



## Local Plan Review Proposed Submission

### Form for representations

Please return to Mid Devon District Council by **27 April 2015**

When making a representation you must include your name and full postal address, otherwise your comments cannot be registered. Addresses will only be used to inform people about the new plan and other planning matters.

This form has two parts –

Part A – Your Details

Part B – Your representation(s). Please fill in a separate Part B for each representation.

Data Protection Act. Please note that this information on this form will be entered onto a database and the paper copies retained on file. The information will be used for the purposes of Town and Country Planning and may be viewed by any person for such purposes.

The Local Plan Review and associated information can be seen on the Council's website at [www.middevon.gov.uk/localplanreview](http://www.middevon.gov.uk/localplanreview)

If you require this information in another language or format, please contact us on 01884 255255 or email [planningconsultations@middevon.gov.uk](mailto:planningconsultations@middevon.gov.uk)

## Part A

	1. Personal Details*	2. Agent Details (if applicable)
Title	MR	
First Name	ROY	
Last Name	GOULD	
Job Title (where relevant)	RETIRED	
Organisation (where relevant)	—	
Address 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone		
E-mail Address		

*\* If an agent is appointed, please complete only The Title, Name and Organisation boxes below but complete the full contact details of the agent in 2*

## Part B – Please use a separate sheet for each representation

3. Name or organisation:

4. To which part of the Local Plan Review does this representation relate?

Paragraph  Policy  Policies Map

*See ATTACHED CORRESPONDENCE*

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

5.(1) Legally compliant Yes  No

5.(2) Sound Yes  No

5.(3) Complied with the duty to co-operate Yes  No

\*Please see the guidance note appended to this form for an explanation of what makes a plan 'legally compliant', 'sound' and complied with the 'duty to co-operate'.

6. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to cooperate, please also use this box to set out your comments.

(Continue on a separate sheet if necessary)

7. Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to what test you have identified at 6 and say why this change will make the Local Plan Review legally compliant or sound (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). It will be helpful if you are able to put forward revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

Further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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

Yes

No

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

(Continue on a separate sheet if necessary)

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to appear at the examination.

10. Please indicate whether you wish to be notified of:

- The date the Local Plan Review is submitted to the Inspector
- The publication of the Inspector's recommendations
- The Council's adoption of the Local Plan Review

Signature

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Date

	24/04/2015
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Please complete the form online at [www.middevon.gov.uk/localplanreview](http://www.middevon.gov.uk/localplanreview), or return completed forms to:

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

or email to [localplanreview@middevon.gov.uk](mailto:localplanreview@middevon.gov.uk)

# Guidance Notes to accompany Representations Form

## 1. Introduction

1.1 The Local Plan Review has been published so that representations can be made prior to submission of the plan for examination. The Planning Inspector will consider the representations. The Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act) states that the purpose of the examination is to consider whether the Local Plan complies with the legal requirements and is 'sound'.

## 2. Legal compliance and Duty to Co-operate

2.1 The Inspector will first check that the Local Plan Review meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the 2004 Act before moving on to test for soundness.

2.2 You should consider the following before making a representation on legal compliance:

- The Local Plan Review in question should be within the Council's Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the Local Development Documents it proposes to produce, setting out the key stages in the production of any Local Development Documents which the Council propose to bring forward for independent examination. If the Local Plan Review is not in the current LDS it should not have been published for representations. The LDS should be on the Council's website and available at the main offices.
- The process of community involvement for the Local Plan Review in question should be in general accordance with the Council's Statement of Community Involvement (SCI). The SCI is a document which sets out the Council's strategy for involving the community in the preparation and revision of Local Development Documents (including Local Plans) and the consideration of planning applications.
- The Local Plan Review should comply with The Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the Council must publish the documents prescribed in the Regulations, and make them available at their principal offices and their website. The Council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The Council is required to provide a Sustainability Appraisal Report when they publish a Local Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure that they reflect social, environmental and economic factors.

2.3 You should consider the following before making a representation on compliance with the duty to co-operate:

- The duty to co-operate was implemented by the Localism Act on 15 November 2011 which also made some amendments to the 2004 Act and any plan submitted for examination on or after this date will be examined for compliance. LPAs will be expected to provide evidence of how they have complied with any requirements arising from the duty.
- The Council has a Duty to Cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. The duty requires cooperation between councils and prescribed public bodies such as the Environment Agency and Natural England.
- The 2004 Act establishes that non-compliance with the duty to co-operate cannot be rectified after the submission of the Local Plan Review. Therefore the Inspector has no power to recommend changes in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

### 3. Soundness

3.1 Soundness is explained in the National Planning Policy Framework, paragraph 182. The Inspector has to be satisfied that the Local Plan Review is positively prepared, justified, effective and consistent with national policy.

