



WILLAND PARISH COUNCIL

Response to Local Plan Review Options Consultation January 2014



1. Preamble.

1.1 Willand Parish physical boundary is quite small when considered against surrounding Parishes. It has a clearly defined settlement area which has been imposed as the result of previous consultations and decision making processes.

1.2 It has the M5 motorway and the main rail line for the South West running through it. The main road servicing the village is the B3181 which bisects the village and is used as a relief road between J27 and J28 when the motorway becomes closed. It is also used as a 'shortcut' by a number of heavy goods vehicles on a daily basis in spite of the weight restriction limit through the village. There are flood plains which virtually restrict three sides of the Parish.

1.3 Over the years, particularly since the 1990's, there has been considerable expansion of housing most of which has been achieved WITHOUT matching or proportionate infrastructure provision. There has also been a proportionate provision of 'industrial/employment' land/buildings some of which still has spare capacity. Further industrial development has been provided in adjoining Parishes very close to the Willand Boundary. This provision is still being increased at this time. All have a direct impact on Willand village in some way.

1.4 The current 'head count' is 3,500+ residents in about 1,500 properties. Building densities are above 'Parish' recommendations in some areas.

1.5 **There is considerable strong feeling that the village has been overdeveloped.**

1.6 In terms of under provision of infrastructure the following issues are raised (in no particular order) to support that view:

- a) Other than the roundabout at Four Cross Way no improvement has been made to the B3181 through the village;
- b) The village has no 'identifiable' centre or focal point;
- c) Public open space is limited. There are small play areas dotted around the village with limited facilities. There is one larger area behind the village hall which is half owned by the Parish and the other half by Mid Devon District Council [MDDC]. Some areas are unusable at 'wet' times of year. Some areas are poorly maintained. The

football club field is private and NOT a public open space (some facilities – mainly the club room, not the pitch, – can be hired);

- d) The village hall, although added to over the years and greatly used, is limited in capacity and cannot fully cater for larger village events;
- e) There are a number of tennis courts - they are 'private' but can be hired;
- f) Willand Primary School is already over capacity and regularly has to use the village hall for a number of activities. Some minor building expansion is taking place but the provision of additional class rooms would lead to loss of already limited play area;
- g) The preschool is at capacity with no room to expand;
- h) The Youth Club and other 'youth related' groups are at capacity in numbers and available facilities;
- i) The only car park is owned by the Village Hall and is regularly full as it is used by the school as they have limited facilities;
- j) Design of development has resulted in insufficient parking provision which is resulting in the village having an 'on street' parking problem in many areas;
- k) Public transport is quite good for most of the day, although recently slightly reduced. It does not directly service the Willand Moor area. Links with Taunton are limited;
- l) Medical provision is limited and sporadic which means that many consultations/treatments require travel to Cullompton, Tiverton or Exeter;
- m) Previous provisions for retail and other facilities in development have been lost through viability (profit) arguments and so we have houses where there should have been retail and other facilities;
- n) Although an excellent facility in the village the Post Office is now considered to be too small with no room to expand;
- o) The allotments are full with a waiting list;
- p) The cemetery has room for expansion but this is only planned to deal with current housing/population numbers.

1.7 There are plans for a Health and Community Centre to be provided by the Parish Council at The Gables but this is in its infancy and could be 10 years before this facility maximises the full potential of what the Parish Council hopes to achieve on this site due to the needs of fundraising.

2. The Consultation Process.

2.1 In the near past consultation has taken place on business applications for J27, Local Plan Policy [LP 3] and the July 2013 Scoping Consultation by means of Parish Councillors and Volunteer Helpers speaking to individuals and 'group/society leaders' and giving feedback leading to discussion at scheduled Parish Council Meetings which were open to the public. A consensual response has then been submitted to MDDC.

2.2 The same process was followed in relation to the 'Options Consultation' but due to the size and content of the document discussions at scheduled Parish Council Meetings were spread over a number of meetings whereby a larger picture of the potential implications became apparent.

