

**Sandra Hutchings**

**From:** Paul Samuels  
**Sent:** 02 March 2014 21:21  
**To:** DPD  
**Subject:** Response to Local Plan Review - Jan 2014



Dear Sir/Madam,

I am writing in response to the Local Plan Review document and consultation conducted by Mid-Devon District Council. In order to provide clear and succinct feedback I have structured my feedback into the following sections:

- 1) Effectiveness of the consultation
- 2) Economic versus Environmental sustainable development principles
- 3) M5 J27/28 plans

1) Effectiveness of the consultation

Despite the importance of the Local Plan Review and its long term consequences for Mid-Devon I would challenge whether the Council has met it's legal obligation to consult the residents of Mid-Devon:

- Low profile - little seems to have been done to raise awareness that the consultation is underway or of the key local event sessions. I personally only found out about these dates from a poster that a local resident put on the noticeboard in Uffculme. Following from that a google search found local press articles that were biased in favour of the J27 development and which did not contain any links or sign posts to the Mid-Devon consultation process.
- Accessibility - aside from the local events which were not well advertised the bulk of materials are hosted online which discriminates against elderly residents who are significantly less likely to be able to access online services and there seemed no provision for those with visual impairments. Having downloaded and read both the full consultation document and the summary I would suggest that these documents require a degree of technical knowledge, a lot of time, patience and many of the maps provided are of low quality. I understand that printed documents are available at Council offices but when I asked for copies the staff were completely unaware of the consultation until I pointed to the poster on display. Subsequently I was told that only reference copy and as the full document is in the region of 180 pages I would have been there a long time. Furthermore as a full time worker, accessing the document outside of my working hours is not possible due to the limited opening hours of the council offices.

2) Economic versus Environmental sustainable development principles

While I support much of the Option 1 approach outlined and its focus on regenerating the market towns I believe that excess emphasis has been placed on the economic principles of sustainable development rather than the environmental.

- Small business support - the Plan outlines the fact that Mid-Devon is fortunate enough to have a higher than average proportion of SOHos and SMEs (Small Office, Home Office & Small to Medium Enterprises). The main challenges facing these business relate to IT infrastructure (mobile coverage, absence of fast broadband speeds) and investment capital not the provision of large scale office or business premises (I believe this is primarily Options 2a/b). Nor given this economic profile is it sensible to propose substantial increases in retail space and the report does identify the fact that the retail statistics it uses are known to be unreliable. The decline of the high street across the country and the predicted growth in e-commerce and m-commerce show that we need to diversify out town & village centres making them 'experience' destinations that can support and aid the local retailers. In particular plans to create out of town retail and entertainment destinations will drain resources away from the existing towns and add little to the local economy aside from possibly minimum wage jobs with no progression. Slough is a good example of a town that hosts major multinationals headquarters and extensive superstores which have failed to benefit the local economy.
- Destruction of agricultural land, forests and hedgerows - it is hard to judge the environmental impact of the proposed options from the Plan documents and the report notes that the 'Local Heritage Assets Register' is not available at the time of publishing the Plan. The plans for development at either J27 or J28 of the M5 will involve the loss of ancient woodland, agricultural land and hedgerows and all based on vague and dubious assertions that it will benefit the local economy when the reality is that it will 'hollow out' the town and village centres.

### 3) M5 J27/28

The plan for a substantial new development at and surrounding either J27 or J28 would have a negative impact on the existing Devon economic centres and runs counter to the logic of sustainable development centred on the existing market towns and villages:

- Existing housing/retail brownfield sites - there are substantial brownfield sites in Uffculme alone that could be converted into mid-density housing including the old brewery, the vacant garage and George public house on Commercial road, the old post office building, etc. I am not convinced that the Plan has fully identified all of the existing sites that could be used to address the housing shortage or be regenerated alongside the town centres. As already noted a large scale out of town development would draw resources away from the existing towns/villages as has been the case throughout Britain since out of town centres were first authorised in the 1980s. I'm sure you will recall that at the time it was strenuously denied by developers that high streets would suffer as a consequence but history has proved them mistaken.
- Experience high streets - the Portas review into the future of the high street identified the need to diversify the high street and to make it an experience destination that attracts visitors and shoppers alike. The planned development scoped out on page 100 will not only attract shoppers but is designed to also pull tourists away from the existing towns/villages. The provision of visitor centres, cinemas and leisure destinations will compete with Exeter, Tiverton and Cullompton. If these resources were allocated to the existing towns Mid-Devon could have high streets that showcase local produce, vibrant markets, local theatres and tourist experiences across the year bringing Devon's cultural heritage to life.
- Duplication of existing facilities - the majority of the facilities are already provided elsewhere in Mid-Devon or within a reasonable distance. Devon is far from short of horticultural centres, cinemas, theatres or hotels.
- Air Quality and Carbon emissions - the development would not have a central rail link relying on bike and bus routes from Tiverton Parkway. The truth is that plans such as these at Bluewater and Lakeside have led to a sizeable increase in road traffic as other forms of transport do not offer the convenience required e.g. few people cycle to a retail/entertainment destination as they cannot transport purchases back.
- Lack of support for small businesses - it is hard to see how the planned development will support the specific 'mittelstand' nature of the Mid-Devon economy. Of the 96 hectares devoted to commercial floorspace, which elements will actually be dedicated to small business premises?

I hope that the final Plan will take into account the views of local residents. Uffculme in particular has suffered a great deal at the hands of the aggregates industry which appears to get whatever it wishes from Mid-Devon Council including retrospective planning permission. I would like a response to the points I have raised above.

Yours faithfully

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