parish Council would wish to have a representative address the Inspector on these issues should it be so permitted.

APPENDIX 'A'



WILLAND PARISH COUNCIL

Response to Local Plan Review Options Consultation January 2014

1. Preamble.

1.1 Willand Parish physical boundary is quite small when considered against surrounding Parishes. It has a clearly defined settlement area which has been imposed as the result of previous consultations and decision making processes.

1.2 It has the M5 motorway and the main rail line for the South West running through it. The main road servicing the village is the B3181 which bisects the village and is used as a relief road between J27 and J28 when the motorway becomes closed. It is also used as a 'shortcut' by a number of heavy goods vehicles on a daily basis in spite of the weight restriction limit through the village. There are flood plains which virtually restrict three sides of the Parish.

1.3 Over the years, particularly since the 1990's, there has been considerable expansion of housing most of which has been achieved WITHOUT matching or proportionate infrastructure provision. There has also been a proportionate provision of 'industrial/employment' land/buildings some of which still has spare capacity. Further industrial development has been provided in adjoining Parishes very close to the Willand Boundary. This provision is still being increased at this time. All have a direct impact on Willand village in some way.

1.4 The current 'head count' is 3,500+ residents in about 1,500 properties. Building densities are above 'Parish' recommendations in some areas.

1.5 There is considerable strong feeling that the village has been overdeveloped.

1.6 In terms of under provision of infrastructure the following issues are raised (in no particular order) to support that view:

- a) Other than the roundabout at Four Cross Way no improvement has been made to the B3181 through the village;
- b) The village has no 'identifiable' centre or focal point;
- c) Public open space is limited. There are small play areas dotted around the village with limited facilities. There is one larger area behind the village hall which is half owned by the Parish and the other half by Mid Devon District Council [MDDC]. Some areas are unusable at 'wet' times of year. Some areas are poorly maintained. The football club field is private and NOT a public open space (some facilities – mainly the club room, not the pitch, – can be hired);

- d) The village hall, although added to over the years and greatly used, is limited in capacity and cannot fully cater for larger village events;
- e) There are a number of tennis courts - they are 'private' but can be hired;
- f) Willand Primary School is already over capacity and regularly has to use the village hall for a number of activities. Some minor building expansion is taking place but the provision of additional class rooms would lead to loss of already limited play area;
- g) The preschool is at capacity with no room to expand;
- h) The Youth Club and other 'youth related' groups are at capacity in numbers and available facilities;
- i) The only car park is owned by the Village Hall and is regularly full as it is used by the school as they have limited facilities;
- j) Design of development has resulted in insufficient parking provision which is resulting in the village having an 'on street' parking problem in many areas;
- k) Public transport is quite good for most of the day, although recently slightly reduced. It does not directly service the Willand Moor area. Links with Taunton are limited;
- l) Medical provision is limited and sporadic which means that many consultations/treatments require travel to Cullompton, Tiverton or Exeter;
- m) Previous provisions for retail and other facilities in development have been lost through viability (profit) arguments and so we have houses where there should have been retail and other facilities;
- n) Although an excellent facility in the village the Post Office is now considered to be too small with no room to expand;
- o) The allotments are full with a waiting list;
- p) The cemetery has room for expansion but this is only planned to deal with current housing/population numbers.

17 There are plans for a Health and Community Centre to be provided by the Parish Council at The Gables but this is in its infancy and could be 10 years before this facility maximises the full potential of what the Parish Council hopes to achieve on this site due to the needs of fundraising.

2. The Consultation Process.

2.1 In the near past consultation has taken place on business applications for J27, Local Plan Policy [LP 3] and the July 2013 Scoping Consultation by means of Parish Councillors and Volunteer Helpers speaking to individuals and 'group/society leaders' and giving feedback leading to discussion at scheduled Parish Council Meetings which were open to the public. A consensual response has then been submitted to MDDC.

2.2 The same process was followed in relation to the '**Options Consultation**' but due to the size and content of the document discussions at scheduled Parish Council Meetings were spread over a number of meetings whereby a larger picture of the potential implications became apparent.

2.3 Parish Councillors received a presentation from a potential developer in relation to J27. An explanation of the proposals was received from a District Councillor. They also attended a presentation by MDDC officers which was held at the Village Hall. A number of parishioners also attended. Meetings and other communication took place with adjoining Parish/Town Councils which gave rise to a concern that a number of 'variations' of

information were in evidence. The veracity of some of the information caused concern. Indications were that some landowners were not committed to the extent that other interested parties were telling councillors. This was confirmed at a public meeting by a major land owner for the J27 project.

