

# Local Plan Review Options Consultation 2014

## Executive Summary

A second stage of consultation on the new Local Plan was held between 24 January and 24 March 2014. 1201 valid representations were received from a range of respondents including individuals, organisations, groups, councillors and landowners. 97 anonymous or late comments were received and could not be registered as representations. Overall the vision, strategic and development management policies were supported. The majority of responses received focussed on Policy S3: 'Amount and Distribution of Development' and potential site allocations across the district. This document sets out the key results from this consultation.

### Vision and Sustainability (Policies S1-S2)

Overall the majority of people that responded supported the vision, spatial strategy and sustainability policies. A number of comments noted that although it was felt that this section of the Local Plan was '*admirable and desirable*' it was felt that it would be difficult to achieve.

### Amount and Distribution of Development (Policy S3)

There was some dispute over the projected housing need, although most respondents felt that this would be clarified at the next stage with the provision of the new Strategic Housing Market Assessment later this year. Most people accepted the need for new housing, especially affordable, however there were some respondents who felt there should be no further development in Mid Devon. Some concern was also raised over the level of development in and around villages whilst others supported more development in rural areas.

299 respondents commented on the two strategic policy options for how development might be distributed across the district:

- Option 1 a town centred approach, or
- Option 2 a new community later in the plan period.

Of those that responded, 30% opted for Option 1, 52% opted for Option 2 and 18% made 'other' comments. The 'other' comments received ranged from stating no preference for either option or felt that Option 1 and Option 2 should be further combined.

	Option 1	Option 2	Other
S3 Amount and Distribution of Development	30%	52%	18%

326 respondents made comments on the location for the new community option. Some people, while not being explicit about their preference for Option 1 (town focus) or Option 2 (new community) nonetheless commented on which new community location they preferred, and therefore a higher total number of representations were received for this question. Of those that responded 24% supported Option 2a 'Land at M5 Junction 27 and adjoining Willand', 59% supported Option 2b Land at Junction 28 'East Cullompton Urban Extension' and 17% made 'other' comments. The 'other' comments ranged from general recommendations for each location or no preference for either location.

	Junction 27	Junction 28	Other
Location of a new community	24%	59%	17%

### Option 1 – town focus

Various comments were received both for and against a town-centric approach. The majority of responses received for this option supported the principle of a town-centric approach, however a number of respondents that supported this option did not support the land identified at Tiverton, with particular

reference to TIV2 Hartnoll Farm. TIV2 Hartnoll Farm is the only available option identified as providing sufficient capacity for Tiverton under Option 1.

Of those that supported this option, some simply stated that they supported Option 1, whilst others went further to state that they supported Option 1 with the focus of development in existing towns including Tiverton. A few respondents specifically noted that they supported Option 1 with the expansion of Tiverton. In terms of objections, one person objected to Option 1, others objected to Option 1 as it included Hartnoll Farm and some expressed their objection only to the potential allocation of Hartnoll Farm.

As responses were highly variable in how preferences were expressed in this instance a breakdown of comments is provided rather than percentages for transparency. For example, where a respondent noted that they supported Option 1 but objected to Hartnoll Farm they would be noted in the table below as one response for the support of Option 1 and one objection to Hartnoll Farm. Percentage analysis would not be accurate as this would lead to double counting e.g. one person could count as two comments.

<b>Support</b>	<b>No.</b>	<b>Object</b>	<b>No.</b>
Option 1	59	Option 1	1
Option 1 (focus development in existing towns including Tiverton)	35	Option 1 (includes objection to Hartnoll Farm)	26
Option 1 (extend Tiverton)	8	Hartnoll Farm (reference to site only, not option 1)	41
<b>Total</b>	<b>102</b>		<b>68</b>

Main reasons for support:

- would help regenerate town centres and the local economy;
- was the most sensible option as development would be directed to locations with existing infrastructure, services and facilities;
- would be well connected to the transport network and would support sustainable travel by ensuring distances between houses, services and employment are shorter and would maximise the scope for the use of public transport, walking and cycling.

Main reasons for objection:

- the commercial element of Junction 27 would be likely to come forward even if Option 1 was chosen, which would be detrimental to town centres;
- Concerns regarding TIV2 Hartnoll Farm such as:
  - highway capacity, road safety, traffic and pollution;
  - impact on existing communities with particular reference to Halberton;
  - impact on existing services and facilities;
  - flooding, drainage and sewerage capacity issues;
  - loss of Grade 1 and 2 agricultural land;
  - impact on landscape and visual amenity;
  - impact on the Grand Western Canal County Park Conservation Area.