#### Positively prepared

The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

#### Justified

The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

#### Effective

The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

#### Consistent with national policy

3.2 The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

3.3 If you think the content of a Local Plan Review is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national policy? If so it does not need to be included?

- Is what you are concerned with covered by any other policies in the Local Plan Review or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Local Plan Review unsound without the policy?
- If the Local Plan Review is unsound without the policy, what should the policy say?

#### **4. General advice**

4.1 If you wish to make a representation seeking a change to the Local Plan Review you should make clear in what way the Local Plan Review is not sound having regard to the legal compliance, duty to co-operate and the four 'tests of soundness' set out above. You should then try to support your representation by evidence, showing why the Local Plan Review should be changed. It will be helpful if you also say precisely how you think the Local Plan Review should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues which he/she identifies for examination.

4.2 Where there are groups who share a common view on how they wish to see the Local Plan Review changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



## Local Plan Review

## extended consultation time

CU 19 has been a late annex so I feel it merits a comment as it extends the original CU14 Cullompton Eastern Relief Road zoning. Very rational too as it opens up access options for the CU11 East Cullompton Urban Extension and so could somewhat alleviate pressure around M5 J28, for which I know will be subject to further public consultations later. Enclosed is a copy of our NP Steering Group analysis study (attachment cu 19a) of CU11 which has suggested access solutions .... BUT also especially "highlights" the absolute attention to protect an invasion of overlooking the privacy of Upton fishing lakes and visitor lodges - a vista obviously recognised by our astute planners who valued this unique setting. Our NP article makes this clear by endorsing NO housing on this north hillside although a road/path/cycleway can be accommodated even if partly suppressed with some screening.

## CIL

To follow the detailed logic of the Local Plan Review I feel the new formula is NOT likely to very quickly fulfil the desirable said aims in providing our expanding community aspirations in infrastructure, leisure and sport etc.

Planners on all local levels will have to have significantly more influence in attracting the right developers.

## Local Plan Review – form for representations

For this response, I enclose copies of my response to the the former LPR consultation ending March 2015 which is therefore an ENDORSEMENT of your Submission which now substantiates the Council's massive earlier exploration towards very favourable local community townships.

Roy Gould



This Land Supply Task Group has concentrated attention to the prospect of a Cullompton East (of M5 J28) expansion. The topography is slightly undulating but provides easier and more level community passage [ VERSUS part of the North West development with some "mountainous" access for young families to that areas proposed primary school location ].

The main East Urban expansion, principally accessed from along the Honiton Road, deserves meriting a " Garden City " status design approach. More recent developments on Willand Road and (original) Swallow Way are examples of good tasteful property estate layouts and designs ....and THOROUGHFARES. (NOTE: in this report we refer to THOROUGHFARES as a road free of independent property driveways ! ). It is here that there has to be a logical and resplendent design aspect to endorse our Neighbourhood Planning Steering Groups recognition of Cullompton's historic heritage streets and lanes. ....The sense of recapturing the " ancient belonging " factor.

Within the East Urban Extension are the presence of major overhead power lines - especially to the areas on the northern fringe. These will somewhat dictate to this estates configuration ..... There would be an initial visual impact though tree avenues can be nurtured each side yet allowing freedom of overhead maintenance and repairs. BUT, in our view, we strongly discourage the construction of ANY properties TOO near these lines !

Land around "The Cummings" : Homes on the HILLTOP can be comfortably incorporated and at the hill summit level a footpath/cycleway link from Honiton Road to the Culm River valley and Last Bridge should be assured..... but the hillsides to remain rural farm fields to protect and treasure the privacy of UPTON LAKES.

Whilst J28 remains a temporary hindrance, we strongly propose, ANYWAY, that a new THOROUGHFARE is created via the former "nursery" site and down to the last bridge - this to serve as a "local" valuable link to the college, sports centre, the fields, Padbrook Park, Aldi etc.

Meanwhile, a local idea for a J28 improvement to meet a usual national motorway network Town connection standard (this a dumbell junction system) is being prepared by a resident and to be presented soon.

If Cullompton is to properly and confidently develop in "fields" of housing, employment, shopping and tourism, it has to attract and sensitively accommodate city folk with an astute choice of good rural style housing complemented by adjacent easy access local leisure spaces and amenities.

Our appraisal of the remainder of sites on the SHLAA List were completed earlier and each site was individually commented upon.