2.4 Feedback to Parish Councillors gave cause for concern that the impact of the various options, particularly those linked to the J27 – Willand option, would affect the future wellbeing of Willand, its inadequate infrastructure and its residents. It was decided to hold a full consultation with the whole Parish.

2.5 Publicity for the '**Options Consultation**' and a public meeting was achieved via the media, posters and verbal communication at village events and by way of a leaflet drop through every door in Willand with the Willand Magazine which also contained an explanatory article.

2.6 A number of residents, some of whom would not be able to attend the meeting, sent emails and letters to the Parish Council with their views which have been taken into account in the preparation of the Parish response. They were also encouraged to share their response by writing to MDDC.

2.7 A Parish Meeting was held in the Village Hall at 1900 hours on Friday 7th March 2014 which was attended by over 300 residents (seating taken and standing room only for some). The County Councillor and three District Councillors were also present together with MDDC Head of Planning and Regeneration. A presentation of the proposals was given by the Parish Council with assistance in answering questions by MDDC Head of Planning and Regeneration. Comments made at this meeting are also considered in this response.

3. Format of Response.

3.1 The response is divided into six sections:

- A. Observations on the proposed overall policy which will apply to all areas [Para 4];
- B. Response to proposed housing sites within Willand Parish [Para 5];
- C. Response to proposed business/employment sites within Willand Parish [Para 6];
- D. Response to Junction 27 and Willand S3 Option 2a total proposals [Para 7];
- E. Response to the proposed business/retail/leisure facility at J27 [Para 8];
- F. Response to the option which would see a new housing development between Willand and J27 [Para 9].

3.2 It should be noted at this point that the Junction 27/Willand Option is not in Willand Parish but spread between three adjoining parishes – Halberton (mainly the housing), Burlescombe (leisure/retail) and Sampford Peverell (business). Although not in the parish of Willand each proposal is likely to have a greater affect on Willand than the host parish.

4. Observations on the proposed overall policy which will apply to all areas.

4.1 Whereas there is general support for the proposed 'Sustainable Development Principles' and 'Housing', issues raised in the immediate following paragraphs are submitted for consideration.

4.2 **Policy S2:** It is suggested that an additional paragraph be added to the priorities outline:- **m) Retaining sufficient areas of good agricultural land to support local provision of food and bio fuel production.**

4.3 **Policy S3. - Para. 2.11:** There is very small minority support in Willand for 'economic development at Junction 27 of the M5...'. The general feeling is that it will take employment opportunity away from designated employment sites in Willand and create greater 'travel to work' related issues including potential effects on carbon footprint and clean air issues. [See section 7 later]. The Scoping report 'showed little support for this option' and paragraph 2.31 of that document states that development at Junction 27 could cause displacement from elsewhere. What has changed to offer an alternative stance now?

4.2 **Policy S4 - Para. 2.25:** Whereas the issue of 'traveller sites' needs to be addressed it is thought that 'viability' issues may be raised by developers by not being able to sell 'market housing' adjoining such sites. This suggestion may not be practically achievable.

4.3 **Policy S6:** Experience has shown that some land set aside by developers as public open space, particularly to be used as play or sports areas are on poor quality or poorly drained land. It is considered that the policy would be enhanced by the inclusion of a suitable clause to ensure quality provision of such space.

4.4 **Policy S11:** It has been questioned as to why no figure has been shown for Tiverton in the event of an Option 2 development being adopted which could mean a reduction in requirement from Tiverton?

4.5 **Policy S14:** Most of the development proposed for Willand is outside of the recognised agreed Settlement Area so therefore later suggested sites would not appear to fit into this policy. If it is argued that the policy set out in the second paragraph at c) applies - does 300+ houses [a 20% increase] accord with the description of 'limited development'?

5. Proposed Housing Site in Willand Parish [Para 3.107].

5.1 It is intended to respond to each site individually BUT the following three facts/observations/concerns apply to all of the following sites within Willand Parish:

- a) None of the proposed sites is within the Willand Settlement Area and they could be argued to be contrary to proposed policy **S14**.
- b) Very strong concerns are raised as to previous experience of lack of suitable infrastructure being supplied on previous developments for various reasons/arguments. These are recorded at length in Paragraph 1.6 above. These concerns would need to be positively addressed in relation to each of these proposed sites.
- c) Proposed housing densities are shown as 40 units per hectare but Willand is a designated village and it is argued that densities should not exceed an average of 30 units per hectare.