2.3 Parish Councillors received a presentation from a potential developer in relation to J27. An explanation of the proposals was received from a District Councillor. They also attended a presentation by MDDC officers which was held at the Village Hall. A number of parishioners also attended. Meetings and other communication took place with adjoining Parish/Town Councils which gave rise to a concern that a number of 'variations' of information were in evidence. The veracity of some of the information caused concern. Indications were that some landowners were not committed to the extent that other interested parties were telling councillors. This was confirmed at a public meeting by a major land owner for the J27 project.

2.4 Feedback to Parish Councillors gave cause for concern that the impact of the various options, particularly those linked to the J27 – Willand option, would affect the future wellbeing of Willand, its inadequate infrastructure and its residents. It was decided to hold a full consultation with the whole Parish.

2.5 Publicity for the '**Options Consultation**' and a public meeting was achieved via the media, posters and verbal communication at village events and by way of a leaflet drop through every door in Willand with the Willand Magazine which also contained an explanatory article.

2.6 A number of residents, some of whom would not be able to attend the meeting, sent emails and letters to the Parish Council with their views which have been taken into account in the preparation of the Parish response. They were also encouraged to share their response by writing to MDDC.

2.7 A Parish Meeting was held in the Village Hall at 1900 hours on Friday 7th March 2014 which was attended by over 300 residents (seating taken and standing room only for some). The County Councillor and three District Councillors were also present together with MDDC Head of Planning and Regeneration. A presentation of the proposals was given by the Parish Council with assistance in answering questions by MDDC Head of Planning and Regeneration. Comments made at this meeting are also considered in this response.

3. Format of Response.

3.1 The response is divided into six sections:

- A. Observations on the proposed overall policy which will apply to all areas [Para 4];
- B. Response to proposed housing sites within Willand Parish [Para 5];
- C. Response to proposed business/employment sites within Willand Parish [Para 6];
- D. Response to Junction 27 and Willand S3 Option 2a total proposals [Para 7];
- E. Response to the proposed business/retail/leisure facility at J27 [Para 8];
- F. Response to the option which would see a new housing development between Willand and J27 [Para 9].

3.2 It should be noted at this point that the Junction 27/Willand Option is not in Willand Parish but spread between three adjoining parishes – Halberton (mainly the housing), Burlescombe (leisure/retail) and Sampford Peverell (business). Although not in the parish of Willand each proposal is likely to have a greater affect on Willand than the host parish.

4. Observations on the proposed overall policy which will apply to all areas.

4.1 Whereas there is general support for the proposed 'Sustainable Development Principles' and 'Housing', issues raised in the immediate following paragraphs are submitted for consideration.

4.2 **Policy S2:** It is suggested that an additional paragraph be added to the priorities outline :- **m) Retaining sufficient areas of good agricultural land to support local provision of food and bio fuel production.**

4.3 **Policy S3. - Para. 2.11:** There is very small minority support in Willand for 'economic development at Junction 27 of the M5...'. The general feeling is that it will take employment opportunity away from designated employment sites in Willand and create greater 'travel to work' related issues including potential effects on carbon footprint and clean air issues. [See section 7 later]. The Scoping report 'showed little support for this option' and paragraph 2.31 of that document states that development at Junction 27 could cause displacement from elsewhere. What has changed to offer an alternative stance now?

4.4 **Policy S4 - Para. 2.25:** Whereas the issue of 'traveller sites' needs to be addressed it is thought that 'viability' issues may be raised by developers by not being able to sell 'market housing' adjoining such sites. This suggestion may not be practically achievable.

4.5 **Policy S6:** Experience has shown that some land set aside by developers as public open space, particularly to be used as play or sports areas are on poor quality or poorly drained land. It is considered that the policy would be enhanced by the inclusion of a suitable clause to ensure quality provision of such space.

4.6 **Policy S11:** It has been questioned as to why no figure has been shown for Tiverton in the event of an Option 2 development being adopted which could mean a reduction in requirement from Tiverton?

4.7 **Policy S14:** Most of the development proposed for Willand is outside of the recognised agreed Settlement Area so therefore later suggested sites would not appear to fit into this policy. If it is argued that the policy set out in the second paragraph at c) applies - does 300+ houses [a 20% increase] accord with the description of 'limited development'?

