

ACM

Sandra Hutchings

From: Jeremy Riches
Sent: 22 March 2014 15:31
To: DPD
Subject: Consultation of Mid Devon Local Plan Review to 2033

Importance: High

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For the attention of: Mid Devon Planning Department

Reference: Consultation of Mid Devon Local Plan Review to 2033



Dear Sirs,

We hereby via this letter wish to provide our views into the consultation process for the mid Devon local plan review. We assume that the consultation process is genuine and will take into account the strong views held locally, against the development proposals for Willand and the J27 proposals.

Willand has over the years grown substantially, and taken on more than its fair share of development. Designated as a village, Willand has in our view grown to its maximum size, with very limited amenities available – this is acknowledged in the planning review: “Willand has expanded greatly in recent years because of its proximity to the motorway, but has few services”.

Affordable Housing schemes have already been identified in the current plan – and therefore along with the above observation, Willand should be exempt from yet further expansion.

We believe the local plan review has a number of fundamental flaws which should be thoroughly explored during the next phase of review:

- The review currently lacks a detailed evaluation of potentially under-utilized or derelict brown field sites, especially with regard to Willand and surrounding areas.... we believe this is ecologically unsound, with the identified potential sites being green-field / prime agricultural land.
- Identification of development opportunities and sites within existing settlement boundaries has not been fully investigated within the review document.
- The document does not provide detailed evidence for the need for the scale of development proposed. We believe that previous policy from MDDC has centered around “Local Development meeting Local Needs” for

Willand. This consultation document neither takes into account this policy, nor has factored in local views or requirements.

- The wider aspect of the various proposals with neighbouring authorities has not been taken into account within the plan. We note feedback provided to MDDC from other authorities which highlight this – for example taking into account the developments around Exeter such as Cranbrook.
- We also note that the lack of publicity surrounding this review has resulted in the majority of people in Willand only becoming aware of these proposals over the last 3-4 weeks following a circular from the Parish Council. We believe that because of the potential scale and impact of the proposals this consultation process itself has been seriously flawed by not giving sufficient time for the local population to properly debate and review proposals in detail. Even at this outline planning stage we believe there has been a failure to properly consult the population of Willand, and god forbid if these proposals were to proceed any further, the population of Willand will insist on full, detailed and lengthy consultation on every single aspect proposed.

Our concerns and feedback relate to the proposals for Willand and surrounding areas and are detailed below:

Quick's Farm Proposal, Willand

We strongly object to this potential development site for the following key reasons.

- ***The Site is clearly outside of the Village Settlement Limit***

Policy S14 states: The following rural settlements will be designated as villages suitable for limited development: Bampton Willand, and Yeoford. Development will be limited to within their defined settlement limits and to allocations for (a) small scale housing, employment, tourism and leisure, (b) Services and facilities serving the locality, and (c) other limited development which enhances community vitality or meets a local social or economic need."

- The site is outside of the settlement limit
- The proposed development is for 68 houses and is therefore not small scale for a village
- Willand does not have the amenities to support the additional development
- Identification of any development sites within the settlement limit have not been considered
- There are no services/facilities serving the locality proposed
- There is no local social or economic need reason – proposals for limited affordable housing have already been put forward, without the need for additional market value development.

We would expect MDDC to clarify how the proposed site fits in with the above policy.

We strongly oppose any development in Willand outside of the existing settlement limit.

- ***Poor access to the Site from the Uffculme Road***

The access point from the current Quick's Farm lane has poor visibility and is onto fast moving traffic which poses credible safety risks.

- ***No viable access to the site from within the existing Willand Moor estate***

- The proposed development of 68 properties would result in 100+ cars (realistically most families have more than one car, especially being a rural location).
- The estate roads closest to the proposed site are designed for very light traffic use and in places are single track with no pavements – children, elderly people and other pedestrians use the roadway to walk through the streets. The access point near Buttercup Road passes a play area, and the access point into Harebell road has a tight and dangerous corner.
- Any attempted access would cause destruction to hedgerow and the Devon bank bordering the field.

Any attempt to put access through would have a serious risk to safety for local residents, including children and the elderly.

Simply put, the current estate roads are not even remotely suitable for additional traffic and therefore there is no viable access route from the existing estate roads.

- ***Loss of prime agricultural land***

- The site immediately adjoins Quick's Farm – we believe this field to be of high importance to the success and viability of the farm, and the loss of the field would have a major negative impact to the farm business.