5.2 **Quicks Farm:** A small part of this site is already designated as an exception site for 9 houses and it is understood the one landowner now owns the whole proposed site. The following concerns/observations are brought to attention for consideration:

- a) Concern has been expressed at the loss of productive agricultural land and how this is likely to affect the viability of the rented farm;
- b) Strong concerns have been expressed as to the vehicle access for the proposed development as to link into the current estate would cause access difficulties into Willand Moor Road where residents consider current junctions 'difficult'. If a new access were to be made onto the Uffculme Road [B3440] the following considerations/problems would need to be addressed:
 - Extension of the 30mph speed limit towards Uffculme to slow traffic as it is on a very straight section of road with a registered speeding enforcement problem;
 - Provision of roundabout or other traffic calming measure but this would have limitations due to the number of heavy goods vehicles using this section of road;
 - There is no pavement/footpath towards the village which would be needed for access to village facilities.
- c) No support has been stated for this extended development from those currently living on Willand Moor;
- d) If the development of this site should be approved the opportunity should be taken to extend and probably divert the Culm Valley Trail to progress this recreational facility;
- e) Willand Parish Council is **still opposed** to any further development, particularly outside of the Settlement Area, as recognised in the Options Consultation Document. A practical viewpoint is taken by Parish Council that if a site is needed for additional housing this would be the preferred site as it would incorporate the affordable housing exception site and the Settlement Area could be extended to the farm lane – provided the issues in 5.1 b) and c) were addressed.

5.3 **Land Adjacent to the B3181:** This site is already allocated as an Exception Site and a planning application is already being considered for 7 Affordable Houses on one part of the site. The issues raised by Parish Council in paragraph 5.1 apply to the rest of the site. There are no representations to remove this site from any future plan.

5.4 **Land East of M5 (off Meadow Park):** This site is adjacent to the M5 motorway on one side which runs at a slightly higher level than the land. Currently it is used for growing crops but it is appreciated that the land owner has some restrictions on its use as it is somewhat isolated from his main operations giving rise to 'security' issues. The following concerns/observations are brought to attention for consideration:

- a) The land is relatively flat and is seen to 'hold water' when it rains and appears to have a natural drainage problem. There are some surface drainage ditches along some of the hedgerows. Local residents have raised concerns as to impact on surface water and sewage disposal on the current estate in the light of their current experiences. They suggest early specific consultation with the relevant agencies;
- b) The North/North East boundary of the land is edged by a public footpath which runs from the B3181 to the motorway boundary and into Meadow Park. This footpath is heavily

used for recreational purposes, primarily by dog walkers, and is the last in the village not to be covered in tarmac/concrete. It is seen locally as a 'country walk' and if development takes place strong argument would be made for this footpath to be retained.

c) This same boundary is edged for approximately half its length by mature protected woodland and a suitable margin would be needed as would the rest of the boundary hedge which contains mature trees.

d) Concerns are expressed as to how suitable access would be achieved as only one obvious point is apparent without affecting the protected woodland.

e) If this development were to be allowed it would increase the village housing stock by 9.5% and due to previous decisions there is no retail provision close by. Meadow Park is on a regular bus route.

f) Other than the land owner, **no local support** has been put forward for this site and it **does not have the support of the Parish Council**.

5.5 Dean Hill Road: This site is considered to be totally **unsuitable** by the Parish Council and the local residents currently occupying Dean Hill Road – 11 properties. The following reasons are put forward in support of this view:

a) This would create a 'satellite settlement' outside of the Village Settlement Area and be totally in conflict with the current properties which are a few houses/bungalows in a country lane. This could be argued to be open countryside and housing of this proposed density would be contrary to current planning policy;

b) The land is currently used as a 'smallholding' operation which fits in well with the location;

c) The M5 motorway is in a cutting on one side and the main railway line is on the opposite side and this has led to questions of land stability. Recent works to support the railway embankment have been noted;

d) There are limited public services to the current properties – no gas, sewers or surface water drainage provision;

e) Access/Traffic problems are of extreme concern. There is limited visibility to the right as one tries to access the B3181 due to the railway bridge and road dropping away. Increased use of the junction would be of concern. The road past the current properties in the direction of Lloyd Maunder Road is a very narrow single track road with two very tight railway bridges and a tight corner around farm buildings. This road is already being used by some as a 'back way' into Two Sisters factory site and the scrap metal business;

f) If any development were to be allowed on this land it should only be of very low density in keeping with other properties in the road.

5.6 Lloyd Maunder Way (Road) This is **not considered suitable** for development for housing by the Parish Council and it is unaware of any representations/support, other than the landowner, in favour of it being so used. Parish Council are advised by some locals that they recall this site being put forward before and having been turned down by a Planning Inspector. The areas of concern, in addition to those general points listed at paragraph 5.1 above, to support the view that the site is **unsuitable for housing** development are:

a) The site is in close proximity to the M5 motorway, the main railway line to the South West and a car park and factory subject to 24 hour operation. It is considered that this would **not be** a sustainable development;

b) Road access for residents would be restricted by the unsuitability of Dean Hill Road [see paragraph 5.5e) above] in the Cullompton direction and the factory entrance in the direction to the Station Road/Halberton Road.

