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From: Local Plan Review
Subject: FW: Devon County Council's Strategic Response - Mid Devon Local Plan Review Proposed Submission (incorporating proposed modifications) Consultation
Attachments: 170213_DCC strategic application response_MD_LP_Review_Submitted_14022017.pdf

From: Barnaby Grubb [Redacted]
Sent: 14 February 2017 10:20
To: Local Plan Review
Cc: Councillor Andrew Leadbetter; George Marshall; Joe Keech; Dave Black; Ian Sorenson; Stuart Jarvis; Sarah Ratnage; Doug Eltham; Brian Hensley
Subject: Devon County Council's Strategic Response - Mid Devon Local Plan Review Proposed Submission (incorporating proposed modifications) Consultation

Good Morning,

Please find attached a copy of our formal response to your Local Plan Review Proposed Submission (incorporating proposed modifications) Consultation.

Kind regards,

Barney Grubb
Senior Planning Officer
Development Management
Planning, Transportation and Environment Directorate
Email: [Redacted]
Telephone: [Redacted]

139/J27/mod
139/GV
139/CU21/mod
139/SP2/mod
139/S11
139/S12/mod
139/TIV1-TIV5
139/UF2/mod
139/CU1-CU6/mod
139/CPRES/mod
139/MAP
139/CU7-CU2/mod



Planning, Transportation and Environment

County Hall
Topsham Road
Exeter
EX2 4QD

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

Tel: [REDACTED]
Email: [REDACTED]
Fax: [REDACTED]

14 February 2017

Sent by email to [REDACTED]

Dear Mr Welsh,

RE – Local Plan Review Proposed Submission (incorporating proposed modifications) Consultation

Thank you for the opportunity to comment on the Local Plan Review Proposed Submission (incorporating proposed modifications) Consultation. Devon County Council has worked closely with Mid Devon District Council in developing the plan to this stage, having responded to previous consultations and providing evidence about community facility enhancements and transport improvements which will support the plan.

Two of the principal modifications to the Plan are the inclusion of an additional, strategic allocation on land at Junction 27 of the M5 and some further residential development at Cullompton, Tiverton, Crediton and distributed in the rural areas.

In terms of the proposed development at Junction 27, the County Council recognises the strategic relationship with the motorway junction itself and would stress the importance of maintaining the functionality of the junction in terms of its wider sub-regional role. Significant development at this location can only be accommodated if it can be demonstrated that the junction operates efficiently throughout the year. Substantial upgrades will be required.

In terms of the additional residential development proposed in various locations across the District, comments in this response set out the required measures required to mitigate the development proposals.

The County Council believes that there are some areas where the plan could be improved to provide greater clarification and reflect the latest evidence bases. In particular, the key areas which we have provided comments on include:

- Local transport provision;
- Local education provision (including early years);
- Minerals planning;
- Health and wellbeing;

- Historic environment; and
- Environment and sustainability.

This response is separated into sections relating to each of the subject areas set out above and whilst we acknowledge the presence of the Culm Garden Village proposal, comments are not specifically provided in this response given that the full extent of the Garden Village is not included in the Plan. However, as the status of the Culm Garden Village proposal progresses, we will most likely need to reconsider elements of strategic infrastructure provision, particularly relating to transport and education.

Local transport provision

Junction 27 of the M5 is a strategic location not just for the District but for the wider sub-region. Recent improvements have taken place to ensure the junction operates throughout the year, even in peak times. However, it is close to capacity during peak periods. Significant development at this location can only be accommodated if it can be demonstrated that the junction operates efficiently throughout the year, due to its strategic role. The junction is capable of being improved but substantial upgrades will be required to accommodate the anticipated traffic associated with the Local Plan strategic allocation at Junction 27. Devon County Council are currently working on further feasibility and assessment work with the developers and promoters of the Junction 27 development.

In terms of more detailed comments, we suggest the policy wording for Policy CU21 (b), Page 115) reflects the need to include a Junction 28 mitigation clause as per NW Cullompton and East Cullompton which is picked up in paragraph 3.149 on page 116. This states that 'Any application for development must undertake an assessment of the impact of the proposal on both the capacity of the local road network and Junction 28 of the M5 and permission will only be granted where there are no significant adverse impacts which cannot be mitigated.'

