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Via email: fplan@middevon.gov.uk

Dear Forward Planning Team,

Mid Devon Air Quality Supplementary Planning Document and Non Statutory Interim Planning Policy Statement: Climate Emergency Consultation

Thank you for providing National Highways with the opportunity to comment on the Mid Devon Air Quality Supplementary Planning Document and Non Statutory Interim Planning Policy Statement: Climate Emergency Consultation.

As you may be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which at Cullompton includes Junction 28 of the M5 approximately 800m north east of the town centre. It is on the basis of these responsibilities that the following comments have been made.

Air Quality Supplementary Planning Document (SPD)

We note the Air Quality SPD has been prepared to guide planning applications submitted to the Council for determination and help inform the decisions made on these.

Section 1.1. of the SPD acknowledges that the main source of air pollution in Mid Devon is road traffic emissions from major roads, including the M5 motorway. Traffic congestion has an adverse impact on both road safety and air quality and as such it is critical that growth is brought forward in tandem with the infrastructure required to support it to ensure its traffic impact will be adequately mitigated.

National Highways therefore welcomes the SPDs signposting to adopted Local Plan Policy SD01 which makes clear that development must demonstrate how it will mitigate any negative impacts associated with its traffic impact, including on air quality and highway safety.

Non Statutory Interim Planning Policy Statement: Climate Emergency

The Interim Planning Policy Statement is relevant to development and use of land and buildings in Mid Devon in relation to climate change considerations, and applicants should have regard to its principles and objectives and evidence how these have been considered and used in planning applications. The Interim Statement is supported by a Climate Emergency – Planning Applications

Checklist for all development proposals, a Net Zero Carbon Toolkit and the MDDC Net Zero Housing Assessment Tool.

Principle CP.2 'Increasing accessibility, reducing the need to travel, and efficient movement of goods' of the Planning Applications Checklist sets out measures to support the creation sustainable and connected places that reduce the need to travel and seek to change travel behaviours especially for shorter trips. National Highways strongly supports measures which aim to enhance and promote sustainable transport opportunities and ensure that places are well connected to reduce the reliance on the private car. This in turn supports the SRN in fulfilling its strategic function of enabling the long distance movement of people and goods and makes a significant contribution to enabling and sustaining economic growth, prosperity and productivity, while also contributing to wider sustainability objectives and improved accessibility to key economic and social services.

This strategic function is unlikely to change and we therefore need to ensure, and where necessary safeguard our network so that it continues to be fit for purpose now and into the future. Whilst recognising the value of sustainable transport measures, these do not negate the need for, or importance of, highways schemes that may be identified as necessary to enable planned growth to come forward or address existing safety or capacity constraints.

I hope the above comments are helpful but if anything is unclear or you wish to discuss further please do not hesitate to contact me.

Yours sincerely,



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