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Dear Sir/Madam

## **MID DEVON LOCAL PLAN REVIEW PROPOSED SUBMISSION (INCORPORATING PROPOSED MODIFICATIONS) CONSULTATION**

Highways England (HE) is responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in Mid Devon comprises the M5, namely junctions 27 and 28. Highways England has provided previous consultation responses in respect of the Local Plan Review, the last being dated 23 August 2018. At that time, we expressed concern that the transport evidence base to support the plan review had not been completed.

Since that time, discussions have continued with both Mid Devon District Council (MDDC) and Devon County Council (DCC) to complete the evidence base and to discuss necessary changes to the wording of the Local Plan to ensure that current evidence is accurately reflected. The last of these meetings took place on 29<sup>th</sup> January 2019. Following this and in view of the forthcoming Local Plan Review hearing I thought it would be pertinent to provide an update on Highways England's position.

### **J27 and associated Policies**

Highways England attended the Preliminary Hearing which sought to examine M5 J27 and associated policies J27, SP2 and TIV16 on 20<sup>th</sup> September 2018, following our submission of a signed Statement of Common Ground. At the hearing Highways England suggested a minor modification to the wording in Policy J27 section b to align with NPPF 2012 paragraph 32 and to make specific reference to a necessary mitigation scheme now identified for M5 J27 to resolve this point, from;

~~*b) Provision of transport improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway and pedestrian and cycling link across the motorway to Tiverton Parkway Railway Station;*~~

*to; b) Provision of transport improvements to ensure safe and suitable access for all modes, including necessary capacity improvements to M5 Junction 27 and pedestrian and cycling link across the motorway to Tiverton Parkway Railway Station.*

Highways England asks that the Inspector considers this modification as requested to address the points raised at the informal hearing. We are satisfied that the Plan as suggested makes appropriate provision for necessary infrastructure to be brought forward at M5 J27.

### **Wider Mid Local Plan Policies**

We recently met with MDDC and DCC to undertake a further review of some of the plan's current policy wording to ensure it accurately reflects the updated transport evidence base now available. Consequently, we (HE, DCC and MDDC) have agreed textual changes which strengthen/clarify those policies which relate to the delivery of necessary highway improvement schemes on the SRN, and where there is linked intervention, the Local Road Network (LRN). These changes are necessary to ensure that development will proceed in a way that does not result in severe transport impacts in terms of highway safety and capacity. It is understood that MDDC will present the proposed amendments as part of their hearing submission(s).

### **Transport Evidence Base**

Since our last position statement dated August 2018 we have been working closely with Devon County Council to progress the transport evidence base. This is required in order to determine the transport infrastructure necessary to facilitate the sustainability of the development set out in the plan.

In Summer 2018 DCC provided updated modelling based on the Local Plan allocations to the west of the M5 and three scenarios for the East Cullompton Garden Village, namely 1,750, 2,600 and 5,000 dwelling assumptions (the latter two scenarios make up allocation proposals outside of the existing Local Plan). This assessment demonstrated that under all three development scenarios, transport impacts on the M5 were not severe. The 2018 modelling included significant changes to the coding of the highway network including a new M5 J28a and the proposed Town Centre Relief Road (TCRR). On the basis of the evidence presented, it is agreed that this scale of transport intervention would be necessary, particularly for the higher quantum scenarios. It should be noted that HE has some concerns with the SATURN model coding, but we do not consider these sufficient to materially impact on the findings reported to support the local plan.

In December DCC undertook LinSig modelling of M5 J28, the proposed M5 J28a scheme, M5 J29 and J30. It is however recognised that this model format is not able to fully replicate the operation of the junctions and both HE and DCC note the limitations of the current model and are exploring joint working opportunities to progress further work.

Based on the technical modelling reports provided, Highways England concludes that;

- The completed signalisation scheme at J28 means 600 dwellings at North West Cullompton (NWC) can be accommodated without the requirement for any further highway mitigation.
- Both the remaining 750 dwellings at NWC and the proposed 500 at East Cullompton (EC) require the delivery of the proposed TCRR.
- More than 500 dwellings at East Cullompton will require a strategic scale intervention to facilitate the impact of the remainder of the East Cullompton allocation, which may

comprise a new Junction 28a as assumed in the transport evidence or an alternative scheme as is yet to be identified through further assessment.

- Should the proposed development come forward in an alternative order the traffic impacts will require retesting in to confirm that transport impacts on the operation of the M5 do not become severe.

In summary, it is considered that the detail of the modelling undertaken to date is appropriate for the purpose of testing the Local Plan allocations and the broad scale of necessary highway intervention. However detailed modelling to assess the most appropriate type of strategic junction intervention is still required. HE and DCC have discussed working together to complete this work.

### **Junction 28a intervention**

As detailed above the modelling undertaken to date identifies the scale of transport intervention that will be necessary, particularly to accommodate the higher quantum scenarios. Whilst Junction 28a as proposed in the plan is an option that accommodates the planned growth it should be noted that the scheme will need to be refined and other options of a similar scale may be considered more appropriate. HE have proposed to DCC and MDDC that a partnership “working group” is set up in order to test and refine options.

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It should be noted that not all of the Town Centre Relief Road options align with the current Junction 28a proposal and therefore, dependent on the preferred option, this will also require scheme refinement in order to link the necessary mitigation.

### **Other Matters**

To assist with the resolution of any outstanding matters, Highways England is currently preparing a joint Statement of Common Ground with MDDC, DCC and the Environment Agency to set out matters agreed, those not agreed (if any) and any matters which are yet to be considered. We expect to be able to provide this shortly.

In relation to HE’s current position on the Local Plan, we confirm that the transport evidence has now been completed to a suitable degree and subject to the policy wording changes recently agreed with MDDC, we are content that the development set out in the plan can proceed such that severe transport impacts will not arise on the SRN.

I trust this update is useful, and helps inform you of progress made since our last response.

Yours faithfully

*Sally Parish*

**Sally Parish**

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