

5825/S3/mod  
5825/SP2/mod  
5825/J27/mod

5825/S2/mod  
5825/S6/mod  
5825/S7/mod

5825/TV16/mod  
5825/S10

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**From:** Local Plan Review  
**Subject:** FW: Local Plan Review submission  
**Attachments:** Local plan submission from Sustainable Villages.doc

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**From:** Sally Chapman [REDACTED]  
**Sent:** 09 February 2017 14:22  
**To:** Local Plan Review  
**Subject:** Local Plan Review submission

Dear Sir / Madam,  
Please find submission from Sampford Peverell and District Sustainable Villages.  
If clarification is required please let me know,  
Many thanks,  
Sally Chapman,  
Chair

Local Plan Review Submission from Sampford Peverell and District Sustainable Villages

<http://sampfordpeverellanddistrictsustainablevillages.btck.co.uk/>

This response was prepared by Sally Chapman, Chair of the above-named Community Organisation.

Address : 3 Lower Town, Halberton, Tiverton, EX16 7AU.

Email: [REDACTED]

The responses were ratified by 11 members of the committee at our recent meeting on Wednesday 8<sup>th</sup> February.

The following responses are made in relation to soundness and not legal compliance.

1. Housing Policy S3 2.26 – 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. An additional allocation of housing above the SHMA has been made to make allowances for J27 from 359 - 381 to 393 which gives an extra 12 houses to accommodate workers of J27. It is not clear how the proposed development of 60 units at Sampford Peverell links into this provision. This is inadequate and will therefore put pressure on local housing stock.
2. Policy SP2 Higher Town Sampford Peverell. There is no comment on the impact of the proposed development on local services such as the local school and shops and what additional infrastructure should be expected by any developer. There needs to be a higher level of affordable housing to meet the needs of the J27 workforce.
3. Policy S6 Employment / Policy S2 Amount and distribution of development- 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. I imagine that the control of retail development will be to restrict competition with retail and services that are provided within the towns. Please can you add some detail about controls ethical trading practices of these business that they should meet Agenda 2030 UN Sustainable Development Goals in relation to our responsibilities to ensure supply chains use ethical employment practices and ethical resource procurement practices.
4. Town Centre - Policy S7 2.48 '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. Regional retail floorspace is not required at this location as high quality shopping outlets are available in Exeter closeby and it is important to maintain the rural character of the area as the

gateway to Devon which is greatly valued for its diverse natural surroundings. There are not sufficient high income earners in Mid Devon to warrant the type of retail outlet proposed. Profits from these outlets will not go to shareholders not into the local community. Town centres in Mid Devon are in need of regeneration. Out of town shopping will inevitably impact on local town centres.

5. Policy Tiv 16 Blundells Schoole) Provision and enhancement of cycle and pedestrian links in the area. Cycle and pedestrian paths should connect up to proposed housing developments to the north of Blundells Road along the River Lowman. The provision of a bridge over the River Lowman should be included.
6. Tiverton T10. There is not a section about 'Carbon Reduction and Air Quality' and corresponding commitment to achieve zero carbon housing by 2016 in relation to developments in Tiverton. This section only seem to relate to the North West and Eastern developments in Cullompton. This needs to apply to Tiverton aswell.
7. Land at Junction 27 Policy J27. Devon predominantly a rural farming community is renowned for its natural beauty, outdoor leisure activities such as walking hiking surfing sailing at its coasts and national parks and local artists, crafts, cottage industry and traditional produce. A 'Gateway to Devon' showcasing what Devon has to offer would certainly enhance what Devon has to offer and would be a positive thing for tourism. Indeed the Agronomy Centre if well researched appropriate and authentic would also promote local businesses and develop the local economy. In order to achieve this local businesses would need to be involved from its inception.  
Outdoor Adventure Zone (6ha) – Surf lake/lagoon; beach; high ropes adventure area. With surf beaches an hour away the location of a surf lake / lagoon here seems absurd and does not justify the destruction of a natural landscape for its construction. There are extensive beaches in North Devon for young people to learn to surf. It is part of the surfing experience to go out into the waves in natural elements. Visitors come to Devon to enjoy its natural environment and so this facility is not needed here it is merely profit-making exercise. There is a Go Ape leisure facility at Haldon Hill which is very sensitively located in a natural woodland area and has not destroyed any of its natural environment and helps to educate children about woodland. Is there sufficient space and natural environment to locate one here?  
Outlet Shopping Village (6ha) - Designer outlet shopping centre retailing controlled goods comprising discontinued/end-of-range lines, seconds and surplus/sample stock. There is no need for a facility such as this at Junction 27. Visitors coming from the north and south will have shopping facilities in Bristol and Exeter. It will have a negative impact on Exeter's retail outlets. This area is not suitable for this kind of development it is not near large urban area therefore visitors will be seasonal during holiday times. Therefore much of the employment will be seasonal part-time minimum wage zero hour contracts and will provide limited permanent full-time positions. There will

