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Standing Up For Our Devon Countryside

www.cpredevon.org.uk

Registered Charity No:245317

PO Box 26, Beaworthy, EX21 5XN Tel: [REDACTED]
Mid Devon District: Popes, Shillingford, Tiverton EX16 9BP
[REDACTED]

6 February 2017.

6212/SP2/mod
6212/DM2/mod
6212/S3

Mid-Devon District Council
Phoenix House
Phoenix Lane
Tiverton
Devon EX16 6PP

For the attention of Mrs J Clifford, Head of Planning & Regeneration.

Dear Madam

Mid-Devon Local Plan 2013 – 2033

CPRE Devon, Mid Devon District wish to make the following comments and recommend the following amendments to the proposed Mid-Devon Local Plan 2013 – 2033, for which public consultation ends on 14 February 2017.

Preparation of the Plan

Paragraph 1.6 states: "The NPPF requires local planning authorities to base local plans on adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects of the area". There is no reference to demographic shifts or population change statistics in the Plan to justify the large numbers of houses proposed to be built in Mid-Devon during the Plan period. We request that MDDC insert a paragraph to justify these proposed housing and commercial developments.

Paragraph 1.7 states "Most importantly, the NPPF applies a presumption in favour of sustainable development" and goes on to say "specific policies in the NPPF indicate development should be restricted" with examples of SSSI, AONB, heritage sites and flood risk areas. However, it makes no mention of the NPPF brownfield first policy which states in NPPF Para 111 "Planning policies and decisions should encourage the effective use of land by reusing land that has been previously developed, provided it is not of high environmental value." We request that MDDC insert a clause which specifically states that brownfield land will be considered first for all developments, particularly in the case of windfall sites which may become available during the Plan period. CPRE are well aware of the building industries preference for building on Greenfield sites and that some brownfield sites may require land remediation measures and financial incentives. CPRE has recently published a report, which was passed to MDDC, indicating that there is sufficient brownfield land throughout the country to provide all the housing needs.

Paragraphs 1.10 & 1.11.

We are pleased that MDDC have included these two paragraphs which together indicate a desire to protect the environment of Mid Devon under national and EU regulations. However, we are concerned that the Plan does not state or seek to protect valuable agricultural land as per NPPF Para 112 which states " Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land." We are aware that you have tried to use poorer quality agricultural land for some of your developments, particularly to the east of Cullompton. We request that you amend the Plan to state clearly that MDDC intends to protect valuable agricultural land which is the foundation of the economy of Mid Devon.

Spatial Strategy

Overall Strategy

We support the five strategic intentions but request two additions, namely:

- Make best use of existing previously developed land – brownfield sites
- Support best use of agricultural land for local and national food production

Junction 27, M5 Motorway

We object fundamentally to the development of this 71 hectare parcel of land which is mainly agricultural land with a small parcel of brownfield land, namely the hotel and services area. We can see no justification for this proposed "Eden Westwood" development on the following grounds:

- The creation of leisure facilities at this Junction 27 will detract from the existing Devon attractions and businesses inland, at Exmoor, Dartmoor and the Devon coasts.
- The development will severely damage the commercial activities in Tiverton, Cullompton, Crediton and the bigger towns of Taunton and Exeter. CPRE has experience of similar developments in North Cheshire (Trafford Centre) and Kent which negatively impacted nearby towns for many years.
- In 2009, a smaller application for a food park on 8 hectares was refused as it was not sustainable and not adjacent to a major settlement.

Sustainable Development Principles

We welcome the inclusion of NPPF paras 7, 8 & 9 but voice our concern that best use of existing previously used land is not mentioned.

Overall provision of housing and employment

Housing

While the Plan refers to the evidence for housing numbers in the 2015 SHMA for the Exeter Housing Market Area, the 2013 Employment Land Review, the 2012 Retail Study, there is no justification of the actual housing numbers proposed in the MDDC Local Plan itself, no demographic shifts or population growth figures. We note that all of the housing numbers shown in this section have been increased since the 2014 draft Plan without explanation. We request that MDDC amend this section to justify clearly the reasons for the large numbers of dwelling houses proposed. Para 2.4 states a buffer of an additional 10% of houses in the numbers quoted but also mentions anticipated windfall developments.

Policy S1 Sustainable Development Priorities.

We are pleased that MDDC have included mention of ensuring the vitality of the market towns of Tiverton, Crediton and Cullompton but we are not convinced that you will be able to control the retail activities proposed at M5 Junction 27 to ensure as you state "a diverse retail offer at Tiverton, Crediton and Cullompton, through controls at Junction 27 retail—".

Market Town Policies

We have noted the following town policies but they show a limited concern for retention of quality agricultural land and best use of existing brown field sites.