- c) Access to current facilities and public transport would require use of the motorway underpass footway;
- d) The development would be somewhat isolated from the main development of the village.

6. Proposed Business/employment sites within Willand Parish [Para 3.111]

6.1 **Willand Industrial Estate {Known locally as Mid Devon Business Park}**. This proposed site is accessed from Willand Parish but the majority of it is within the parish of Halberton although shown within the Willand Settlement Area. Phase 1 has been started but still has plenty of room for further development. The land allocated for Phase 2 is still green fields. Willand Parish Council has **no issues** with this being retained as a designated commercial site but raises the following points:

- a) Willand Parish Council is concerned at the slow development of this site and is concerned that its future development is being adversely affected by nearby 'farm diversification' business site development which appears to be a 'cheaper option' for users. It is also noted that the adjoining South View Industrial site at Willand has vacancies. The impact of any future development at Junction 27 gives further cause for concern;
- b) It is noted with extreme concern that current policy allows that if this site is not viably developed for commercial use it could result in application being made for even more housing which it is felt the area cannot reasonably sustain.

6.2 **Lloyd Maunder {Now Two Sisters}**: The proposal for this site to be extended goes marginally outside of the Settlement Area but at this location is not considered to adversely impact upon the village. The proposed access is an extension from provision already made onto the Halberton Road. Willand Parish Council **will support** this proposal with the following points to be considered:

- a) No development should take place which will encroach on the flood plain bearing in mind that further pressure may be put on the flood plain as the result of proposed development further up the valley;
- b) The function of the current sewage works should not be compromised;
- c) Use of the land should not aggravate current problems reported by nearby residents in relation to noise, smells or insect nuisance. The Parish Council are aware of a potential planning application for an anaerobic digester to be placed on the site to be partly fuelled by food waste from the current factory.

7. Junction 27 and Willand – S3 Option 2a {General Observations}

7.1 In plain and simple terms Willand Parish Council **do not support** any of this proposed development scheduled as **Policy J27 – Land at M5 Junction 27 and adjoining Willand**. Observations with regard to land allocated for **Commercial Development** will follow in paragraph 8. Observations with regard to land allocated for **Residential Development** will follow in paragraph 9.

7.2 Junction 27 already has difficulty coping with traffic flows and peak times of the day and certainly on Saturday mornings in the summer creating a danger by traffic backing up onto the motorway and the North Devon Link dual carriageway. It is appreciated that junction improvements and traffic lights are to be installed but it is an unknown as to whether that will cure the current problems let alone cope with the predicted vehicle

movements for the proposed developments.

7.3 Junction 27 is the main gateway for road and rail traffic into the whole of Devon and Cornwall. The whole area is marketed as a 'green and pleasant land' and 'golden sands' where the beauty of the countryside and shoreline is its main selling point. Whilst appreciating that there will be arguments as to providing screening we already have the vision of the solar panels on one side and if we have large 'sheds' on the other side what sort of image will it convey? Look at Bridgewater! Welcome to the South West through an industrial site!

7.4 If this option is adopted in full or part it is considered that it will have a negative commercial impact on nearby local towns such as Cullompton, Tiverton and Wellington with potential for affecting areas further away such as Exeter and Taunton with unknown and unproven benefit, if any, to Mid Devon District. It will work against the current policy of supporting and developing the viability of town centres. There will only be the same amount of money to be spent in the area.

7.5 There will be a loss of productive farmland with the loss of local food or bio fuel production capability. The land which is not so productive is woodland or rush grassland which soaks up rainfall and slows down surface water in reaching flood prone areas further down the valley. Some of this land floods although at a higher level and the ground water is retained rather than flowing quickly down the valley. If the large area is 'concreted' over there is the potential to lose this natural barrier. Willand and Cullompton will potentially be adversely affected. Other potential and current flooding issues are yet to be addressed.

7.6 Considerable wildlife habitat will be lost. There is a small herd of deer that use the land. Water birds use the natural ponds and watercourses and the local shoot attracts and supports diverse birdlife and other wildlife. A full and detailed wildlife survey needs to be in place and available before even an outline plan is considered for approval.

7.7 The Developer has indicated intended road improvements to the A38 between Junction 27 and Waterloo Cross. Entrance to both **Commercial** sites will be from a single roundabout on this proposed newly duelled A38 road. No thought or provision had been given to the potential affect on the B3181 as yet – see paragraph 1.2 above. By encouraging all this traffic to come to the area – parking for 4,500 cars alone – it is difficult to see how **Policy J27f)** will be relevant or achievable.

