

Safe roads, reliable journeys, informed travellers

Our ref: Mid Devon LDF  
Your ref: LP Review/5

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



Sally Parish  
Asset Manager  
1st floor  
Ash House  
Falcon Road  
Sowton Industrial Estate  
Exeter EX2 7LB

Direct Line:

15 August 2013

Via email: [planningconsultations@middevon.gov.uk](mailto:planningconsultations@middevon.gov.uk)

Dear Sir/Madam

**Local Plan Review: Scoping Report and Sustainability Appraisal consultation – July 2013**

Thank you for providing the Highways Agency with the opportunity to comment on the above documents. The Agency has provided a number of responses to Local Plan consultations in the past, and this letter should be read in conjunction with those previous representations.

The Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN) which in Mid Devon comprises the M5. It is on the basis of these responsibilities that the comments that follow in this letter have been made. The Agency is keen to ensure that the Local Plan takes account of the need for transport and land use planning to be closely integrated and that the principles of sustainable travel are reflected when assessing the suitability of sites.

In support of planning applications in proximity to the SRN, or of a size that could affect it even if they are some distance away, the Agency would need to see a robust transport evidence base which demonstrated the suitability of development without detriment to existing SRN users. Our comments on the parts of the documents which are relevant to the Agency in this context are set out below.

Local Plan Review Scoping Report

The Agency welcomes the commitment to using an evidence based approach to gauging the level and location of development as set out in the Scoping Report. We acknowledge the baseline data relating to the increase in population over the last 10 years and the implications that this has for the need for housing, employment and associated infrastructure. The Scoping Report presents several options relating to the approach that should be taken to development in Mid Devon based on the baseline data that has been gathered. Our responses are as follows:

*Housing*

The Agency favours Option 2 – *Revise policies according to up to date and relevant evidence about matters such as housing need, demand and viability.* Option 1, to retain affordable housing and dwelling density targets etc, is based on old information as they are the current policies. The Agency is not suggesting that these will not continue but that the outcomes of

Strategic Housing Market Assessment and subsequent viability evidence should steer the policy based on the latest information available.

#### Employment

The Agency favours Option 2 – *Follow the recommendations of the Employment Land Review, reducing the overall target for employment growth within use classes B1, B2 and B8 whilst encouraging the development of smaller sites.* The current strategy ratio is 1:1 between jobs and population, but this needs to be reviewed to take account of a current evidence base. It is understood that the Employment Land Review is current evidence.

#### Infrastructure

The Agency favours Option 1 – *Urban extensions incorporate specific items of infrastructure such as schools, community facilities and open space, while 'off site' infrastructure (eg a relief road) is funded by all development liable to pay the Community Infrastructure Levy.*

The Local Plan should identify the infrastructure necessary to support the development included within it together with the mechanisms necessary to deliver it in a timely fashion. Either option would require this process to be undertaken but mechanisms are likely to be simpler to implement with a reduced number of allocations. The Agency favours this ahead of a greater number of smaller allocations requiring minimal infrastructure, and CIL being spent on all types of infrastructure in the local area. Large extensions, whilst potentially generating more traffic and having greater impact in a smaller area, present greater opportunity for mixed development types and allow a holistic approach to development where we can ensure that all impacts are sufficiently mitigated. As with all development that will generate traffic, any proposals will need to be accompanied by a robust transport evidence base.

#### Tiverton

The difference between the two options presented is the inclusion or exclusion of expansion to the east. The decision on which option to pursue should be evidence based and it is not clear from the information presented that adequate evidence yet exists. Clearly, expansion to the east would bring development closer to the M5 but provided that adequate transport infrastructure can be identified to support it, the Agency would have no objection. Whichever approach is taken it will also be important to take on board the findings of the SHMA. Any proposal for development of this type will need to be accompanied by a robust transport evidence base.

#### Cullompton

The decision on which option to pursue should be evidence based and it is not clear from the information presented that adequate evidence yet exists. The performance of M5 J28 is a key concern for any development proposal within Cullompton but provided that adequate transport infrastructure can be identified to support the development, the Agency would have no objection.

The provision of an urban extension seems the best way to deliver the housing numbers required, as a holistic approach can be taken to infrastructure as it is unlikely there are any other large sites that could accommodate sufficient growth. A number of smaller sites is an option, but a joined up approach is more difficult if that is determined to be the best way forward. Notwithstanding these comments, any proposal for development of this type will need to be accompanied by a robust transport evidence base.

#### Crediton

The Agency's preference is for Option 2 – *Depending on up to date evidence of need, suitability and achievability, allocate sufficient land to meet development needs.*

This option is preferable to the continuation of under provision in Crediton, as the Agency understands the need to meet housing level requirements so the findings of the SMHA should be reflected in policy going forward assuming that site constraints can be overcome. With the levels of development being considered and the distance of Crediton from the SRN it is unlikely that there will be adverse impacts on the SRN, although supporting evidence would need to be included with any applications to show that this is the case.

#### Bampton

The Agency has no preference between Option 1 or Option 2. With the levels of development being considered and the distance of Bampton from the SRN it is unlikely that there will be adverse impacts on the SRN, although supporting evidence would need to be included with any applications to show that this is the case.

#### Villages

The Agency favours Option 1 – *Continue with current strategy but reassess which villages should be defined as settlements suitable for development.* The Agency understands that there is a need on occasion for development in the villages but supports the reassessment of which villages are suitable for this. Policies should always reflect the latest guidance and studies that are available.

#### Managing Development

The Agency favours Option 2 – *Amend the policies in response to any updates to national policy or guidance, and any lessons learned through the implementation of LP3 policies.* In order for the Plan to be considered sound it must reflect latest national policy and guidance and be evidence based.

#### Local Plan Review Sustainability Appraisal Scoping Report

The Agency understands and supports the requirement to promote sustainable development through integrating sustainability considerations into plan making. We acknowledge and support the planning system in the development of a strong economy, the delivery of housing to meet need and the infrastructure to enable it to function, and the reduction of carbon emissions by increasing opportunities for the use of sustainable modes of transport.

#### Baseline

Due to the nature of Mid Devon and the distribution of its population we acknowledge the high dependency on the private car across the District, with continuing growth in the levels of car ownership.

#### A Framework to Assess Sustainability

In terms of the framework for assessing sustainability, the main objective which is of relevance to the Agency is delivering the necessary infrastructure. This is an essential part of assessing the sustainability of a scheme and imperative in order for the SRN to support sustainable economic growth.

#### Conclusions

As stated throughout this response, all developments likely to affect the operation of the SRN will need to be supported by a Transport Assessment/Statement and a Travel Plan and would need to be reviewed against the requirements of the Agency's policy document entitled "The Strategic Road Network and the Delivery of Sustainable Development".

The Agency recommends that all future proposals be assessed in terms of their impact on the SRN and whether they comply with sustainable transport policy objectives and relevant guidance.

These comments do not of course prejudice any future responses on site specific matters, and we would request that the Agency is consulted at an early stage on development sites that come forward. In the meantime, should you wish to discuss any of the above please don't hesitate to contact me or Nigel Dyson.

Yours faithfully 

Sally Parish  
NDD South West Asset Development  
Email: :

cc: Chris Harding, Halcrow  
Nigel Dyson, Highways Agency