

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



Sally Parish
Asset Manager
Highways Agency
Ash House
Falcon Road
Sowton Ind. Estate
Exeter
EX2 7LB

Via email: planningconsultations@middevon.gov.uk

Direct Line:

24 March 2014

Dear Sir/Madam

MID DEVON DISTRICT COUNCIL LOCAL PLAN REVIEW OPTIONS CONSULTATION

The Highways Agency (HA) would like to thank you for the opportunity to comment on the emerging Local Plan Review Development Plan Document (DPD) which is being prepared by Mid Devon District Council (MDDC). The Highways Agency has worked alongside Devon County Council (DCC) in preparing our response.

The document proposes three different options for growth in Mid Devon, and we are keen to work together with MDDC to develop an evidence base which identifies the opportunities, potential constraints and mitigation measures for each of the options proposed. We are also 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 potential sites.

Both the HA and DCC are keen to assist in identifying the needs for strategic infrastructure that will arise as a result of the development allocated in the final version of the Local Plan.

In terms of transport there is need for the HA to work with DCC and MDDC on the options for development around the M5 Motorway. DCC have begun the initial phase of the work in terms of developing models, identifying constraints and options. This work will be undertaken collaboratively between the HA and DCC and initial meetings have taken place. We are keen to pursue collaborative working between ourselves, DCC and MDDC and will liaise in future to ensure this progresses.

Policy S9 Infrastructure

The HA generally supports the principles of this policy. It is imperative that new development is served by the appropriate infrastructure, and that its provision is in step with development. It is also important, where possible to guide development to places where capacity exists on the SRN. All development likely to produce significant amounts of transport movement will need to be accompanied by a robust transport evidence base, including measures to mitigate any unacceptable impacts on the SRN that the development is likely to cause.

In terms of the Local Plan and the identification of necessary infrastructure to support it, the HA's policy is that this should be done at the Local Plan stage (DfT Circular 02/2013 para 18). The detailed requirements in relation to the appropriate level of assessment are set out in the Agency's Spatial Planning Advice Note : SP 09/09 : Local Plans – Evaluating Transport Impacts.

Tiverton.

The HA notes the intention to continue to develop Tiverton as a medium sized market town, maintaining its status as the largest urban area in Mid Devon and increasing the self sufficiency of the town. This will help to reduce trips on the SRN. Being Mid Devon's largest settlement with the biggest concentration of social and commercial services and a reasonable level of transport provision, it makes sense for Tiverton to be the main focus for new development, as it is the most sustainable. We do however note the long term growth constraints due to topography, flood plains and the position of the A361.

Expansion to the east in the form of an urban extension is identified, as indeed it was in the previous August 2013 consultation, as well as several other existing allocations. There is a Devon County Council proposal to improve the capacity at Junction 27 which will be shortly coming forward which takes account of these current allocations. There are however a few options that are being considered that are not allocated and if they were to come to fruition, then the ability of Junction 27 and the M5 to adequately accommodate the resulting traffic demands will need to be re-assessed as part of the evidence base for the Local Plan. The potential new community to the east of Junction 27 would be a particular concern in this respect and is dealt with separately later in this response. Specific comments on options not currently allocated are as follows:

- Hartnoll Farm is a potential extension of the existing allocated eastern urban extension, comprising 1,100 dwellings. The requirements for this will depend on the results of the SHMA, and which option the Council chooses to pursue (Strategic Options 1 or 2), but if it is considered to be required the Council will need to work alongside the Agency and Devon County Council to consider the impacts this will have on infrastructure requirements, and the transport evidence base of the Local Plan will need to be revisited to take account of this.
- There are several other smaller sites suggested as options, comprising residential, commercial and mixed use. Each will require a robust transport evidence base to be included in the Local Plan to provide a more sustainable overarching approach to infrastructure mitigation.

Cullompton

The HA acknowledges the intent to continue to develop Cullompton as a small, growing market town and that improvements will be made to services for its residents and for those in nearby rural areas. This will assist in reducing the need to travel.

We support the promotion of further public transport improvements within Cullompton and to other urban areas and to improve access to the rail network. This will assist in reducing pressure on the SRN.