With regard to Policy SP2 (b, Page 146) we would advise that the slip road improvements at the Sampford Peverell junction, A361, have been removed from the North Devon Link Road project and it is unlikely that the Junction 27 development site will provide a contribution towards these. As a result the policy wording which states that the site will '*come forward following the commencement of development of the M5 Junction 27 allocation*' would seem unreasonable.

This development will also increase pedestrian demand towards the town centre, and its related attractions and facilities, and appropriate contributions towards improvements to the routes for safe pedestrian access will be sought through the development management process.

Local education provision (including early years)

The Local Plan Proposed Submission identifies a number of school proposals which will support development. It is important to ensure that school expansion and new schools are provided as required to meet the needs arising from development as it comes forward.

The modifications to the Local Plan include additional residential development at Tiverton, Cullompton, Crediton and the rural areas. New primary schools are proposed at Tiverton, Cullompton and Crediton and there is expected to be sufficient capacity to accommodate the additional development in the plan. Within the 'rural' areas, the largest developments proposed are developments of 60 dwellings at Uffculme and 60 dwellings at Sampford

Peverell. An expansion of Uffculme Primary School will be necessary to accommodate the development proposed as the school is currently forecast to be at capacity, and this is included in the Infrastructure Plan. Sampford Peverell Primary School is forecast to have sufficient capacity to accommodate the development proposed.

Expansions of secondary provision at Cullompton, Tiverton and Uffculme have also been identified in the Infrastructure Plan and will need to provide capacity for the additional development proposed.

It is noted that the Local Plan Proposed Submission does not include the full Garden Village proposal. This will impact on the education strategy for the town of Cullompton and require both multiple primaries and a secondary provision. It is anticipated that the Garden Village would require primary schools providing 1,260 places which could be delivered in a combination of scenarios and a secondary school, or secondary provision as part of an all-through school. This is expected to be for 750 places. The comments below are based on the development strategy included in the Local Plan Proposed Submission, but there is likely to be a need to amend this for Cullompton if the Garden Village proposal comes forward.

Cullompton

A new school is proposed at NW Cullompton, which is necessary to support the development proposed in the town. Whilst Policy CU6 – North West Cullompton Phasing reiterates the details as set out in the approved Adopted Masterplan Supplementary Planning Document, with regard to identifying that the land should be provided with rights of access prior to the commencement of development, it does not include the trigger by which services to the school site are provided prior to the occupation of no more than 50 dwellings on the Persimmon land control parcel, or within 18 months of the commencement of the development, whichever is the sooner, and we would recommend that this be included for the sake of clarity.

Additional secondary capacity will also be required and it is noted that an area of land is safeguarded for the expansion of secondary provision. There is not sufficient development proposed, without the Garden Village, for a new secondary school, but as identified above, it is expected that additional secondary provision will be needed at East Cullompton if the Garden Village comes forward. The land identified is still expected to be required to provide additional secondary capacity to support development in the existing town to the west of the M5 together with the Garden Village secondary provision. The County Council expects the freehold of the land to be available for £1 to support the development proposed.

Crediton

Policy CRE5 – Pedlerspool identifies a school site, with timings for the transfer and servicing to be negotiated. The County Council would consider it appropriate for the site to be offered at the reserved matters stage, which would enable the school to be delivered in line with development.

Minerals planning

The illustration of Mineral Consultation Areas on the Policies Map is welcomed. However, MDDC should be advised that, upon anticipated adoption of the Devon Minerals Plan in February 2017, a new set of Mineral Consultation Area boundaries (more extensive than

the existing Areas) will be published and will subsequently need to be included in Mid Devon's Policies Map.

Health and wellbeing

No further comments

Historic Environment

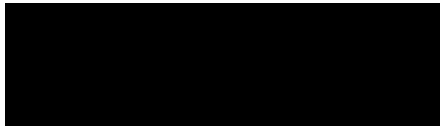
No further comments

Environment and sustainability

There are modifications proposed in relation to Policy CU3 (paragraph 3.81, page 92) and Policy CU9 (paragraph 3.107, page 101) which state that 'The role of landscaping and tree-planting in flood prevention and carbon reduction should also be recognised in the development'. However, a review of carbon storage undertaken by Natural England has identified that woodland of the style managed for a nature reserve sequesters about 6 tonnes of CO2 per hectare per annum. Therefore, the effect of tree planting at mitigating emissions from new housing is negligible unless it is anticipated that many hectares of land are to be turned over to new woodland.

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

Yours sincerely,



Joe Keech

Chief Planner