

## MID DEVON CPRE GROUP

Secretary: Mrs. Julie Rudge,  
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Treasurer: Mr. P.J. McDouall,  
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To: Mr. Peter Williams,  
'Local Plan Review',  
Forward Planning,  
Mid Devon District Council,  
Phoenix House,  
Phoenix Lane,  
Tiverton EX16 6PP



18th March 2014

Dear Mr. Williams,

- Mid Devon District Council (MDDC): Local Plan Review - Options Consultation.

The Mid Devon CPRE Group Committee discussed the Options Consultation for the Local Plan Review at our last meeting and the Group Committee asked me as secretary to send you the representations for the above as agreed by the Committee.

I am enclosing the representations relating to the Policies coming forward except for the Site Allocations section which I hope to send you as soon as possible. I would like to congratulate your group on a very comprehensible document and to say that I found the display for the Local Plan Review held at Crediton very informative and helpful.

Yours sincerely,

Mrs. Julie Rudge,  
Secretary for the Mid Devon CPRE Group.

Copies of CPRE's comments to members of the Mid Devon CPRE Group.

- 1) – Do you agree with the Vision and Spatial Strategy? – Yes.
- 2) – Draft Policies S1 and S2 set out the Council's approach and priorities for sustainable development: What is your opinion about these policies? – CPRE Supports.  
Specific comments from CPRE: –
  - S1: an additional proviso to S1 following those documented as (a) & (b) that states: "the opinions of local residents should be considered where material considerations are identified that negate development proceedings."
  - S2: Para. (l) regarding Protection of Conservation Areas, CPRE would like added after " . . . historic character of Mid Devon's landscapes and townscapes" the words "including Conservation areas." Reason: for clarification and extra protection.
- 3) – 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 size 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 towns up to 2033. CPRE supports this and to use whenever possible brown field sites. To avoid building on best and most fertile agricultural land, Grades I, II and IIIa in line with NPPF, Section 11, Conserving and enhancing the natural environment para. 26.
- 4) – If the Council chooses to pursue Option 2 under Policy S3 (the new community option), which location would you prefer and why?
  - CPRE prefers Option 2(b) – East Cullompton (east of Junction 28).  
Reasons: The above is close to Cullompton Town itself so it could support the town's viability and vitality. In fact it could encourage the re-vitalisation of the town in line with Policy Cor 1c.. People living in existing developments would not have far to travel so it would be sustainable in line with Cor 1e. It has close links with the M5 and there is the possibility of close rail links.
  - CPRE strongly objects to development at Junction 27 and adjoining Willand. Reason: It would be damaging to Tiverton town's viability, its vitality and economic well-being. Junction 27 and its junction with the North Devon Link Road, the A361, is the important green gateway to Mid Devon as a green tourist area. Further reasons for objection are given under Site Allocations.
- 5) – 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?
  - CPRE partly supports but would like brown field sites to be used first. CPRE supports the ratio of 35% Affordable to market Housing. CPRE has noted that under the Tiverton Eastern Urban expansion doubt was expressed as to whether there was a need for such housing numbers which have therefore been reduced. CPRE is therefore concerned that there may be an over estimation in the amount of housing development in the Mid Devon District. There are areas which have not been used e.g. Copplestone, the Old Abbatior site and in Crediton, the site near Tesco's, CRE15 (c) which has been available for a very long time.

Continuation of 5, S6 – Public Open Space: CPRE very much supports this.

6) – Policies S7–S9. 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?

– Other: Regarding S7, rather than focusing on developing employment parks along the M5 corridor, CPRE believes it would be preferable to make effective use of those under-utilised parks that already exist (e.g. Ethmar Court, Four Cross Avenue, Willand and at Coppleshone, the Old Abbatoir site which was originally designated as a small industrial complex and next to the A377. There is also the Coppleshone Mills site which is currently for sale adjacent to the A377)  
– S8: Town Centres: CPRE very much supports this. –S9 Infrastructure: CPRE supports this.

7) – S10: the Environment: Policy S10 seeks to sustain the quality of Mid Devon's environmental assets and minimise the effects on climate change.