7.8 It is noted that the housing element is being separated from the commercial elements of the consultation in current considerations but it must be recognised that the original paperwork for application – which has not been amended – still refers to the whole site and includes the housing element. Enquiries to pursue this issue after recent presentations by the developers have resulted in an inconclusive 'political' reply.

7.9 It is appreciated that under Policy J27h) a public Masterplanning exercise will need to be undertaken but indications are that further applications in relation to this site will appear prior to the later stages of the preparation of the final Local Plan.

7.10 There is a justified concern that an outline approval will be achieved for the site and then it will be followed by a 'dumbing down' as the result of amendments and viability arguments.

7.11 Land 'availability' is an issue and although the refusal to participate by a landowner has been described as being 'an insignificant small package of land' if one looks at the position of that land it could be very significant – not necessarily by its size but the fact that it divides a section of the proposed development.

7.12 The proposal is a 'ribbon' development that cannot be called a new town but is in 'open countryside'. It stretches for 1.8 miles along the B3181 and is about 2 miles diagonally across. It is spread over three parishes and is considered by those who have made their views known in Willand as a totally unsuitable development and has no known support. One resident has welcomed an increase in employment opportunity. No justification can be found for the projection of 3,000 to 4,000 jobs being created. How many would remain once the development is completed?

8. The proposed Business/retail/leisure facility at J27

8.1 It is noted that part of this element [**Policy J27 b) 1).**] of the consultation could well be delivered earlier than the suggested period. Some of the elements on the land to the North of the A38 are already subject to planning permissions. Willand Parish Council objected to applications at the time and is likely to continue to do so with the current information available. The following points are also submitted for consideration:

- a) Reasons for objection/concern as outlined in paragraphs 7.2, 7.3, and some of 7.5, 7.6 and 7.7 also apply;
- b) No information as to the number of lorry and other vehicle movements has been forthcoming during presentations or since. This prevents judgements on potential 'traffic' impact;
- c) There is spare capacity on industrial/employment land sites within Willand and on farm diversification land close to the Willand Parish boundary in Halberton Parish. These could be even more adversely affected by additional such sites close by.
- d) It is appreciated that argument will be made that the proposed developments will be different and cater for larger distributors and different types of business but these explanations are not supported by detail at present. Do we want a 'Bridgwater' at Junction 27?

8.2 The area of **Policy J27 b) 2) to 10)** inclusive lacks detail and questions are raised as to its viability. Different answers were given by the potential developers at different locations of presentations. The following points are offered to support these views:

- a) In November 2013 a press release was issued by MDDC where the Leader was quoted enthusiastically FOR the development and one of the 'attractions' was to be a "Prestige Automotive Development". There is no sign of this development in the Options Consultation!
- b) **b) 2)** refers to an outdoor leisure destination. All the information we have to date is that 'it will be exciting and possibly water based'. Visitor attractions which already exist in the area do not report overwhelming support.
- c) **b) 3) & 4)** refers to a designer outlet/village & Devon produce promoting centre – will this not have a negative impact on our existing town centres and similar facilities within

reasonable travelling distance?

d) **b) 5)** refers to sport and activity centre with retail. There are such areas already available within acceptable driving distance and with lack of further detail a comparison is difficult.

e) **b) 6)** refers to a plant/horticultural centre. Is this needed or viable when there is already a large expanding garden centre at Waterloo Cross and another at Leonard Moor Cross – both have cafes/tea rooms?

f) **b) 7)** refers to a cinema. Willand Parish Council was advised by the developer that at present no operator had been found.

g) **b) 8)** refers to a motorway service area etc. Such a facility already exists on site but mainly for car occupants. No figures could be given at the presentation, or since, as to how many lorry and coach parking spaces would be provided. There are already large motorway service areas at Taunton Deane and Exeter and a good facility at J28 Cullompton. Is there a justification for more in such close proximity?

h) **b) 9)** refers to a hotel, conference venue and concert hall. There is already a 'hotel' on site. Further hotels are available at Taunton, Exeter and Tiverton and all have conference facilities. Is there a justification for more? Is there a need for a concert hall at this somewhat remote location when similar facilities at Exeter and Taunton and further afield are experiencing difficulties?

8.3 Without a lot more information accompanied by professional needs and viability assessments for the proposals there is a danger of enthusiasm for 'something spectacular' at Junction 27 to leave the area with a potential white elephant and/or further devastation of our local town centres.

9. Policy S3 Option 2a – New settlement between Willand and Junction 27.

9.1 This option has **no known support** within Willand Parish and **considerable opposition**. It is appreciated that at this stage there is no detail other than a potential for 3,000 dwellings with 35% affordable housing. It is appreciated that infrastructure and availability of provision will all have to be dealt with via a public Masterplanning exercise.