## **Option 2 – new community**

414 respondents made comments on the options for the location of a new community. 199 comments were received on Option 2a 'Land at M5 Junction 27 and adjoining Willand', 215 comments were received on Option 2b 'Land at Junction 28 East Cullompton Urban Extension'. The table below indicates a breakdown of those that supported and objected to each option.

Location of New Community	Support	Object
Option 2a: Junction 27	46%	54%
Option 2b: Junction 28	93%	7%

### ***Option 2a: Junction 27 'Land at M5 Junction 27 and adjoining Willand'***

This option received the largest number of objections out of the three potential options (Option 1, Option 2a or Option 2b). However, it also received substantial support.

Main reasons for support:

- sustainable location, well connected to the transport network including the Tiverton Parkway railway station and would minimise car journeys for those commuting to Exeter and Taunton;
- suitable location for a range of businesses with strong strategic connectivity and the potential to capture sub-regional investment.

Main reasons for objection:

- not a sustainable location as it would increase the reliance on the car;
- employment element of this option is not supported by the Employment Land Review as it is not a 'small' allocation and the retail element would be detrimental to surrounding villages, towns and city centres. It was also questioned whether this level of commercial and retail development was needed in the district;
- significant landscape and visual impact which would affect the 'Gateway to Devon' and there was concern over the impact this would have on tourism;
- loss of wildlife, important trees and biodiversity;
- it would lead to the loss of agricultural land;
- drainage, flooding and sewerage capacity issues;
- potential pollution impacts;
- impact on existing communities with particular reference to Willand;
- impact on existing services and facilities.

### ***Option 2b: Junction 28 'East Cullompton Urban Extension'***

This option received the greatest support out of the three potential options (Option 1, Option 2a or Option 2b); it also received the lowest number of objections.

Main reasons for support:

- supported by Cullompton Town Council;
- positive for the regeneration of Cullompton;
- good relationship to existing services and facilities in Cullompton and would help support local businesses and the town centre;
- reduce the pressure on surrounding villages;
- well connected to the transport network and there was the potential to develop a new railway station. It would also minimise car journeys for those commuting to Exeter and Taunton;
- help improve infrastructure around Cullompton with particular reference to Junction 28 of the M5;
- already near existing employment opportunities and would be an attractive location for industrial, commercial and retail development;

Main reasons for objection:

- impact on existing services and facilities;
- major improvements to Junction 28 would be needed;
- highway capacity, traffic and road safety issues. It was felt that the potential opening of a new railway should not be relied on as this would require significant funding;
- impact on local businesses and the town centre;
- impact of flooding;
- loss of agricultural land;

- loss of wildlife and habitat;
- impact on landscape and visual amenity. The site lies within the setting of the Blackdown Hills AONB.

## **Housing (Policies S4-S6)**

Several respondents noted their preference of developing underused, brownfield sites before greenfield land. A range of comments were received which discussed affordable housing. The majority of respondents supported the provision for affordable housing. Some recommended that a higher target for affordable housing should be sought; however others felt that there could be viability issues with the level of affordable housing required. It was felt that social rented housing and shared equity schemes should also be supported. A number of respondents supported the reference made to housing designed for elderly occupants or capable of adaptation. It was felt that new development should be of high quality and should complement existing housing.

Some respondents welcomed the acknowledgement of the potential under-delivery of housing targets and the mechanism put forward in policy. However others felt that this mechanism was not applicable as a five year land supply would be more relevant. For all housing policies respondents suggested greater flexibility to recognise different circumstances, for example, the provision of on-site public open space may not be appropriate in all cases.

## **Employment and Infrastructure (Policies S7-S9)**

A number of respondents noted the need for employment and infrastructure alongside the housing development. Others stated that most people will not live where they work and felt that there were many opportunities in surrounding towns and cities to absorb the employment needs from new development. Some people questioned the need for additional commercial floorspace as there were still vacant premises within the district. It was also felt that small business spaces should be promoted rather than large sites. Some concern was raised over the provision of retail and the impact on existing businesses and town centres. A number of respondents felt that most employment development should be directed to the main towns to support existing businesses and town centres. However other respondents felt that employment should be focussed around the M5 as this provided good transport links and would reduce traffic around existing settlements. The Highways Agency stated that all development likely to produce significant amounts of transport movement will need to be accompanied by a robust transport evidence base. The need for off road parking was identified by a number of respondents, both for employment and residential development.