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

– CPRE very much supports the Policy and has two suggestions for improvement:–

– (a) S10 d – Renewable energy development. CPRE believes that the wording of the existing LP3 Policy DM5 ". . . significant adverse impact on the character, amenity and visual quality of the area. . ." offers a stronger protection of the countryside and quality of life of local people rather than the wording of S10 (d) "acceptable local impact, including visual, on nearby residents, landscape character. . ." etc. In rural areas a nearby resident can often be only the farm owner, who would profit from the development. This can exclude residents, although some distance away but who can suffer adverse impact due to noise and visual intrusion. The wording in S10 (d) is weak and open to misinterpretation. To retain the wording of DM5 is clearer and concise in its purpose. The word "amenity" is also important to retain as this would apply to the public using local roads on foot, riding or cycling or public rights of way in the vicinity of a renewable energy proposal.

b) – S10(g). CPRE would like to have added to the end of para.S10(g) – after the words ". . . features of recognised national and local importance" the additional wording "including Conservation areas." Reason: added protection for such areas.

8) – Policies S11 – S15. These 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?

– CPRE supports these policies and welcomes the mention of cycling and walking for Tiverton, S11(b) and Cullompton S12(a) but wonders why this has not come forward for Crediton S13 although it is realised there may be constraints in Crediton. CPRE also supports and welcomes S11 and S12(e) and 13(d) "Enhance the tourism and visitor role of the town and surrounding area".

9) Site Allocations:– To be responded to by CPRE where relevant and sent separately to the above.

10) Matters relating to the Adopted Management Local Plan (LP3). CPRE has read the pages 102–107 and finds the explanations about amendments or new policies satisfactory.

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To: Mr. Peter Williams,  
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Forward Planning,  
Mid Devon District Council,  
Phoenix House,  
Phoenix Lane,  
Tiverton EX16 6PP



21st March 2014

Dear Mr. Williams,

- Mid Devon District Council (MDDC) Local Plan Review - Options Consultation.

I am writing to you as the secretary of the Mid Devon CPRE Group to send you further representations to my letter sent to you dated 18th March 2014 enclosing representations relating to the Policies. The enclosed comments relate to specific Site Allocations which have come forward under the above Local Plan Review.

Yours sincerely,

Mrs. Julie Rudge.  
Secretary for the Mid Devon CPRE Group.

Copies of CPRE's comments to members of the Mid Devon CPRE Group Committee.

Mid Devon CPRE Group – Mrs. Julie Rudge, secretary.

Address: Frost Cottage, Morchard Bishop, Crediton EX17 6SE.

Comments on MDDC's Local Plan Review – Options Consultation (Jan. 2014) – March 20th 2014

Site Allocations – Junction 27 and Willand.

– CPRE objects to the above proposal for the following reasons:–

- a) – While it is appreciated that this proposed development would not come forward until later in the Local Plan 2015–2033 nonetheless CPRE believes that such a large scale development would have a detrimental effect on the viability, the vitality and economic well-being of Tiverton itself as the site is comparatively close to Tiverton and especially if the site as proposed has a hotel, "major outdoor and leisure attractions", a cinema, restaurants, and cafes etc.
- b) – Tourism and the Economy: Devon is an important Tourist destination for many people who wish to enjoy the rich and varied Devon countryside which includes the Mid Devon landscape. As a green gateway to Mid Devon and further on to North Devon along the North Devon Link Road, the A361, the site at Junction 27 if developed as proposed would be counter productive to people's perception of what is offered in the area. The area is part of the approaches to Mid Devon and the site's development, CPRE believes, would have a detrimental effect on Tourism with its economic benefits. CPRE therefore considers that the development would be contrary to the emerging Local Plan Policy S11(e) which aims to "enhance the tourism and visitor role of the town (Tiverton) and the surrounding area."
- c) – Land Quality: The proposed site would mean the loss of high quality agricultural land, Grades 1 & 2. There is an ever increasing need for local produce to ensure sustainable security of food supply to reduce the Country's dependence on foreign imports. Once built over especially such a large area, this fine agricultural land would be lost forever to unsightly commercial and housing sprawl as has happened at so many motorway junctions. CPRE therefore believes that the proposal is contrary to the NPPF's Section 11 "Conserving and enhancing the natural environment", para.112, p.26, which refers to the best and most versatile agricultural land etc. The landscape is important in its own right and its local distinctiveness with its rich red soils is appreciated by visitors and local people alike.
- d) The proposal would cause ribbon development absorbing Willand and leading onto Cullompton as the latter expands in its present form. There are concerns that this could eventually lead to a large urban conurbation proliferating along the M5 corridor towards East Devon's new town of Cranbrook.
- e) – Transport and Traffic: Concerns have been expressed over the years which includes the Highways Agency about Junction 27 and its capacity, or lack of, to cope with the extra traffic levels at peak times. Such a development would require major extensive road works to cope with the extra traffic generated by such a large development. It would also be unsustainable as people would be encouraged to travel to the area by car both from Tiverton and elsewhere to either work or use the facilities. The rail station is some distance away and on the other side of Junction 27 and its proposed development thereby encouraging people to access the railway by car. CPRE believes that this is unsustainable and therefore contrary to MDDC's Core Strategy Policy COR 1 (e) which aims to provide accessible forms of development "that reduce the need to travel by car".