5. Proposed Housing Site in Willand Parish [Para 3.107].

5.1 It is intended to respond to each site individually BUT the following three facts/observations/concerns **apply to all of the following sites within Willand Parish:**

- a) None of the proposed sites is within the Willand Settlement Area and they could be argued to be contrary to proposed policy **S14.**

- b) Very strong concerns are raised as to previous experience of lack of suitable infrastructure being supplied on previous developments for various reasons/arguments. These are recorded at length in Paragraph 1.6 above. These concerns would need to be positively addressed in relation to each of these proposed sites.
- c) Proposed housing densities are shown as 40 units per hectare but Willand is a designated village and it is argued that densities should not exceed an average of 30 units per hectare.

5.2 **Quicks Farm:** A small part of this site is already designated as an exception site for 9 houses and it is understood the one landowner now owns the whole proposed site. The following concerns/observations are brought to attention for consideration:

- a) Concern has been expressed at the loss of productive agricultural land and how this is likely to affect the viability of the rented farm;
- b) Strong concerns have been expressed as to the vehicle access for the proposed development as to link into the current estate would cause access difficulties into Willand Moor Road where residents consider current junctions 'difficult'. If a new access were to be made onto the Uffculme Road [B3440] the following considerations/problems would need to be addressed:
 - Extension of the 30mph speed limit towards Uffculme to slow traffic as it is on a very straight section of road with a registered speeding enforcement problem;
 - Provision of roundabout or other traffic calming measure but this would have limitations due to the number of heavy goods vehicles using this section of road;
 - There is no pavement/footpath towards the village which would be needed for access to village facilities.
- c) No support has been stated for this extended development from those currently living on Willand Moor;
- d) If the development of this site should be approved the opportunity should be taken to extend and probably divert the Culm Valley Trail to progress this recreational facility;
- e) Willand Parish Council is **still opposed** to any further development, particularly outside of the Settlement Area, as recognised in the Options Consultation Document. A practical viewpoint is taken by Parish Council that if a site is needed for additional housing this would be the preferred site as it would incorporate the affordable housing exception site and the Settlement Area could be extended to the farm lane – provided the issues in 5.1 b) and c) were addressed.

5.3 **Land Adjacent to the B3181:** This site is already allocated as an Exception Site and a planning application is already being considered for 7 Affordable Houses on one part of the site. The issues raised by Parish Council in paragraph 5.1 apply to the rest of the site. There are no representations to remove this site from any future plan.

5.4 **Land East of M5 (off Meadow Park):** This site is adjacent to the M5 motorway on one side which runs at a slightly higher level than the land. Currently it is used for growing crops but it is appreciated that the land owner has some restrictions on its use

as it is somewhat isolated from his main operations giving rise to 'security' issues. The following concerns/observations are brought to attention for consideration:

- a) The land is relatively flat and is seen to 'hold water' when it rains and appears to have a natural drainage problem. There are some surface drainage ditches along some of the hedgerows. Local residents have raised concerns as to impact on surface water and sewage disposal on the current estate in the light of their current experiences. They suggest early specific consultation with the relevant agencies;
- b) The North/North East boundary of the land is edged by a public footpath which runs from the B3181 to the motorway boundary and into Meadow Park. This footpath is heavily used for recreational purposes, primarily by dog walkers, and is the last in the village not to be covered in tarmac/concrete. It is seen locally as a 'country walk' and if development takes place strong argument would be made for this footpath to be retained.
- c) This same boundary is edged for approximately half its length by mature protected woodland and a suitable margin would be needed as would the rest of the boundary hedge which contains mature trees.
- d) Concerns are expressed as to how suitable access would be achieved as only one obvious point is apparent without affecting the protected woodland.
- e) If this development were to be allowed it would increase the village housing stock by 9.5% and due to previous decisions there is no retail provision close by. Meadow Park is on a regular bus route.
- f) Other than the land owner, **no local support** has been put forward for this site and it **does not have the support of the Parish Council.**

5.5 **Dean Hill Road:** This site is considered to be **totally unsuitable** by the Parish Council and the local residents currently occupying Dean Hill Road – 11 properties. The following reasons are put forward in support of this view:

- a) This would create a 'satellite settlement' outside of the Village Settlement Area and be totally in conflict with the current properties which are a few houses/bungalows in a country lane. This could be argued to be open countryside and housing of this proposed density would be contrary to current planning policy;
- b) The land is currently used as a 'smallholding' operation which fits in well with the location;
- c) The M5 motorway is in a cutting on one side and the main railway line is on the opposite side and this has led to questions of land stability. Recent works to support the railway embankment have been noted;
- d) There are limited public services to the current properties – no gas, sewers or surface water drainage provision;
- e) Access/Traffic problems are of extreme concern. There is limited visibility to the right as one tries to access the B3181 due to the railway bridge and road dropping away. Increased use of the junction would be of concern. The road past the current properties in the direction of Lloyd Maunder Road is a very narrow single track road with two very tight railway bridges and a tight corner around farm buildings. This road is already being used by some as a 'back way' into Two Sisters factory site and the scrap metal business;
- f) If any development were to be allowed on this land it should only be of very low density in keeping with other properties in the road.

5.6 **Lloyd Maunder Way (Road)** This is **not considered suitable** for development for housing by the Parish Council and it is unaware of any representations/support, other than the landowner, in favour of it being so used. Parish Council are advised by some locals that they recall this site being put forward before and having been turned down by a Planning Inspector. The areas of concern, in addition to those general points listed at paragraph 5.1 above, to support the view that the site is **unsuitable for housing** development are:

- a) The site is in close proximity to the M5 motorway, the main railway line to the South West and a car park and factory subject to 24 hour operation. It is considered that this would **not be** a sustainable development;
- b) Road access for residents would be restricted by the unsuitability of Dean Hill Road [see paragraph 5.5e) above] in the Cullompton direction and the factory entrance in the direction to the Station Road/Halberton Road.
- c) Access to current facilities and public transport would require use of the motorway underpass footway;
- d) The development would be somewhat isolated from the main development of the village.

6. **Proposed Business/employment sites within Willand Parish [Para 3.111]**

6.1 **Willand Industrial Estate {Known locally as Mid Devon Business Park}**. This proposed site is accessed from Willand Parish but the majority of it is within the parish of Halberton although shown within the Willand Settlement Area. Phase 1 has been started but still has plenty of room for further development. The land allocated for Phase 2 is still green fields. Willand Parish Council has **no issues** with this being retained as a designated commercial site but raises the following points:

- a) Willand Parish Council is concerned at the slow development of this site and is concerned that its future development is being adversely affected by nearby 'farm diversification' business site development which appears to be a 'cheaper option' for users. It is also noted that the adjoining South View Industrial site at Willand has vacancies. The impact of any future development at Junction 27 gives further cause for concern;
- b) It is noted with extreme concern that current policy allows that if this site is not viably developed for commercial use it could result in application being made for even more housing which it is felt the area cannot reasonably sustain.

6.2 **Lloyd Maunder {Now Two Sisters}**: The proposal for this site to be extended goes marginally outside of the Settlement Area but at this location is not considered to adversely impact upon the village. The proposed access is an extension from provision already made onto the Halberton Road. Willand Parish Council **will support** this proposal with the following points to be considered:

- a) No development should take place which will encroach on the flood plain bearing in mind that further pressure may be put on the flood plain as the result of proposed development further up the valley;
- b) The function of the current sewage works should not be compromised;
- c) Use of the land should not aggravate current problems reported by nearby residents in relation to noise, smells or insect nuisance. The Parish Council are aware of a potential planning application for an anaerobic digester to be placed on the site to be partly fuelled by food waste from the current factory.

7. Junction 27 and Willand - S3 Option 2a {General Observations}

7.1 In plain and simple terms Willand Parish Council **do not support** any of this proposed development scheduled as **Policy J27 – Land at M5 Junction 27 and adjoining Willand**. Observations with regard to land allocated for **Commercial Development** will follow in paragraph 8. Observations with regard to land allocated for **Residential Development** will follow in paragraph 9.