- ***Suitability of location adjacent to farm***

- We strongly question the suitability of the location, next to a working farm. Not only are there the dangers of the working farm for future residents on the development (such as farm machinery using the access road), but also impacts of flies, smells, and noise, making this an unattractive location.

- ***Ecology – Bats, Owls, Field Fares, Red Wings and other wildlife***

- Being in close proximity to the farm and farm buildings there is a haven for wildlife.
- Bats (a protected species) regularly fly over the Site - we believe they would be impacted along with their flight paths.
- Foxes can be regularly seen in the field, along with a wealth of different birds.
- We have heard of reports of Red Wings frequenting the field, which we believe has a RED conservations status from the RSPB
- Slow worms have also occasionally been seen near the Devon bank

We would expect MDDC to take its responsibilities towards ecology extremely seriously and if proposals for Quick's farm proceed to the next stage, then we would expect full, detailed and comprehensive studies / reports to be carried out.

- ***Loss of Views for existing residents***

- Existing residents would suffer a loss of views across to the Blackdown hills – a designated area of outstanding natural beauty – this would adversely impact the residential amenity of neighbouring owners. As this is a consultation process, we feel that the loss of view is a significant point and should be taken into account by MDDC.

- **Potential density of development & impact on the character of the existing neighbourhood**
 - Our understanding is that the proposed development would have a density of 40 properties per hectare – we believe the existing neighbouring Willand Moor development is at a density of around 30 properties per hectare. The proposed development would therefore not be in keeping with adjoining areas.
 - We have objections regarding the loss of residential amenity of neighbours to the development by reason of overlooking, loss of privacy, and overshadowing.

- **Concerns around Archaeological destruction**
 - Archaeological work around 2006 has identified the presence of prehistoric deposits (early Bronze Age and Iron Age) off the Uffculme Road, near to five ways. The proposed site is close to this area and has unknown archaeological status.
 - In order not to recklessly destroy potential important archaeological remains, a full and detailed study would need to be undertaken.

- **Village Amenities and Impacts**
 - Willand school is currently very oversubscribed with no or little scope to extend without impacting on the very limited playground/field space.
 - Willand has very limited amenities including medical and shopping facilities. These are currently overwhelmed and additional population would further exceed their capacity.

- **Environmental Impact**
 - Willand is in a rural location – to access employment, amenities and facilities residents use cars. Locating additional housing in rural locations such as Willand, rather than town locations, will increase car miles spent and therefore increase emissions.
 - These points have been raised by various authorities in responses to MDDC to date and should not be overlooked – development should be focussed around key towns.

We would like to point out that there is very strong opinion against this development proposal for Quicks farm locally and we urge the MDDC planning authority to listen to residents and discount this option from the plan.

Other Development around Willand

We strongly object to any other development proposals outside of the existing settlement limit for Willand as we believe the village has now reached its maximum size. The limited amenities and environmental considerations are also a prime factor which goes against any further development.

Of most importance, which must not be ignored by MDDC are the views of the local residents to whom MDDC

serves..... The village as a whole and the Parish Council are strongly united in opposing further development in Willand. We strongly urge and appeal to MDDC to respect the views and opinions of local residents.

Other areas in the district, such as Cullompton are vocal in appealing for development to be focussed in their areas and therefore our view is that the local area plan should be adjusted to focus on these areas.

Junction 27 Commercial Development Proposals

With regard to the proposed commercial developments around J27 expanding on the existing service station and other commercial premises in the area, we comment as follows:

- ***Clarity of Proposal is Required***

Judging by the various press-releases and articles in local media, the plans proposed by the developer are frequently changing. Until plans are firmed as to the exact scale and content of the proposed development, we don't believe a proper consultation with local areas can take place. Our view is that MDDC should hold a wide and well publicised consultation once all the facts are available and a firm proposal drawn up – no planning consent should be considered until full consultation on detailed proposals has taken place.

- ***Impacts on Tiverton, Cullompton and further afield***

We have major concerns over the impact of a large scale leisure and retail development to existing town centres and facilities, impacting on existing local businesses and independent traders as well as leading to de-generation of the existing town centres and facilities.

