

MID DEVON CPRE GROUP

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To: Mr. Peter Williams,
Local Plan Review,
Forward Planning,
Mid Devon District Council,
Phoenix House,
Phoenix Lane,
Tiverton EX16 6PP

16th August 2013

Dear Mr. Williams,

Re: The Local Plan Review: Scoping Report – July 2013 – Mid Devon District Council

Thank you for kindly sending the Mid Devon CPRE Group a paper copy of the above report which has made it much easier to understand and respond to the different Options put forward in the report. The Mid Devon CPRE Group discussed the Report at its recent meeting and asked me to respond on behalf of the Group as its secretary. The Group's response is as follows:-

- Firstly the Group supports and welcomes the Vision for Mid Devon on p.14 in respect of providing "a clean, green, safe environment" as well as "good quality local employment, housing and services" etc. CPRE too welcomes the Vision to "Conserve and enhance the area" and to "Respect environmental limits".
- Housing: – p.16 to p.19. CPRE supports Option 1 to retain the current strategy with the major developments being in Tiverton, Cullompton and Crediton with Bampton as a large village. The other two Options are considered not to be sustainable as they would, by dispersing development, cause more travelling thereby increasing the carbon footprint along roads and lanes which are inadequate for the extra traffic caused by such development. By containing development in concentrated areas, the need for travel is more contained and the countryside which is an important economic asset for Mid Devon due to Tourism as well as for local people retains its special qualities and tranquillity.
- Meeting Housing Needs (COR 3): p.19 to 22 – CPRE supports Option 1, to retain current policies as is put forward but taking into account the reduction in density which came forward from the current Government. CPRE has long been concerned that there should be a good proportion of Affordable Housing in proportion to Market Housing especially as there is a reference to such a need existing in the district and where house prices are high.
- Meeting Employment Needs (COR 4): p.23 to 25. CPRE believes that a mixture of the two options could be advantageous if allocated in a careful way. It is necessary to have a balance for employment land to housing in the same area to retain a working vitality and to encourage families to remain and to settle in the area. This is also more sustainable as people do not have to travel so far. Farm diversity is already seemingly allowing small businesses e.g. offices at Junction 27.

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- Retail: p.26/27. CPRE supports Option 1 as it is so important that town centres remain vital and protected. CPRE notes that this is supported by national policy as well as by the National Policy Framework and the Local Plan Part 3 (para. 2.35).
- Infrastructure Provision (COR 8): p. 26 to p.30. CPRE supports the Mid Devon Citizens Panel's preference for new public open space and green infrastructure as both are important for the quality of people's lives, Bio-diversity and to be enjoyed by those visiting the area. Once again CPRE considers that a mixture of both Options could be beneficial. Option 1 is important as it would provide schools, communities, open space and roads to serve large development such as the Tiverton Eastern Urban Expansion. But CPRE considers that it is also important that the Community Infrastructure Levy is available to fund smaller projects as for instance in villages when they need upgrading of their children's play area or a small skate park for youngsters or improvements to a playing field hall.
- Environment: Local Distinctiveness (COR 2): p.30/31. On balance CPRE supports Option 1 retaining " a strategic policy similar to COR 2" as it is difficult to assess Option 2 without more detailed information. CPRE is concerned about any threat to the countryside which, as a previous Inspector said for the Mid Devon Local Plan some time ago, is a finite resource and should be protected for its own sake. COR 2 Policy helps to give some protection and also for the historic built environment, precious to us all. It is hoped that with a later report there would be more detail for Option 2 so as to make a more informed choice.
- Tiverton: p.32/33. CPRE does not support Option 1, the expansion of Tiverton further to the East as the land is prime agricultural land, Grade I, and its loss is unsustainable when we should be retaining such land for food production. Grade I land is recognised as being important for food productivity in the NPPF as is Grade II land. The Grand Tiverton Canal is also recognised as an important asset both for local people and also for Tourism which brings economic benefits. The historic settlement of Halberton would also lose its identity if there is any further eastern Tiverton expansion. The harm for such a proposal, CPRE believes, strongly outweighs any advantages. It would therefore be contrary to the NPPF. For these reasons therefore CPRE supports Option 2 although it questions the need for any more housing as the TIV EUE has not yet been started and would probably adequately provide housing and employment beyond the required time scale of 2031
- Cullompton: p.34 to p.36. CPRE supports Option 2. Cullompton is already expanding to the north west on good red land valuable for agriculture and it is hoped that the green infrastructure areas will be retained as already put forward. CPRE believes that smaller sites around Cullompton are more suitable as long as the highways' infrastructure is adequate.
- Crediton:p.37/38. CPRE supports Option 1. Having been involved with the various different Mid Devon Plans over the years, the Group agrees that the topography of the town causes great limitations for expansion with the high hills to the north, the valleys to the south and west as well as the flood plain by the A377, Downs House and Tesco area. It is noticeable that the site near Tesco's for development has remained vacant without a buyer for some years.
- Bampton: p.39/40. CPRE supports Option 2, to re-classify Bampton so that its status matches the designated villages in Mid Devon. The small town too as with Crediton has difficult topography
- Villages (COR 17): p.41/42. CPRE supports Option 1, to continue with current strategy. As already stated in its comments for "Housing" p.1, if a more permissive approach is taken in villages this would be unsustainable as there would be more traffic on the road and also a greater loss of productive farm land if villages were to expand beyond their existing limitations. There would also be a demand for services such as improved roads, schools, electricity and water provision if Option 2 came forward.

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- Managing Development (Local Plan Part 3): CPRE supports Option 1, to "Roll forward the existing LP3 policies into the Local Plan" as this would provide stability for all those working with or using the Mid Devon Local Plans. The criteria would therefore be easier to assess. Option 2 seems to suggest constant ongoing changes which would make it difficult for all concerned to work with except for those with an expert knowledge. It would also cost the public purse more as more documentation would have to be produced. Officers' time would also be increased possibly to the detriment of planning application matters.

I hope that the above comments are helpful and thank you once again for kindly sending the consultation Scoping Report to the Mid Devon CPRE Group,

Yours sincerely,

Mrs. Julie Rudge:
Mid Devon CPRE Group Secretary.

Copies to: Committee Members of the CPRE Mid Devon CPRE Group.