- Tiverton Policy S10 mentions retention of green setting and constraints due to the hilly topography of the area but goes on to propose up to 1830 houses on Greenfield, agricultural land in the Eastern Urban Extension plan.
- Cullompton Policy S11 proposes 3,930 dwellings largely on the poorer grade agricultural land to the east of the M5 Junction 28
- We welcome and support the proposals of 28% - 35% for affordable housing and trust that this policy will be enforced with developers and contractors.
- Crediton Policy S12 proposes 786 - 935 houses constrained by the topography.
- Rural Policy S13 and Countryside Policy S14 mention developments proposed in the main villages but do not emphasise a brownfield first policy as per NPPF.
- CPRE Mid Devon District objects strongly to the M5 Junction 27 proposed 71 ha leisure and retail development on agricultural land which will impact severely on the retail activities of Tiverton, Cullompton, Crediton as well as the shopping centres in Taunton and Exeter
- The Local Plan policy intention of mitigating the impact of the proposed retail outlet and leisure activities is weak. The J27 Policy makes no mention of the current land use or the type and quality of this 71 ha parcel of land. We recommend that the type of land proposed for Junction 27 is clearly stated
- We object strongly to the intention of building 60 houses on agricultural land at Higher Town, Sampford Peverell on the dubious justification of housing needs for staff at the proposed M5 Junction 27 development.

Minor Modification 141: DM2, Renewable and Low Carbon Energy

We support this Minor Modification for the following reason:

- The decision not to identify areas suitable for wind energy development in the Local Plan conforms to Government policy as stated in the WMS of 18 June 2015 and in the Planning Practice Guidance and is consistent with the policy adopted in other parts of Devon. It allows areas suitable for wind energy development to be identified in Neighbourhood Plans.

Finally we would like to commend MDDC on producing a comprehensive Local Plan document and request that our proposed amendments above are considered and inserted as appropriate.

We would like to register our intention to speak at the Local Plan hearing by the Planning Inspectorate and look forward to receiving notification of the hearing.

Yours faithfully



Michael Scott
CPRE Devon
Mid-Devon District

CC Mid- Devon District Councillors, Neil Parrish MP, Ben Bradshaw MP

6212/CU1-CU6

6212/9V

6212/CU7-CU12



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Cullompton and Junction 28 Minor Modifications. Local Plan 2013-2033

Cullompton is a small self contained market town to the east of Mid Devon with a population of approximately 7,500. It is set in the rural rolling Devon landscape of gentle hills and tranquillity of the countryside. The Blackdown Hills (AONB) are immediately to the east.

The main industry is agriculture with both arable and grassland. Because of its setting and rural tranquillity it has become popular with tourists who come to walk, fish, ride and tour by car.

Access to the other two main towns in Mid Devon Crediton and Tiverton is by narrow restricted roads. The M5 and A361 is now the main route to Tiverton. The 10-mile road to Honiton, the A 373, and the A 303 is classified as an A road but is one of the few roads in England not wide enough for a small HGV and car to pass in several places, it also has frequent speed restrictions. Access to the north to Taunton is via the M5. Access to the south and Exeter is also via the M5

Cullompton Town Centre is a narrow street and suffers frequent traffic hold ups.

The proposal of massive housing developments on both sides of the motorway would create two separate townships, and be unsustainable in their own rights.

The proposed developments are not environmentally sustainable and would destroy large areas of good agricultural land. Much of the land is in a flood plain and there are many ancient hedgerows and small woodlands. A survey in 2016 by CPRE showed that there is enough brown field land available in England to build one million homes. The recent Government White Paper issued 8th February 2017 stated that where-ever possible brownfield sites must be used first for housing. It further reinforced that statement by saying it would reduce planning permission from three years to two years before

commencement of work in order to encourage developers to build on brown field sites already granted planning permission.

The plan is further unsustainable because the proposed housing of such an enormous number is not based on any employment being available in the immediate area. Housing has traditionally been employment based for example the large estates in Tiverton because of the Heathcote factory. No such provision is made in Cullompton so if 3700 homes are built it necessitates some 4,000 to 5,000 people having to travel elsewhere for employment. This would probably be to Taunton, Exeter or even Bristol. A considerable strain would be put on the M5 which is already at its peak at certain times. This is totally at odds with every government directive trying to minimise the use of cars.

A massive 'Garden Village' of 5,000 has been proposed by Mid Devon District Council and accepted by the Government although it is not included in the Local Plan Proposals. This would further increase the problems of unsustainable communities within Cullompton with every other aspect of transport and the use of green fields sites on good agricultural land involved.


While Mid Devon CPRE recognise that Cullompton could easily manage with a few extra houses of up to 100, a massive development of 3,700 houses would conflict with NPPF in that it would not create sustainable communities but dormitory towns.

It further conflicts because no provision for doctors and dentists practices has been made. There is no mention of additional schools being built.

Air quality is becoming a serious issue in Mid Devon and a massive increase in the number of vehicles would exacerbate the problem.

Much of the proposed development Policy CU 1 north west Cullompton of 100 hectares is on a flood plain in the Culm Valley. This is socially and environmentally unacceptable.

Mid Devon CPRE objects to the proposals on such a massive scale in Cullompton.



13/2/17

Michael Scott
CPRE Mid Devon