7.2 Junction 27 already has difficulty coping with traffic flows and peak times of the day and certainly on Saturday mornings in the summer creating a danger by traffic backing up onto the motorway and the North Devon Link dual carriageway. It is appreciated that junction improvements and traffic lights are to be installed but it is an unknown as to whether that will cure the current problems let alone cope with the predicted vehicle movements for the proposed developments.

7.3 Junction 27 is the main gateway for road and rail traffic into the whole of Devon and Cornwall. The whole area is marketed as a 'green and pleasant land' and 'golden sands' where the beauty of the countryside and shoreline is its main selling point. Whilst appreciating that there will be arguments as to providing screening we already have the vision of the solar panels on one side and if we have large 'sheds' on the other side what sort of image will it convey? Look at Bridgewater! Welcome to the South West through an industrial site!

7.4 If this option is adopted in full or part it is considered that it will have a negative commercial impact on nearby local towns such as Cullompton, Tiverton and Wellington with potential for affecting areas further away such as Exeter and Taunton with unknown and unproven benefit, if any, to Mid Devon District. It will work against the current policy of supporting and developing the viability of town centres. There will only be the same amount of money to be spent in the area.

7.5 There will be a loss of productive farmland with the loss of local food or bio fuel production capability. The land which is not so productive is woodland or rush grassland which soaks up rainfall and slows down surface water in reaching flood prone areas further down the valley. Some of this land floods although at a higher level and the ground water is retained rather than flowing quickly down the valley. If the large area is 'concreted' over there is the potential to lose this natural barrier. Willand and Cullompton will potentially be adversely affected. Other potential and current flooding issues are yet to be addressed.

7.6 Considerable wildlife habitat will be lost. There is a small herd of deer that use the land. Water birds use the natural ponds and watercourses and the local shoot attracts and supports diverse birdlife and other wildlife. A full and detailed wildlife survey needs to be in place and available before even an outline plan is considered for approval.

7.7 The Developer has indicated intended road improvements to the A38 between Junction 27 and Waterloo Cross. Entrance to both **Commercial** sites will be from a single roundabout on this proposed newly duelled A38 road. No thought or provision had been given to the potential affect on the B3181 as yet – see paragraph 1.2 above. By encouraging

all this traffic to come to the area – parking for 4,500 cars alone – it is difficult to see how **Policy J27f)** will be relevant or achievable.

7.8 It is noted that the housing element is being separated from the commercial elements of the consultation in current considerations but it must be recognised that the original paperwork for application – which has not been amended – still refers to the whole site and includes the housing element. Enquiries to pursue this issue after recent presentations by the developers have resulted in an inconclusive ‘political’ reply.

7.9 It is appreciated that under Policy J27h) a public Masterplanning exercise will need to be undertaken but indications are that further applications in relation to this site will appear prior to the later stages of the preparation of the final Local Plan.

7.10 There is a justified concern that an outline approval will be achieved for the site and then it will be followed by a ‘dumbing down’ as the result of amendments and viability arguments.

7.11 Land ‘availability’ is an issue and although the refusal to participate by a landowner has been described as being ‘an insignificant small package of land’ if one looks at the position of that land it could be very significant – not necessarily by its size but the fact that it divides a section of the proposed development.

7.12 The proposal is a ‘ribbon’ development that cannot be called a new town but is in ‘open countryside’. It stretches for 1.8miles along the B3181 and is about 2 miles diagonally across. It is spread over three parishes and is considered by those who have made their views known in Willand as a totally unsuitable development and has no known support. One resident has welcomed an increase in employment opportunity. No justification can be found for the projection of 3,000 to 4,000 jobs being created. How many would remain once the development is completed?