9.2 This is a 'ribbon' development spread over a narrow area of at least 1.1 miles between the B3181 and the M5 motorway. It is difficult to envisage a viable central focal point for a community particularly as it is seen as an extension of Willand to which it will become attached.

9.3 It is known that Cullompton Town Council is in favour of Option 2b which would see a new development to the East of the town. There has been dialogue between the two Councils and Willand fully support the Cullompton Town Council position. Their view regarding provision of employment land near to where people live is also supported.

9.4 The perceived traffic difficulties surrounding Junction 28 and Cullompton are noted as are the indications in the Options Consultation to appear to steer a decision towards Junction 27 development. The cost implications and the need to recover them from the development should not be a reason for a bad decision to put a major development where it is not wanted or needed when another location can justify expansion.

9.5 S3 Option 1 is the preferred option of Willand Parish.

10. Conclusion

10.1 The position of Willand Parish Council has been taken from their own knowledge and observations together with local feedback as the result of consultation with parishioners. The Parish Council will readily expand on any points if required.

10.2 Recommendations and observations are contained under each listed heading and cross referenced as necessary.

APPENDIX 'B'



WILLAND PARISH COUNCIL

**Response to Local Plan Review 2013 - 2033
Proposed Submission
February 2015**

1. Preamble.

11 Willand Parish Council made a very comprehensive submission in March 2014 and the content of that document is still very relevant in many areas. It is attached as an appendix to this document and will be referred to as appropriate in this current submission.

12 Some circumstances in the original response have changed or need amending as follows:

- i. Paragraph 1.6 c) A report commissioned by Mid Devon District Council recognises that Willand has a shortfall of 64% of green open public space. This having been recorded there is now a wish to close down 33% of the children's play areas.
- ii. Paragraph 1.6 f) The Primary School has been 'reclassified' so that it now has some spare classroom space. It is badly lacking in appropriate school hall facilities for the size which causes children to eat meals in classrooms and the hall is not large enough for school assemblies and other activities. This shortfall requires the use of the village hall which is also 'undersized' for the community.
- iii. Paragraph 1.6 l) Actual doctor surgery opening times and available staff has been further reduced forcing residents, many very elderly, to travel to Cullompton.
- iv. Paragraph 1.6 m) The provision of retail outlets may improve as there is a planning application being considered for a small Co-op on the edge of the village on the Mid Devon Business Park [Willand Industrial Site].

13 The consultation process for the public was closed in March 2014 but that does not appear to have applied to certain developers and landowners, particularly in relation to the original proposals around Junction 27. They have continued to hold meetings with Planning Officers and provide briefings to Councillors. Records of such meetings and briefings are not in the public domain. Press briefings have continued.

- i. Paragraph 2.3 The 'confused' position still remains – if anything worse – due to bold statements and little or no substance when questioned.

- ii. Paragraph 2.7 Since submission of the March 2014 response a pressure group – Willand Against Village Expansion [WAVE] has been formed by residents and a petition containing signatures of approximately 50% of eligible voters in the village has been completed and presented to MDDC. This petition is against any expansion within the village as outlined in the consultation document. It also objects to an development at Junction 27 or the 'ribbon' development of housing from that area to Willand.

14 Section 4 of the March 2014 response could be confusing as the current 'Proposed Submission' document has renumbered the policies and the paragraphs. The main comment and concerns are still relevant.

15 Section 6 of the March 2014 response in relation to employment land will be dealt with later under the specific proposals but there is an attempt to obtain outline planning permission to put 97 houses on this site. The South view Industrial site has seen resurgence in the last year and is now almost fully occupied with planning applications being made for expansion of some premises. A nearby small business site, which the owners tried to close and substitute housing, has now been fully let for business use. The site referred to in Paragraph 6.2 is now the subject of a planning application which is nearing determination.

16 Works referred to in Paragraph 7.2 of the March 2014 response are taking place but these are only to cater for current problems and will not cater for any proposed or wished for development at Junction 27. Depending on which version one hears there are between 3,000 and 4,000 jobs on offer if Junction 27 development is allowed. It is understood that the unemployment figure for the whole of MDDC area is about 600 and so workers would have to commute in. What would that achieve for air quality or carbon footprint?

LOCAL PLAN REVIEW 2013 – 2033 - PROPOSED SUBMISSION - FEBRUARY 2015

2. Introduction

21 Willand is recognised as a village and has had expansion and development placed upon it in the past which has not been of benefit to the local community or promoted community well-being. The provisions of paragraph 1.15 are supported.