## **Environment (Policy S10)**

Overall the majority of people supported the policy on the environment. A number of people recommended the protection of grade 1 agricultural land and greater emphasis on the protection and conservation of Mid Devon's natural landscape, cultural and historic environment, including through mitigation measures. It was also suggested that the protection of Conservation Areas and the Grand Western Canal should also be noted in policy.

## **Main Towns and Rural Areas (Policies S11-S15)**

Most people supported the policies set out for the main towns and villages. It was recognised that Tiverton was Mid Devon's largest settlement with the biggest concentration of social and commercial services and a reasonable level of transport provision which should be the main focus of new development. However, the constraints due to topography, flooding and position of the A361 were acknowledged. Respondents welcomed the reference to enhanced walking and cycling opportunities and bus services around Tiverton and Cullompton. It was felt that this reference should also be made in relation to Crediton. Only four people made a representation on the options presented for the overall amount of growth for Crediton:

- Option 1 to meet the town’s housing and commercial needs; or
- Option 2 a lesser amount of development to reflect the numerous constraints facing the town including topography.

Of those that responded it was felt that the negative impact of development on the natural environment and landscape would be significant and therefore a lesser amount of development should be sought. Others felt that topography should not be a reason to suppress the housing supply in the town.

A range of comments were received regarding which villages should be defined as settlements suitable for development. Most people agreed with limited development in villages in principle, but a number of people felt that a more precautionary approach for development should be sought, with some wanting no development at all. The following table demonstrates the support and objections to the list of villages identified in Policy S14. Often these comments were made by only one respondent and therefore a breakdown of the number of responses received has not been provided. A suggestion to include Butterleigh as a village was also made. The removal of Burlescombe and Westleigh from the list of defined settlements received both support and objection.

Support	Object
Bampton	Holcombe Rogus
Cheriton Fitzpaine	Morchard Bishop
Culmstock	
Hemyock	
Holcombe Rogus	
Sampford Peverell	
Willand	

## Site Allocations

The vast majority of responses received were based on individual site options. Excluding the three main site options for the distribution for development (TIV2 Hartnoll Farm, CU11 Junction 28 ‘East Cullompton Urban Extension’, Policy J27 ‘Land at M5 Junction 27 and adjoining Willand’) the following table sets out the number of comments received for the allocations in the main towns and rural areas. More comments have been received than the total number of respondents as one respondent may have commented on multiple potential site allocations.

Location	Number of comments
Tiverton	70
Cullompton	34
Crediton	64
Rural areas	1707

Appendix 1 provides a breakdown of the level of support and objections received for each potential allocated site. Where support was raised for some sites in rural areas, this was often presented as a preference to a site in a village over other sites in the village. Additional sites were also put forward during this consultation process and will be assessed by the Strategic Housing Land Availability Assessment panel. These sites will be consulted on at the next stage of the Local Plan process if they are proposed for allocation. Similar responses were received for various site allocations in main towns and villages during this consultation. The majority of responses expressed concerns over the impact of the new development on the surrounding area. Common themes are as follows:

**Level of development** – concern was raised over the level of development proposed for each site. Some respondents felt that the density suggested was too high. A large number of respondents in villages were concerned over the level of development proposed if all the potential sites were developed, though this is

not something the options consultation had proposed. Some respondents suggested no future development, whilst others felt there was a need for development with particular reference to affordable housing.

**Small scale development in villages** – for a number of the villages, respondents felt that any development should be small scale and where possible should be through infilling and on brownfield sites.

**Services and facilities** – a number of respondents were concerned over the impact of new development on existing services and facilities, such as schools, medical centres, bus services and shops. A number of people noted that there were limited services and facilities available in the local area to cater for new development.

**Utilities** – those that responded on the potential site allocations in villages made reference to current issues with utilities infrastructure including water, electricity, gas, broadband and mobile phone coverage. It was felt that new development would exacerbate existing issues.

**Access, parking, highway capacity, traffic and road safety** – respondents were concerned over the impact of new development on the existing road infrastructure and felt that the access or increased traffic would be dangerous to both pedestrians and those driving on the road. Various respondents were concerned over parking issues in and around the potential allocation sites. A number of people suggested that infrastructure should be provided before development.

**Pollution** – the impact of pollution was raised for a number of the potential allocated sites, particularly in Crediton with regard to increased traffic and the impact on air quality. Noise and light pollution were also raised as potential issues.