8. The proposed Business/retail/leisure facility at J27

8.1 It is noted that part of this element [**Policy J27 b) 1).**] of the consultation could well be delivered earlier than the suggested period. Some of the elements on the land to the North of the A38 are already subject to planning permissions. Willand Parish Council objected to applications at the time and is likely to continue to do so with the current information available. The following points are also submitted for consideration:

- a) Reasons for objection/concern as outlined in paragraphs 7.2, 7.3, and some of 7.5, 7.6 and 7.7 also apply;
- b) No information as to the number of lorry and other vehicle movements has been forthcoming during presentations or since. This prevents judgements on potential ‘traffic’ impact’;
- c) There is spare capacity on industrial/employment land sites within Willand and on farm diversification land close to the Willand Parish boundary in Halberton Parish. These could be even more adversely affected by additional such sites close by.
- d) It is appreciated that argument will be made that the proposed developments will be different and cater for larger distributors and different types of business but these

explanations are not supported by detail at present. Do we want a 'Bridgwater' at Junction 27?

8.2 The area of **Policy J27 b) 2) to 10)** inclusive lacks detail and questions are raised as to its viability. Different answers were given by the potential developers at different locations of presentations. The following points are offered to support these views:

a) In November 2013 a press release was issued by MDDC where the Leader was quoted enthusiastically FOR the development and one of the 'attractions' was to be a "Prestige Automotive Development". There is no sign of this development in the Options Consultation!

b) **b) 2)** refers to an outdoor leisure destination. All the information we have to date is that 'it will be exciting and possibly water based'. Visitor attractions which already exist in the area do not report overwhelming support.

c) **b) 3) & 4)** refers to a designer outlet/village & Devon produce promoting centre – will this not have a negative impact on our existing town centres and similar facilities within reasonable travelling distance?

d) **b) 5)** refers to sport and activity centre with retail. There are such areas already available within acceptable driving distance and with lack of further detail a comparison is difficult.

e) **b) 6)** refers to a plant/horticultural centre. Is this needed or viable when there is already a large expanding garden centre at Waterloo Cross and another at Leonard Moor Cross – both have cafes/tea rooms?

f) **b) 7)** refers to a cinema. Willand Parish Council was advised by the developer that at present no operator had been found.

g) **b) 8)** refers to a motorway service area etc. Such a facility already exists on site but mainly for car occupants. No figures could be given at the presentation, or since, as to how many lorry and coach parking spaces would be provided. There are already large motorway service areas at Taunton Deane and Exeter and a good facility at J28 Cullompton. Is there a justification for more in such close proximity?

h) **b) 9)** refers to a hotel, conference venue and concert hall. There is already a 'hotel' on site. Further hotels are available at Taunton, Exeter and Tiverton and all have conference facilities. Is there a justification for more? Is there a need for a concert hall at this somewhat remote location when similar facilities at Exeter and Taunton and further afield are experiencing difficulties?

8.3 Without a lot more information accompanied by professional needs and viability assessments for the proposals there is a danger of enthusiasm for 'something spectacular' at Junction 27 to leave the area with a potential white elephant and/or further devastation of our local town centres.

9. Policy S3 Option 2a – New settlement between Willand and Junction 27.

9.1 This option has **no known support** within Willand Parish and **considerable opposition**. It is appreciated that at this stage there is no detail other than a potential for 3,000 dwellings with 35% affordable housing. It is appreciated that infrastructure and availability of provision will all have to be dealt with via a public Masterplanning exercise.

9.2 This is a 'ribbon' development spread over a narrow area of at least 1.1 miles between the B3181 and the M5 motorway. It is difficult to envisage a viable central focal point for a community particularly if it is seen as an extension of Willand to which it will become attached.

9.2 It is known that Cullompton Town Council is in favour of Option 2b which would see a new development to the East of the town. There has been dialogue between the two Councils and Willand fully support the Cullompton Town Council position. Their view regarding provision of employment land near to where people live is also supported.

9.3 The perceived traffic difficulties surrounding Junction 28 and Cullompton are noted as are the indications in the Options Consultation to appear to steer a decision towards Junction 27 development. The cost implications and the need to recover them from the development should not be a reason for a bad decision to put a major development where it is not wanted or needed when another location can justify expansion.

9.4 **S3 Option 1 is the preferred option of Willand Parish.**

10. Conclusion

10.1 The position of Willand Parish Council has been taken from their own knowledge and observations together with local feedback as the result of consultation with parishioners. The Parish Council will readily expand on any points if required.

10.2 Recommendations and observations are contained under each listed heading and cross referenced as necessary.