22 The comment in paragraph 1.16 as to the new settlement in the vicinity of Willand being inappropriate and likely to be unachievable is strongly supported. There is empathy with a number of other comments in the paragraph.

23 The change of policy on page 19 in relation to AL/WI/1 and AL/WI/2 are noted but there are concerns as to the allocation of WI1 Land East of the M5 which will be dealt with later.

3. Development Strategy and Strategic Policies

31 The comments in paragraph 2.4 in relation to windfall developments is recognised and understood but is of concern as written without further safeguards. Currently, if a particular 'windfall' site is approved Willand could be subjected to a number of houses being

built which would result in three times more than the planned number under the proposed local plan. This potential problem needs safeguards writing into the policy.

32 It is felt a minor amendment needs to be made to the last line of Paragraph 2.15 where 2.13 should in fact be 2.12.

33 It is considered that Policy S1 should contain a provision for the retention and protection of certain agricultural land which is used for food production and/or production of crops to support green energy through bio digesters.

34 The retention of employment allocations at Willand as set out in paragraph 2.5 and 2.47 is supported.

35 Policy S5 – should the third word of the first line be ‘towns’ as opposed to ‘parishes’?

36 Policy S5 – The provisions of the policy explanation in paragraph 2.36 is of concern as to its practical application. Such spaces provided would not be ‘public open space’ as a management company would not want, or even ‘allow’ a resident from off the site to come and wear out the equipment that they were having to pay to maintain. How would it be if such an open space or play area was the nearest to another development where an ‘offsite’ contribution were allowed as regard to having to provide a facility on their site?

37 Policy S11 – This policy is fully supported as it will place growth in an established town area. It will also allow the provision of the entire additional infrastructure which can be achieved around such a substantial development.

38 Policy S13 – The majority of this policy is supported BUT there are concerns as to part of paragraph 2.79 which deals with contributions to ‘offsite’ development. If affordable housing is needed in Willand but a developer feels that it is not viable to provide it on his site how will this help affordable housing provision in Willand if the houses are provided elsewhere?

4. Site Allocations

4.1 Rural Areas – In the table at paragraph 3.186 it is noted that Willand has been allocated the largest number of houses yet Willand has the smallest land area of all of the villages. It is felt that this is disproportionate when it has been recognised that Willand has already been overdeveloped over past years without adequate provision of suitable and proportionate infrastructure. The commercial development for Willand as outlined in the table in paragraph 3.189 is supported.

42 Policy WI1 is only part of the site initially offered. At a) it refers to 42 dwellings yet this is in conflict with the 40 shown in the table 6 at paragraph 2.4 on page 26 and table 22 at paragraph 3.186 on page 121.

43 Our original submission in relation to this site is contained in paragraph 5.4 of the appendix attached. That view as to it being an unsuitable site for the reasons given is still maintained.

44 Policy WI2 - This policy is supported and is smaller in area than the current policy allocation. The development of Hiscocks Farm into an industrial site as the result of farm diversification policy and the lack of proper planning enforcement of unauthorised development on the site in the past has taken some employment opportunities out of the village into the countryside.

5. Managing Development

51 The policies in this section are suitable and should not be allowed to be made less effective by developer amendment. Observation and comment on specifics follow.

52 Minor amendments may be requires as follows:

DM13 f) – word 11 should be NOT;

DM14 – line 2 – should Bampton be removed as it is no longer a town?

DM15 – line 1 - should Bampton be removed as it is no longer a town?

53 DM19 needs to be strengthened with the period at b) being returned to 5 years or at least 3 years. The short term is open to abuse and manipulation of facts as has been evidenced on two occasions within Willand in the past couple of years.

6. Policies Map – Willand

61 The removal of the main current 'exception sites' is supported and the reasons understood.

62 The objection and concerns as to the inclusion of site WI1 are set out in section 4 above.

63 The retention of site WI2 for Commercial Allocation is supported and a strong argument should be made for it to be retained for that purpose and not allocated for housing as sought by the landowner in a current outline application. It is felt that the proposed deletion of the rest of the site of Phase 1 of the Mid Devon Business Park is premature as it has not been fully developed as yet. The whole of Phase 1 should be retained as one Commercial Allocation Site.

64 The removal of Phase 2 of this site is understood as is the adjustment to the Willand Settlement Area boundary by way of reduction in size. It is understood that the current owner of that land may seek to use all or part of it for the relocation and expansion of his current business and Willand Parish Council have no strong feelings as to such an application. There is still a 'boundary issue' with this site as part of it is still in Halberton Parish and it would make sense to initiate a boundary change to take account of this.