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Comments on MDDC's Local Plan Review – Options Consultation(Jan. 2014) – March 20th 2014

Site Allocations – Tiverton: Policy TIV2 – Hartnolls Farm.

– CPRE objects to the above proposed development Policy for the following reasons:–

- a) – Landscape: The proposal would lead to an adverse development in the open countryside which, coupled with the ongoing Tiverton Eastern Urban Expansion, would have a cumulative development impact over an exceedingly large area of countryside important to and much valued by those who live in the area as well as by visitors. CPRE therefore believes that the proposed development is contrary to MDDC's Core Strategy COR 2(c) – Local Distinctiveness which refers to ". . the preservation and enhancement of Mid Devon's natural landscape. .etc. and also COR 2(e) ". . the protection of . . areas and features of national and local importance." (My underlining).
- b) – Tourism and the Economy: The site is bordered by the Tiverton Grand Western Canal to the south and east which has panoramic views over the area which would be lost to both tourists and local people alike when cycling and walking along the Canal. The Tiverton Canal, a designated Wildlife Site and Conservation area in its own right is a valuable resource for Tourism and leisure activities attracting many people to the area and their valuable contribution to the local economy. The proposal therefore, CPRE believes, would jeopardise Tourism and the economy as people's enjoyment of the area would be adversely affected both from the visual and wildlife aspects. CPRE therefore considers that the proposal would be further contrary to Policy COR 2(d) which refers to the protection and enhancement of ". . designated sites of national and local biodiversity. . ." as well as ". .of national and local importance."
- c) – Land Quality: The proposed site would mean the loss of high quality agricultural land, Grades 1 & 2. There is an ever increasing need for local produce to ensure sustainable security of food supply to reduce the Country's dependence on foreign imports. Land resources are finite. Once built over, this fine agricultural land would be lost forever. CPRE therefore believes that the proposal is contrary to the NPPF's Section 11 "Conserving and enhancing the natural environment", para.112, p.26, which refers to the best and most versatile agricultural land etc.
- d) – Traffic and Transport: Such a large development would have an adverse affect by increasing the amount of traffic along roads which to the east are narrow winding lanes through Halberton and Sampford Peverell, especially the narrow bridge over the Canal, while to the west there would be problems along Blundells Rd. past the important school and for the residents in the area. Although a junction to the A361 is proposed there is no guarantee that traffic will necessarily use this link as people will look for alternative routes.

Mid Devon CPRE Group – Mrs. Julie Rudge, secretary.

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Comments on MDDC's Local Plan Review – Options Consultation (Jan. 2014) – March 21st 2014

Site Allocations – Morchard Bishop: Policies Map Options – shown as Church Street.