Task group members: Roy Gould, Gordon Guest, Pauline Hammett

15<sup>th</sup> August 2014



## Local Plan Review: Options Consultation

The Local Plan Review is intended to supersede existing adopted planning policies for Mid Devon, including the Core Strategy (adopted 2007), the Allocations and Infrastructure plan (adopted 2010) and Development Management policies (adopted 2013). Initial consultation on the scope and broad options for planning strategy took place in July/August 2013 and the Council has now produced draft policies and options for consultation.

In order to take part in the consultation, please ensure you read the options document, available at [www.middevon.gov.uk/localplanreview](http://www.middevon.gov.uk/localplanreview), and submit your response by 24 March 2014. Thank you for your time.

### Do you agree with the Vision and Spatial Strategy?

Yes

No

Not sure

Is there anything else we should change or include in the Vision and Spatial Strategy?

**NONE.** Ideal guidelines for improved town and village community well being, especially provision of green infrastructures incorporating personal leisure amenity space and tourism development.

### Draft Policies S1 and S2 set out the Council's approach and priorities for sustainable development.

### What is your opinion about these policies?

Support

Object

Other

Do you have any specific comments about these policies?

Excellent draft confidently creating new "ideal" intergrated cultural communities.



## Local Plan Review: Options Consultation

**Policy S3 includes two options for the distribution of development over the plan period (2013-2033). The first option is to continue focusing development in the three main towns according to their current sizes and roles. The second option is to provide for long-term growth (post-2026) in a new community. A separate question deals with the location of a new community, but please indicate your opinion in principle below.**

**Which option do you prefer and are there alternative options we should consider?**

- Option 1: Continue to focus most development in the towns up to 2033
- Option 2: Focus development after 2026 in a new community
- Other

Are there any alternative options we should consider?

Options 1 and 2 are both applicable. see below.....

**If the Council chooses to pursue Option 2 under Policy S3 (the new community option), which location would you prefer and why?**

- Option 2(a) - Land at Junction 27 and adjoining Willand
- Option 2(b) - East Cullompton (east of Junction 28)
- Other

Are there other locations we should consider and why?

..... providing improved pedestrian and cycle access to main town is constructed. Could be via an East Culm Farm development road/pathway/cycleway to the M5 overbridge to the CCA fields and Meadow Lane where the new Aldi store will be a magnet for south of town shops and library. Also offers option for Historic Transport Museum - see Hartnoll Farm

(( option 2a is a wrong location to create a new community infrastructure such as 'might' be achieved at Cranbrook and be perched beside and above the M5. Peoples quality of home living has to be recognised)).

Any commercial development at J27 could embrace the Transport Museum - see accompanying site plans relating the Cullompton and J27.





## Local Plan Review: Options Consultation

**Policies S4-S6 are strategic housing policies setting out a potential target for annual rates of housing across the district, the proportion to be affordable and adaptable, the amount of public open space to be provided, and the Council's approach to ensuring housing delivery.**

**Do you support these policies or have suggestions on how they could be improved?**

Support

Object

Other

Do you have suggestions for how these policies could be improved?

... but INCREASE off-road car parking provision criteria in all new developments - notably seen inadequate around west Cullompton Tiverton Road.

**Economy and infrastructure policies are set out in Policies S7-S9 of the options document. These propose 154,000 square metres of commercial floorspace (including retailing) over the plan period (2013-2033) and set out the Council's approach to town centres and infrastructure delivery.**

**Do you support these policies or have suggestions about how they could be improved?**

Support

Object

Other

How could we improve these policies?

Emphasis on vitality of town centres.

Retain commercial floor space allocations (currently over subscribed) for new residents with probable business inspirations.



## Local Plan Review: Options Consultation

**Policy S10 seeks to sustain the quality of Mid Devon's environmental assets and minimise the effects of development on climate change.**

**Do you support this policy and do you have suggestions about how it could be improved?**

Support

Object

Other

How could the policy be improved?

item a) as might be applied to new tourism facilities.

items f) and g) when identifying green infrastructure around/beside proposed new housing.

**Policies S11-S15 set out strategic policies for the towns, villages and countryside, including expected annual rates of development for the towns which can vary depending on the options discussed under Policy S3 (amount and distribution of development).**

**Do you support these policies and do you have suggestions about how they can be improved?**

Support

Object

Other

How might these policies be improved?

No suggestions offered



## Local Plan Review: Options Consultation

**The Council adopted its Development Management Local Plan (LP3) in October 2013. This plan is included in the options consultation without modification, but pages 102-107 explain where amendments or new policies are being considered.**

**Do you have anything to say about the amendments or new policies being considered, or comments about the existing adopted policies included within the consultation document?**

A perfectly reasonable update review following new government guidelines, perhaps especially DM 2/3/14& I5 plus parking I referred to re S4 to S6.