7. Junction 27

7.1 The omission of any commercial, retail or leisure facilities at Junction 27 from the plan is fully supported for reasons outlined in sections 7 and 8 of the Appendix attached. We also fully understand the reasons for non inclusion which have been explained by officers in relation to housing and cooperation with other areas. A sustainable and creditable case has not been made for this to be included – or subsequently entered into – the plan.

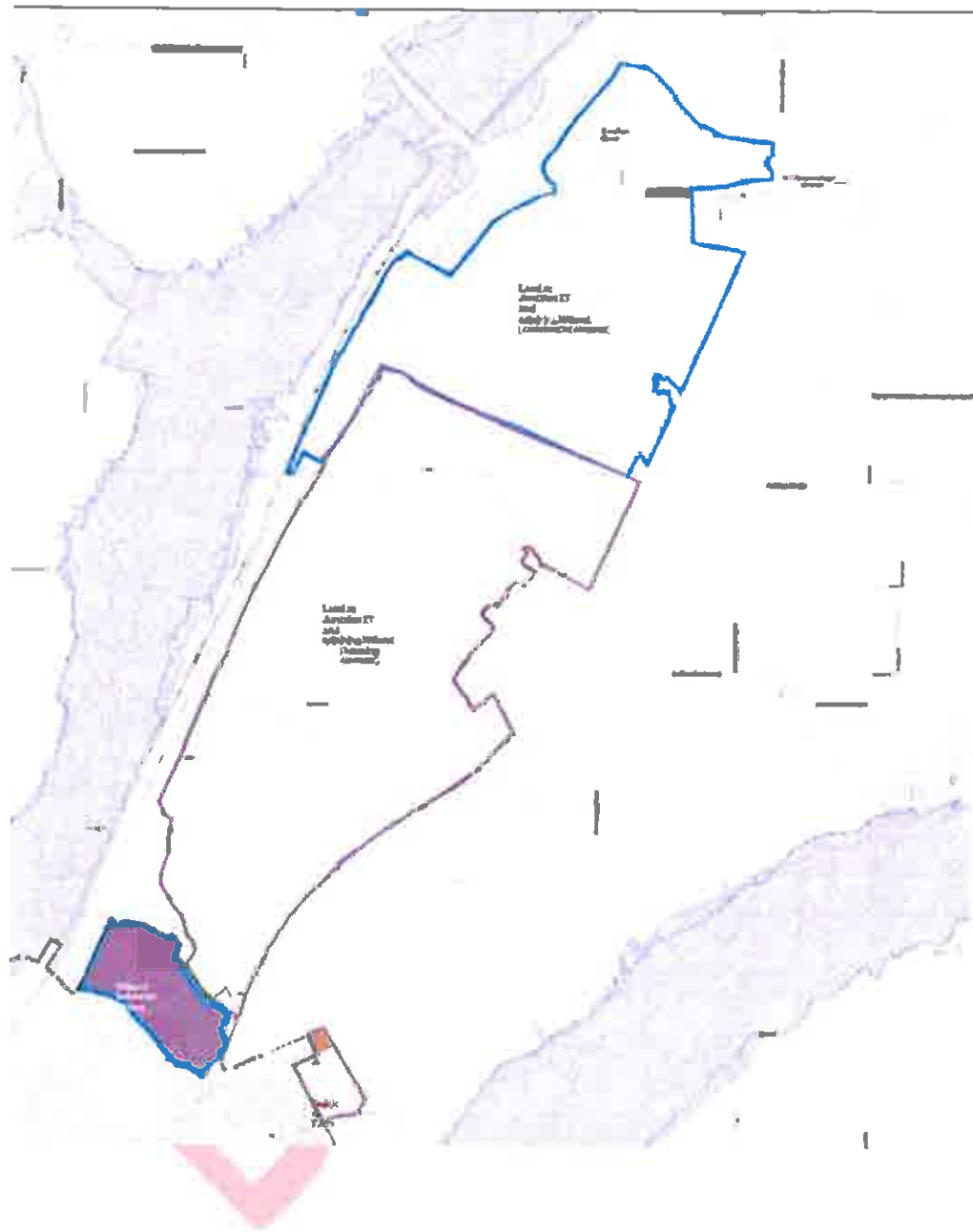
7.2 We totally support the omission of any plan for housing between Willand and Junction 27. It should not be considered for entry into the plan. We fully support the proposals in relation to the proposed expansion of Cullompton for the reasons given.

8. Conclusion

8.1 We ask that the views of our community be listened to and respected in relation to all of the points of view and amendments suggested in this response.

8.2 Considerable thought and hard work has been contributed to the preparation of this plan. We would be opposed to its alteration and amendment in any major way to meet the self interest of any particular group, company or individual.

APPENDIX 'C'



END