– CPRE objects to the above proposed development for the following reasons:–

- a) – Landscape and Conservation Area: The development proposal would be detrimental to the setting of Morchard Bishop's Conservation Area which includes the listed cottages in Church St. which back onto the site, the Victorian Village School and the nearby mediaeval St. Mary's Church, Grade I listed. The site area was accepted as being important in the Mid Devon Local Plan 1998 which states on p.63. para. 38.8, "The landscape setting of Morchard Bishop, including the area between Church Street and Rectory Gardens, is an integral part of the overall character of the settlement. It provides the context for, and is a prime element in the appearance of the village." This statement is equally valid to-day and the proposed development would have an adverse affect on this integral part of the village and its character.
- b) – Traffic: Such a large development would cause extra traffic through the village and down to Morchard Road, a road recognised as being sub standard and having a steady increase in traffic over the years. The village is 8 miles from Crediton and 18 miles from Exeter so people would be travelling distances to work by car. Although there is public transport, a bus, this is notably under-used and the railway which is only a request stop is 2½ miles away.
- c) – Housing Need: A survey for Affordable Housing need was carried out a while ago. This demonstrated that only 2 families, who have since moved, required affordable housing. The existing Affordable Housing allocation site for Morchard Bishop west of Greenaway, marked A on the Local Plan Review Policies Map – Options for Morchard Bishop has never been developed thereby demonstrating a lack of need for further housing development in the village. Houses for sale and lettings are available in Morchard Bishop village on a regular basis showing that there is an on-going supply of housing availability.
- d)– Drainage: CPRE further objects because of the sloping nature of the site and the potential water run-off towards the existing development of Rectory Gardens which could be adversely affected by such problems. There is an underground stream which runs along the Old Rectory Gardens, then passes through the north of Corner Close and onwards to the Chulmleigh Road further north east in the village where flooding has already occurred at times. This problem could be further increased by the proposed development behind Old Rectory Gardens.
- e) – The Public Footpath: There is an important public footpath, Morchard Bishop FP.no.64, which links Church Street Road to Rectory Gardens. The footpath dissects the site. It is a much enjoyed village amenity, with extensive views towards Lapford village which would be lost if the site were developed. The proposed development would have a detrimental affect altering the country character of the footpath irretrievably. Public Rights of Way are a material consideration regarding Planning matters, as is stated in Devon County Council's Rights of Way Improvement Plan (ROWIP), p.34, PL1A which requires their protection, PL1B, a holding objection, and PL1C, further regarding new development.

The Mid Devon CPRE Group – Mrs. Julie Rudge, secretary.

Address: Frost Cottage, Morchard Bishop, Crediton EX17 6SE.

Comments on MDDC's Local Plan Review – Options Consultation (Jan. 2014) – March 21st 2014

Site Allocations – Morchard Bishop: Policies Map Options – Tatepath Farm, north of Morchard Bishop. – CPRE objects to the above proposed development for the following reasons:-

- a) – Traffic: The road leading to the site is mainly a single track road with few passing places with a narrow bend. It therefore could not accommodate the increase in extra traffic especially as there are already traffic problems when there are functions and activities at the nearby Playing Fields during the day time as well as there being evening functions at the sports club.
  - Further to the above there would be a detrimental affect on the children's nearby village play area with traffic hazards due to the increase in traffic with such a development.
  
- b) – Housing Need: A survey for Affordable Housing need was carried out a while ago in the village. This demonstrated that only 2 families, who have since moved, required affordable housing. The existing Affordable Housing allocation site for Morchard Bishop west of Greenaway, marked A on the Local Plan Review Policies Map – Options for Morchard Bishop, has never been developed thereby demonstrating a lack of need for further housing development in the village. Houses for sale and lettings are available in Morchard Bishop on a regular basis showing that there is an on-going supply of housing available.
  
- c) – The Site Plan: The site plan as shown on the Policies Map includes the access road which leads both to the Bowling Green, an important village amenity, and also the public footpath, Morchard Bishop FP.no.62. CPRE believes that the site plan line should be amended on its east side to leave access to these areas free from any development encroachment. Public Rights of Way are a material consideration regarding Planning matters as is stated in Devon County Council's Rights of Way Improvement Plan (the ROWIP), p.34, PL1A which requires their protection, PL1B, a holding objection, and PL1C, further regarding new development.

Both this site allocation as well as the proposed Church Street site allocation are outside the settlement line of Morchard Bishop and CPRE would like to see the settlement line to remain as it is in Morchard Bishop. Reason: To protect the Conservation area and retain the surrounding open countryside setting for the above and for future generations of those who live in Morchard bishop.



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Comments on MDDC's Local Plan Review – Options Consultation(Jan. 2014) – March 21st 2014.

Site Allocations – Morrells Farm: Mixed use Consultation Site.

– CPRE asks that Morrells Farm should be removed from the list of sites for consideration at Sampford Peverell and objects to it as a site for the following reasons:-

- a) –The site is almost completely surrounded by land which has been identified as a flood plain (delineation made before the extremes of the winter 2013–2014).
- b) –This land also borders J27 of the M5 and would effectively be a development of J27 – a proposal that has been successfully and repeatedly resisted for valid reasons from well before 1982 which included being called in by the Government and refused on valid grounds. There would be a risk of cumulative impact if Junction 27 were to be developed which would also have major impact traffic problems at Junction 27.
- c) –There are numerous vacant sites for business premises at Ethmar Court, Four Cross Avenue, Willand. Also a series of storage structures etc. are appearing almost by stealth along the left-hand side of the B3281 between Waterloo Cross and Willand.