inevitably be competition with some town centre businesses it will be impossible to avoid this. *There is a clear synergy between the Designer Outlet Village proposal and the tourism and leisure aspects of the proposed allocation*. There is a clear conflict with the sort of small businesses and producers who will be selling locally made produce in the Agronomy Centre. This will conflict with the cheap end of line goods on sale in the retail outlets. We want visitors to be spending their money on local goods rather than goods made in China. Many 'designer outlets' have poor ethical trading standards regarding employment rights and environmental damage. We need to act locally and think globally and comply with the Agenda 2030 UN Sustainable Development Goals on decent work and economic growth, Sustainable Cities and Communities

## Local Plan Review Proposed Submission (incorporating proposed modifications)

#48

INCOMPLETE



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## PAGE 2: Part A

## Q1: Personal Details\*

Title	Miss
First Name	Sally
Last Name	Chapman
Job Title (where relevant)	Chair
Organisation (where relevant)	Sampford Peverell and District Sustainable Villages
Address 1	3 Lower Town
Line 2	Halberton
Line 3	Tiverton
Line 4	Devon
Post Code	EX167AU
Telephone	[REDACTED]
E-mail address	[REDACTED]

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## Q2: Agent Details (if applicable)

*Respondent skipped this question*

## PAGE 4: Part B - Please use a separate sheet for each representation

## Q3: Name or organisation:

Sampford Peverell and district Sustainable Villages

**Q4: To which part of the Local Plan Review does this representation relate? Please note that consultation invites comments on proposed modifications only, and not the wider unchanged content of the Local Plan Review.**

Paragraph	2.26
Policy	Housing Policy S3

Local Plan Review Proposed Submission (incorporating proposed modifications)

**Q5: Do you consider the Local Plan Review to be\*:**

Legally compliant	Yes
Positively prepared	No
Justified	No
Effective	No
Consistent with national policy	Yes

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**Q6: If you consider the Local Plan Review is not legally compliant or is unsound please explain why below. If you wish to support the legal compliance or soundness of the Local Plan Review, please also use this box to set out your comments. Please be as precise as possible.**

An additional allocation of housing above the SHMA has been made to make allowances for J27 from 359 - 381 to 393 which is giving an extra 12 houses to accommodate workers of J27. This is inadequate and will therefore put pressure on local housing stock. It is not clear how the proposed development of 60 units at Sampford Peverell links into this provision

**Q7: Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound. Please state why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward revised wording of any policy or text. Please be as precise as possible.**

The Eden Westwood proposal estimates over 1,000 FTE jobs. It does not seem that there is sufficient housing provision planned.

**Q8: Do you consider the Local Plan Review to be compliant with the duty to co-operate?**

Yes

**Q9: If you consider that the Local Plan Review fails to comply with the duty to co-operate, please explain why below. If you wish to support its compliance with the duty to co-operate, please also use this box to set out your comments. Please be as precise as possible.**

*Respondent skipped this question*

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**Q10: If your representation is seeking a change, do you consider it necessary to speak at the examination hearings?**

*Respondent skipped this question*

**Q11: If you wish to speak at the hearings, please outline why you consider this to be necessary:**

*Respondent skipped this question*

**Q12: Please indicate whether you wish to be notified of:**

*Respondent skipped this question*

**Q13: Signature**

*Respondent skipped this question*