We are aware that the current Local Plan allocates sufficient sites to meet housing need to 2026 with long term growth in NW Cullompton comprising 1,100 homes and 40,000sqm employment

floorspace currently at the preliminary masterplanning stage, with a resolution to grant planning consent.

From the HA's perspective the performance of M5 Junction 28 is key to development here, and we welcome that the document acknowledges the importance of being able to upgrade this junction in order to maintain the integrity of planned expansion. DCC will shortly be undertaking improvements to this junction. This is a scheme that takes into account existing Local Plan allocations, and in many cases specific discussions have been undertaken in relation to these. Developments over and above current allocations may mean that in future further improvements to Junction 28 and the M5 may be required. The Eastern Relief Road, an existing allocation is also referenced, and is integral to the existing development strategy for Cullompton and will have been taken into account when assessing the mitigation required to deliver the current allocated sites.

In terms of the most significant new options put forward for Cullompton, the HA welcomes the intention to ensure that transport provision is made to ensure that there is appropriate accessibility for all modes and that a suitable phasing strategy for sites is agreed to ensure that development and infrastructure are in step.

- **Grown Farm, an extension to the NW extension is proposed as an option, a significant addition of 400 dwellings. If this is taken forward then it is important that the infrastructure necessary to accommodate its transport demands are identified in the Local Plan. This may require an upgrade of existing infrastructure or an extension of planned infrastructure upgrades. A requirement to deliver or contribute towards necessary infrastructure should be brought out in the wording of Policy CU2.**
- **Smaller option sites will also need to be supported by a robust transport evidence base and the cumulative impact of each taken into account when determining the infrastructure requirements of the Local Plan.**
- **East Cullompton Urban Extension to the east of M5 Junction 28, would comprise a very significant mixed use development including 3,000 dwellings and 54,000 sqm of commercial floorspace. We acknowledge that the preference is to retain the current development strategy but that this cannot continue indefinitely and either a new community here or at Junction 27 is likely to be required. Assuming an overarching mitigation strategy can be identified within the Local Plan to ensure that the strategic function of the M5 is not compromised then the HA would have no objection to this approach.**
- **Cullompton Infrastructure – It is encouraging that infrastructure is identified separately to help deliver the required development targets. As mentioned the Eastern Relief Road is considered fundamental in delivering growth in the town. Improvements to increase the capacity of Junction 28 will shortly be put in place. Should development not already allocated come forward through the Local Plan, then the infrastructure requirements of the additional allocations and the mechanisms to deliver it will need to be identified. This could be through the CIL or by the use of a planning obligation to mitigate any impact.**

We note that Cullompton Town Council is in the early stages of producing a neighbourhood plan. Some sites in Cullompton may be excluded from the Local Plan at a later stage if they are going to be allocated through a neighbourhood plan instead.

Site Allocations Crediton

The HA acknowledges the intention to continue to develop Crediton as a small vibrant market town. Expanding employment opportunities and improving the quality of existing retail provision within the town will help to reduce the need to travel.

We note that there is an under provision of housing currently which will need to be addressed, which the SMHA should help to inform this when it's finished.

There is a limited range of new housing sites around the town, and some commercial sites to the SE of the town which have been identified, but we note that the topography of Crediton limits the amount of development that could be accommodated without significant landscape and visual impacts.

The location of Crediton is such that development in this location is less likely to directly impact on the SRN than either Tiverton or Cullompton. With this in mind DCC may be more concerned about the location of sites than the HA, as it is the local highway network which will be more affected. That said, this should be confirmed in the Local Plan and any developments coming forward in the town will need to be accompanied by a robust transport evidence base to show the extent of impacts on the network, and to provide mitigation proposals as necessary.

Villages/Countryside

A few rural communities have expressed a wish to see allocated land for housing. We note that this will be taken on board when decisions about preferred sites are taken later in the year as the sites identified far outweighs the number of dwellings required in rural areas.

Given the likely size of development in the villages and countryside of Mid Devon the HA has no specific comments to make.

Junction 27 and Willand

The HA generally considers the new community approach to meeting the growth targets in Mid Devon as an acceptable one, providing a holistic approach is taken when considered in the context of the SRN, by incorporating the correct infrastructure within the Local Plan as an overall solution.

