



## WILLAND PARISH COUNCIL

Clerk to Parish Council Ms K Taylor, 40 Townlands,  
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28 June 2019

Alison Fish  
Planning Department  
Mid Devon District Council  
Phoenix House  
Tiverton  
EX16 6PP

Your Ref: **19/00928/MFUL**

Dear Alison

**Proposal:** Erection of buildings incorporating employment (B1/B2/B8) with associated infrastructure, including estate roads, drainage, public open space and incidental landscaping

**Location:** Land at NGR 305390 112177 (Hitchcocks Business Park), Uffculme, Devon,

Following a meeting of Willand Parish Council on Thursday 27 June I am writing to inform you that

1. Willand Parish Council objects to the approval of this application.
2. The objection is based on the following factors:
  - a) It is contrary to current and emerging policies;
  - b) The scale together with potential adverse visual and environmental impact on the countryside and identity of local communities;
  - c) The adverse impact on transport infrastructure and carbon footprint;
  - d) Projected Employment and benefits to economy.
3. **Contrary to current and emerging policies;**
  - 3.1 The site is not allocated for employment or housing development in the current or emerging Local Plans. It is outside of the settlements as defined in COR13 – COR17.
  - 3.2 It will be development in the Countryside whereby COR18 applies and therefore development *will be strictly controlled, enhancing the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural community.*
  - 3.3 COR18 b allows *appropriately scaled, retail, employment, farm diversification and tourism related development.* The Council considered that what started as 'farm diversification' has now been considerably exceeded by what is currently on site and the

application should not benefit from the provisions of COR18 b. The Council was also of the view that COR18 e would not be applicable.

3.4 Emerging Policy S14 mirrors the current policy and it is noted that in paragraph 2.81 it states '*Development in the countryside will be managed to meet local need, promote vibrant rural communities and help provide appropriate forms of agricultural and rural diversification to support the rural economy and sustain environmental qualities of the countryside. Development management policies allow for small-scale employment development in suitable locations whilst retaining the intrinsic character and beauty of the countryside.'* Providing facilities for national distribution business is not considered to be meeting 'local need.'

3.5 Policy S2, as amended, of the Emerging Local Plan sets out Commercial Allocations and it will be noted that these have been reduced in scale. Rural Areas have been allocated 29,400 square metres. This application is for 34,726 square metres on one site which is some 18% over the whole rural allocation. Balanced with this is a current application being considered for Phase 2 of the Mid Devon Business Park, which is within a settlement area and the local plans, of 5,256 square metres. If this is taken from the allocation it leaves 24,144 square metres for Rural Areas. This would mean that the current application would be in excess of 44% over the proposed allocation for Rural Areas.

#### **4. Scale together with potential adverse visual and environmental impact on the countryside and identity of local communities;**

4.1 The considered excessive scale is a matter of judgement but is visually apparent from the masterplan drawings and the figures presented in paragraph 3.5 above. Add to that the number of car and lorry parking spaces to be provided together with areas of hard standing and the scale becomes apparent. A site visit will speak for itself if one observes the proposed area from the B3440, Uffculme Straight. This site, if approved, will be of a larger acreage than Uffculme itself. Not a small-scale development.

4.2 There will be a loss of environmental assets and disturbance of wildlife habitat. Although replanting and landscaping is proposed this will take a considerable time to be effective and therefore should only be given limited weight in mitigation.

4.3 Concerns are expressed with the potential to cause flooding with large areas of 'run off' and at the time of consideration the appropriate authorities' views are not available. No mitigation measures can be readily seen to protect watercourses from contamination which may occur from any spillage on site. Local residents already have issues with contamination of watercourses from the current site. The disposal of foul water/sewage seems to be 'mixed' between systems but some will be directed towards the new housing development on the opposite side of the B3440.

4.4 This is seen as another expansion of Uffculme towards Willand and there is a genuine concern in both communities of a loss of identity for the individual communities thereby adversely affecting community wellbeing and cohesion.