- ***Business Viability and Future Changes of Plan***

Apart from a confused vision with lack of clarity from the developers, there has been no publicly circulated business case to support the need for the proposed commercial developments. The viability for concert halls, cinemas etc in this geographical location is highly questionable. The tourist season is only for a limited number of months per year and even then, this location is a significant distance from the main tourist areas in Devon (North coast, South coast etc). It should be noted that the North coast already has Atlantic Village – which can only support a limited number of retail outlets. Major cities such as Exeter have been unable to justify and develop some of the facilities proposed – there is a huge question mark as to whether such facilities would actually be viable here. Where is the business plan?

As a consequence, we have major concerns that any planning achieved through the current plan would subsequently change after initial consent, leading to either development of units of a type and scale at variance to the current proposal.

- ***Emissions – Environmental Impact***

Should a major retail and leisure development go ahead, who would use such facilities? The major tourist areas with large volumes of tourists will always be around the coasts - to encourage such tourists to visit would require a large number of travel miles and therefore emissions.

- ***Loss of Prime Agricultural Land & urban sprawl***

Again, a significant amount of agricultural land would be lost with this proposal, and if the proposed additional housing of 3000 homes were to go ahead a long conurbation would be formed through Willand and heading to Cullompton. This is not what local residents want.

- ***Impacts on "Welcome to Devon" and tourism***

Devon is a rural county – that's its appeal. Large amounts of industrial and Warehousing as visitors cross the Somerset border into Devon would not display a good image to attract tourists into the county. Do visitors really come to shop or use facilities that they have at home? Would tourism actually be driven away further down towards Cornwall or Dorset if Devon becomes less rural with these proposals? The recent Morrison's development off J23-24 of the M5 shows how such developments can become a major "blot on the landscape" along with the extent of additional chaos caused by large articulated lorries.

- ***Transport and Traffic Implications***

J27 is already a very busy junction during tourist season and at key times of the week. Although some enhancements are planned to relieve the current congestion, the scale of this commercial development would add huge additional strain, more than undoing the effects of the proposed improvements and would create a major bottleneck. It should also be noted that the B3181 down through Willand is an alternate traffic route should the motorway be closed and traffic chaos would ensue with this commercial development at the scale proposed.

The proposals do not consider the risk implications to Willand High Street and School.

Although some limited development around J27 may be beneficial to improve the services and provide some additional employment opportunities (perhaps including a farm shop to showcase the best Devon produce), we believe the development should be very limited and on a much smaller scale than currently proposed. The current plans are excessive, geographically in the wrong place, and would cause severe damage to the environment.

Junction 27 Proposal for 3000 Homes

We very strongly object to this proposal for the following reasons:

- Cullompton has stated a desire for the new development

Cullompton has publicly stated it would like development of this scale to be located off J28 and joining to the existing town – this would help the generation and development of the town, and this shouldn't be overlooked by MDDC. The J27 proposal would have significant adverse affects on Cullompton and Tiverton (and other towns in bordering authority areas).

- Loss of Agricultural Land and Environmental Impact

As stated in earlier sections of our response – similar objections to using prime agricultural land on this scale, and the number of car miles that would ensue could also apply to this proposed site.

- **Traffic Considerations**

There would be a horrendous impact on congestion at J27, compounded by motorway closures.

In summary for this proposal of 3000 homes between J27 and Willand, we strongly oppose this proposal on the basis that alternative sites are available (i.e. Cullompton) for which a more receptive swathe of opinion has been forthcoming. We also oppose the scale of development and lack of separation with Willand, and should any development take place for J27 (either residential or commercial) it should be on a significantly smaller scale and possibly to the north and/or east to ensure there is no large sprawling linear conurbation that would result down to Willand.

Final Thoughts

In summary we strongly object to the developments proposed for Quicks Farm and also for any other developments outside of the existing settlement limit of Willand. We also object to the huge, disproportionate proposed developments off J27 (commercial and housing). Our view is that Willand has already been the focus of multiple developments recently and has now reached its limit.

We support development to extend towns such as Cullompton, who want to embrace additional housing and facilities to support growth in the towns. This is also more environmentally sound. We also believe MDDC should be taking into account developments within neighbouring authorities such as Cranbrook, and impacts on neighbouring areas, in formulating the finalised plan.

As this is a consultation process, we trust MDDC are listening to the views of the population of mid Devon, above external parties who want to make a "fast buck", and particularly of residents who potentially may be directly affected. Consequently, we hope that the proposals will be amended to take into account these views in its next iteration.

We look forward to your response to our concerns raised in this document.

Yours Faithfully,

Jeremy and Debbie Riches.