## Local Plan Review: Options Consultation

**The Site Allocations section of the Local Plan Review options document includes numerous options for development sites in the towns and villages. These exceed the amount of development likely to be required, but the Council wishes properly to consider all the available sites before making decisions on which are most appropriate.**

**Please tell us your opinion on specific sites in this chapter of the plan, continuing on a separate sheet if necessary. Providing detailed reasons for any objections will help us evaluate and compare the suitability of different options.**

CV10 and CV11 Soil drainage already at full capacity in Cullompton. Be aware !

Hartnoll Farm see separate accompanying sheets

J27 commercial and Honiton Road Cullompton (East Cullompton Urban Extension)

see Hartnoll Farm reference to Historic Transport Museum and Showground.





## Local Plan Review Options Consultation

### TIV 2 Hartnoll Farm

The illustration of land use and content is interesting.

What is so critical is a retained rural aspect from the main road so there is NO real evidence of development between Post Hill and the canal road bridge towards Halberton village.

I believe the existing commercial site area, thoughtfully screened by a soil bund and trees, could be allowed further small unit development – there is a shortage around Tiverton.

Attached is a recent press announcement regarding a Historic Transport Museum Showground which though relating to J27 so suggested to MDDC two years ago for their Economic Development Strategy is also suitable for part of Hartnoll Farm. (I have marked a map where the apt location could be). Although an area of sixty acres is desired for this complete venture, some fifty acres would remain reserved as a historic working farm. I envisage the site access to this and perhaps another site content to be directly east of the commercial centre from the splay on the main road used for the Mid Devon Show.

NOW, coupled to this transport exhibition could be the re-use of the railway as a heritage line and as a commuter access which we know could be taken up to Tiverton Parkway in fields beside the main line. Again, Hartnoll Farm could accommodate the working sheds and maintenance and be secure with the Transport Museum.

For TOURISM, these facilities plus the canal offer FOUR attractions in rural green infrastructure surroundings within walking distance of Tiverton residents. I do not expect visitor numbers to exceed the usual that South Devon Railway OR West Somerset Railway receive which is outside rush hours – certainly not for some years before the infrastructure is achieved.

I see the way forward is the formation of a Community Enterprise.

Roy Gould

21<sup>st</sup> March 2014



# Heritage Transport Museum Showground

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A suitable 60 acre site was pinpointed at Junction 27 two years ago as a proposal to be considered within our Local Council's then Economic Development Strategy.

Mid Devon District Council's current Options Consultation and Local Plan Review is a chance to publicly announce this ambitious project. Two alternative local sites could also be regarded as appropriate and fitting to support our local Tourism and be within the Plan Review.

The rural site area desired is to incorporate ONE mile of roadways to contain tram and trolleybus workings and to serve for earlier omnibuses, classic road transport, cars and bikes, military, fire & service vehicles displays. An adjoining cinder track for steam traction and horse carriage workings.

These mostly privately owned vehicles are already passionately nurtured to restoration and function the object is to present them for public exhibition by a varying calendar of events.

The large rural setting guarantees a maintained mostly green infrastructure and can happily accommodate depots and garages; selected restoration demonstration building; archives; catering; public parking and facilities whilst still retaining an element of farming practice.

The diverse constitutions of Groups and Trusts suggest this land project should be set up as a Community Enterprise and each is then invited to present a representative to a governing body.

When a location is agreed, preparation of funding from National Sources, private, commercial and company sponsorships and philanthropists can be sought to gradually complete the infrastructure.

Five years exploration of prospect venue locations has been facilitated by Roy Gould who as a member of five vehicle, two steam railways and five canal preservation groups represent only a small margin of our Great Britain's working-man's infrastructure HERITAGE.

Such a project brings together some management employment and apprenticeships, but mostly a host of volunteers, hobbyists, a "Mens Sheds" association style brigade, but above all affords a unique educational experience for visitors extending to the realm of reminiscence that historic places, museums, and galleries equate.

\* 24.3 HECTARES

Roy Gould APRIL 2014



# Local Plan Review: Options Consultation

**\*NOTE: RESPONSES CANNOT BE REGISTERED WITHOUT A NAME AND ADDRESS**

**Name**

Roy Gould

**\*Please provide your postal address**

House No.	<input type="text"/>	<input type="text"/>
Address 1	<input type="text"/>	<input type="text"/>
Address 2	<input type="text"/>	<input type="text"/>
Town	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>

Thank you for taking part