**Flooding and sewerage capacity** – a large number of respondents noted their concern over either flooding on the potential site allocation or the possibility for new development to exacerbate flooding elsewhere. Concern was also raised over sewerage capacity which could also lead to flooding.

**Landscape and visual amenity impact** – numerous respondents expressed their concerns over the impact of new development on the surrounding landscape and visual amenity. This was particularly expressed in relation to rural sites, but also sites in main towns which could be viewed from a distance due to their location. The impact on tourism and on the Grand Western Canal was raised by a number of respondents for various sites.

**Loss of agricultural land** – for a large number of sites, concern was raised over the potential loss of agricultural land and the production of food.

**Wildlife and environment** – a number of people raised their concern that the potential allocated sites were on greenfield sites where there would be an impact on wildlife and habitats. For some sites, sightings of protected species such as bats were raised.

**Employment** – the limited levels of employment were particularly noted by those responding to sites in villages. This raised issues principally around increased traffic due to people commuting to work.

**Character, conservation areas, listed buildings and heritage assets** – various sites were noted to have an impact on conservation areas, listed buildings and/or heritage assets. A number of respondents, with particular reference to villages, were concerned over the potential impact that some of these sites would have on the character of the area.

**Impact on existing residents** – various comments were received which expressed concern over the impact of new development on existing dwellings, including overlooking, overshadowing, and noise pollution.

**Settlement Limit** – a number of responses stated that did not want to see sites allocated outside of existing settlement limits.

## Development Management

32 responses were received on development management policies. The majority of responses either supported the policies or minor amendments were suggested. A number of responses noted the Department of Communities and Local Government 'Housing Standards Review' and the need to update the development management policies as appropriate.

## Appendix 1

### Tiverton

Allocation	Support	Object	Total
TIV1 Eastern Urban Extension	3	14	17
TIV2 Hartnoll Farm	85	68	153
TIV3 Farleigh Meadows	2		2
TIV4 Blundells School	2	4	6
TIV5 Howden Court	2	1	3
TIV6 Town Hall/St Andrew St	1	1	2
TIV7 Roundhill	1	2	3
TIV8 Hay Park, Canal Hill	1		1
TIV9 The Avenue	1		1
TIV10 Tidcombe Hall		8	8
TIV 11 Wynnards Mead, Bakers Hill		4	4
TIV12 Land at Moorhayes Park	2		2
TIV13 Exeter Hill	1	12	13
TIV14 Leat St	1		1
TIV15 Palmerston Park	2	1	3
TIV16 Phoenix Lane	1	1	2
TIV17 Land at Bampton St/William St car park	1	1	2

### Cullompton

Allocation	Support	Object	Total
CU1 North West Cullompton	6		6
CU2 Growen Farm	3		3
CU3 Knowle Ln	2		2
CU4 Land south of Tiverton Rd	1		1
CU5 Ware Park and Footlands	1		1
CU6 Court Farm	1		1
CU7 Land at Exeter Rd	1	1	2
CU8 Bradninch Rd	1	1	2
CU9 Land at Colebrook	2		2
CU10 Land at East Culm Farm	1		1
CU11 East Cullompton Urban Extension	201	14	215
CU12 Week Farm	2		2
CU13 Additional Cullompton Employment Sites			0
CU13 option A - Venn Farm	1		1
CU13 option B – Land adj Venndale			0
CU13 option C – NW Kingsmill Industrial Estate			0
CU13 option D – NE part of Kingsmill Estate			0



Allocation	Support	Object	Total
CU13 option E – Land South of Springbourne, East of Exeter Road			0
CU14 Eastern Relief Road	3	3	6
CU15 Cullompton Infrastructure	3	1	4

## Crediton

Allocation	Support	Object	Total
CRE1 Wellparks	4	1	5
CRE2 Red Hill Cross		2	2
CRE3 Cromwells meadow		2	2
CRE4 George Hill		2	2
CRE5 The Woods Group, Exeter Rd		2	2
CRE6 Pedlerspool	3	9	12
CRE7 Sports Field, Exhibition Rd	1	3	4
CRE8 Land at Barn Park		2	2
CRE9 Stonewall Lane Playing Field		3	3
CRE10 Land at Westwood Farm		7	7
CRE11 Land at Chapel Down Farm	1	3	4
CRE12 Barnfield		2	2
CRE13 Land at Alexandra Close		2	2
CRE14 Wellparks (employment)	1	1	2
CRE15 Additional Crediton Commercial Sites		2	2
CRE15 (a) South of Common Marsh Lane		3	3
CRE15 (b) East of Exeter Road		4	4
CRE15 (c) South fo Wellparks	1	3	4