#### **5. Adverse impact on transport infrastructure and carbon footprint;**

5.1 The Parish Council expressed concern as to the veracity of the information contained in the Transport Assessment. It is recognised that many of the figures are speculative but some are in conflict with what is actually observed and recorded by people

living on the B3181. What is not in dispute is that there will be an increase in traffic, and in particular heavy goods vehicles. The residual cumulative impacts on the road network could be severe.

5.2 It is noted in Paragraph 3.12 of the Transport Assessment that '*These surveys were carried out in March 2014.*' The figures used would therefore appear to be five years old and since then the 2 Sisters site has virtually doubled in throughput capacity; an anaerobic digester has been commissioned in Willand with deliveries having to come via the B3181 from J 27 of the M5; South View Industrial Site has had changes of use; Phase 1 of the Mid Devon Business Park is in full use and Phase 2 is in the planning process.

5.3 Other than at the entrance to the site no improvements are to be made to the B3181 up to Waterloo Cross other than a foot/cycle way to the next junction. No account seems to be taken of the increased use of the junctions and the accident record, particularly at Leonards Moor Cross, does not appear to be mentioned. It is also known that at least one traffic count was carried out when the Uffculme School was on holiday therefore showing a falsely reduced figure for traffic flow at the junctions. The extreme estimated vehicle trips set out in paragraph 5.4 of the Assessment surely warrants major improvements to the B3181.

5.4 The detail of the Transport Plan is noted. The positives resulting from consultation of the inclusion of walking/cycle paths are noted. The emphasis on the bus service is considered to be overstated as connections between Tiverton and Willand in the evenings is very limited and many will use cars for convenience as residents do now.

5.5 The Journey to Workflow data is produced from the 2011 census and therefore is 8 years old and with the developments of housing in the area in that time these figures can only be given very minor limited weight.

5.6 Paragraph 5.14 has *assumed* various figures and there is no produced viable evidence to support the assumptions. At 5.44 certain junctions are *expected to operate well within theoretical capacity* with no evidential account of up to date or projected traffic flows in the light of current and planned developments elsewhere which will have a cumulative impact on these junctions.

5.7 Activity on this site will be increased and thereby adversely adding to the carbon footprint for the area contrary to stated aims and objectives by the council to reduce the carbon footprint by 2030. Please see 6.4 below.

## **6. Projected Employment and benefits to economy.**

6.1 The potential benefits to the economy through the generation of construction employment, business rates and subsequent onsite employment are understood and recognised. These potential economic benefits need to be balanced to the practicality of what is proposed and the potential harm to the adjoining communities. It is recognised that there is some social media support for the project in job creation.

6.2 The potential employment figures of an additional 1,000 jobs on site need to be examined. No evidence is given as to how this number is arrived at nor are there details of the types and numbers of jobs which give rise to this figure. It is noted that the unemployment figures for the whole of Mid Devon amount to about 700. It is suggested that employment on the site will come from local people no longer having to 'out journey'

for work to Exeter/Taunton etc. No evidence is seen to substantiate this change of jobs for people who travel elsewhere to work. Are their jobs compatible for change?

6.3 When one considers the availability to fill all these proposed jobs from local residents the current unemployment figures need to be considered together with the following information:

- i) The local poultry processing plant employs a high proportion of Eastern European workers as they cannot source sufficient numbers from the local population;
- ii) A very good local employer is having to leaflet households and use social media, in addition to normal channels, to try and recruit to fill vacancies;
- iii) The area regularly witnesses roadside signs from a firm seeking Heavy Goods Vehicle Drivers.

6.4 There would therefore appear to be a need to have workers travel to the site to fill vacancies thereby increasing vehicle journeys and the carbon footprint within Mid Devon contrary to its stated aims.

## 7. Conclusion

7.1 When the applicant proposal, conflict with policies, effect on the environment, wildlife and view of the countryside are taken into account, together with the potential to adversely affect the social identity and wellbeing of two separate and independent communities; it is submitted that the potential cumulative harmful effects significantly outweigh the benefits.

7.2 Refusal of the application is recommended.

Yours sincerely



Kate Taylor

Clerk to Willand Parish Council