A new community at this location would need an extensive transport evidence base to support it and mitigation identified to ensure accessibility for all modes. It is important to ensure that adequate facilities are located on site to reduce the need to travel. Given the proximity to Tiverton Parkway railway station a pedestrian and cycle route would be required as well as improvements to M5 Junction 27 to ensure that the strategic function of the M5 is not compromised.

Managing Development

The HA has no comment to make in relation to the Development Management Policies in the Options Consultation document. All policies relating to development, transport, infrastructure provision and other issues likely to affect the SRN are contained within the Development Management Policies document, adopted in October 2013.

Conclusions

As iterated throughout this response, capacity enhancements and infrastructure required to support strategic growth should be identified at the Local Plan stage. This provides the best opportunity to consider development aspirations alongside associated strategic infrastructure needs. This is set out in DfT Circular 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development".

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

We would again like to thank Mid Devon District Council for the opportunity to comment on the developing growth strategy for Mid Devon. We look forward to what we hope will be a collaborative period of joint working over the coming months.

Yours sincerely



 Gary Pansh
NDD South West - Asset Development
Email:

Our ref: Mid Devon LDF
Your ref: LP Review/3

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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:

18 March 2014

Via email: planningconsultations@middevon.gov.uk



Dear Sir/Madam

Local Plan Review: Duty to Cooperate and Options Stage consultation – March 2014

Thank you for providing the Highways Agency with the opportunity to comment on the above document. The Agency has provided a number of responses to Local Plan consultation opportunities, including in relation to the Scoping Report in August 2013, and this letter should be read in conjunction with these previous representations. We understand that the new Plan is expected to be adopted in May 2015, and that this Options consultation is the second stage containing more detailed options for the direction of development and site allocations than the August 2013 response related to.

The Agency is responsible for operating, maintaining and improving the Strategic Road Network (SRN), and in Mid Devon this 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 potential sites. Our comments on the parts of the documents which are relevant in this context to the Highways Agency are as follows:

Development Strategy

It is estimated that to 2033 there is a requirement for 8,400 dwellings and 154,000sqm commercial floor space in the District. The Strategic Housing Market Assessment has not yet been completed, although it is currently underway. Once this is finished the target will be amended.

The document proposes 2 strategic options:

1. Town focus, continuing to focus development in the three main towns, with the largest land allocations being in Tiverton.
2. New community approach, directing long term growth to a new community. This would take the form of Option 2a at M5 Junction 27 and Willand or Option 2b at M5 Junction 28 at Cullumpton. If this is taken forward, housing development wouldn't be until after 2026, or the

completion of 5,460 dwellings elsewhere, whichever is sooner. Crediton and Tiverton are constrained in terms of finding suitable sites well related to the main town.

Any proposed new community would require the cooperation of landowners, several stages of consultation, and partnership working on infrastructure delivery. Option 2 allows for a long lead in time without the entire strategy for the Local Plan resting on it. If the option for a new community is taken forward but within five years of the plan being adopted there are no signs of long term commitment to the development, such as infrastructure planning or the intention to produce a masterplan, then the Local Plan will be reviewed.

Land for commercial use being promoted at Junction 27 is likely to be deliverable earlier in the period if allocated. The Agency notes the Council's acknowledgement that impacts on the SRN must be carefully considered and that it has a duty to cooperate with us amongst others. DfT Circular 2/2013 states that *"In order to develop a robust transport evidence base, the Agency will work with the local authority to understand the transport implications of development options"*, so it is very much a two way process.

Generally whatever option is taken forward, where employment allocations are proposed these are intended to come forward in step with housing development to provide sustainable patterns of growth.

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the ability of Junction 27 and the M5 to adequately accommodate the resulting traffic demands will need to be re-assessed as part of the evidence base for the Local Plan. The potential new community to the east of Junction 27 would be a particular concern in this respect and is dealt with separately later in this response. Specific comments on options not currently allocated are as follows:

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The Agency reiterates that these comments do not prejudice any future responses on site specific matters and would request that we are 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 on.

Yours faithfully,

Sally Parish
NDD South West Asset Development
Email: sally.parish@highways.gov.uk

cc: Chris Harding, Halcrow
Nigel Dyson, Highways Agency