## Rural Areas

Village	Allocation	Support	Object	Total
Bampton	Bourchier Close AL	1	9	10
Bampton	Newton Square	1	2	3
Bampton	Scotts Quarry AL PP	1	1	2
Bampton	South Molton Road	3	6	9
Bampton	Land at Ball Hill	1	1	2
Bickleigh	Land south of Glen View		7	7
Bow	West of Godfrey Gardens AL	1		1
Bow	Land adj Bow Mill Lane			0
Bow	East Langford Farm	1		1
Bow	Land adj Hollywell			0
Bow	Land adj Jackman car park			0
Bow	South West of Junction Road (Commercial)	1		1

Village	Allocation	Support	Object	Total
Bow	South fo lter Cross (Commercial)	1		1
Bradninch	Hele Road		1	1
Burlescombe	Churchyard Field		8	8
Butterleigh	Land NW of Homefield	1	1	2
Chawleigh	Barton	2		2
Chawleigh	Tower Meadow	2		2
Cheriton Bishop	Cheriton Bishop Glebe	6	5	11
Cheriton Bishop	Land near the church	1	10	11
Cheriton Bishop	Land adj Woodleigh Hall	3	5	8
Cheriton Bishop	Land east of Hill View	4	2	6
Cheriton Bishop	Land north of Brakes View	1	8	9
Cheriton Fitzpaine	Cheriton Fitzpaine Glebe	4	35	39
Cheriton Fitzpaine	Land adj primary school	26	10	36
Cheriton Fitzpaine	Land off Barnshill Close	26	4	30
Cheriton Fitzpaine	Landboat Farm	24	10	34
Colebrooke	Colebrooke Glebe	1	1	2
Copplestone	Old abbatoir site	22	18	40
Copplestone	Land adj Dulings Meadow	1	32	33
Copplestone	Bewsley Farm	2	41	43
Culmstock	Linhay Close AL	7	34	41
Culmstock	Highfields, Hunter's Hill AL	1	42	43
Culmstock	Culmstock Glebe and Rackfields	2	56	58
Halberton	Land at Blundells Road		4	4
Hemyock	Land SW of Conigar Close	5	158	163
Hemyock	Culmbridge Farm	1	164	165
Hemyock	Land north of Culmbridge Farm	1	164	165
Kentisbeare	Land by Kentisbeare Village Hall AL		11	11
Lapford	Land between primary school and church	1	3	4
Morchard Bishop	Land west of Greenaway AL	79	1	80
Morchard Bishop	Tatepath Farm		85	85
Morchard Bishop	Church Street	1	83	84
Newton St Cyres	Court Orchard	4	3	7
Newton St Cyres	Land west of Tytheing Close	2	13	15
Newton St Cyres	Land east of Tytheing Close	3	12	15
Oakford	Land at Oakford	3	13	16
Sampford Peverell	Higher Town	2	3	5
Sampford Peverell	Land off Whitnage Road		1	1
Sampford Peverell	Land at Mountain Oak Farm		1	1
Sampford Peverell	Morrells Farm	1	3	4
Sandford	Fannys Lane AL PP (part)		2	2
Shillingford	Land off Bowdens Lane		63	63

<b>Village</b>	<b>Allocation</b>	<b>Support</b>	<b>Object</b>	<b>Total</b>
Silverton	Land at Old Butterleigh Road	4	31	35
Silverton	Glebe	3	36	39
Silverton	The garage	5	11	16
Silverton	Livinghayes Road	4	9	13
Silverton	East of Hederman Close	2	82	84
Thorverton	Thorverton Glebe & paddock	1	1	1
Uffculme	Land adj Poynings		3	3
Uffculme	Land adj to Sunnydene		2	2
Uffculme	Land west of Uffculme	1	2	3
Uffculme	Land off Chapel Hill		5	5
Uffculme	Land off Ashley Road		3	3
Willand	Quicks Farm	1	37	38
Willand	Land adj B3181	3	7	10
Willand	Land east of M5	3	9	12
Willand	Dean Hill Road		16	16
Willand	Lloyd Maunder Way	1	10	11
Willand	Lloyd Maunder Way (Commercial)	2	7	9
Willand	Willand Industrial Estate (Commercial)	2	6	8
Yeoford	Land off Lower Road		12	12
Junction 27	Land east of M5	92	107	199