

Our ref: East Devon LDF
Your ref:

Planning Policy
East Devon District Council
Knowle
Sidmouth EX10 8HL

Sally Parish
Asset Manager
1st floor
Ash House
Falcon Road
Sowton Industrial Estate
Exeter EX2 7LB

Direct Line: [REDACTED]

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via email: localplan@eastdevon.gov.uk

Dear Sir/Madam

East Devon Local Plan: consultation on plan changes and new evidence – April 2015

Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in East Devon comprises parts of the M5, A30, A35 and A303. It is on the basis of these responsibilities that the comments that follow in this letter have been made.

Highways England is keen to ensure that policy takes account of the need for transport and land use planning to be closely integrated. In this respect, your attention is drawn to DfT Circular 02/2013 - *The Strategic Road Network and the Delivery of Sustainable Development*, which sets out how we will engage with the planning system to deliver sustainable development. Highways England recognises that prosperity depends on our roads; so aims to support growth and facilitate development, based on an understanding of traffic conditions and behaviour, to manage the effects of development and ensure road safety. In order to constructively engage in the local plan-making process we require a robust evidence-base so that sound advice can be given to local planning authorities in relation to the appropriateness of proposed development in relation to the SRN, and the strategic highway and transport solutions that may be required to support potential site allocations.

Paragraph 12 of Circular 02/2013 states that *'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'*

Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible'*

opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the 'Highways Agency and the Local Plan Process' protocol – now applicable to Highways England.

As the Highways Agency, we have previously provided consultation responses to the Local Plan and CIL, and our comments at this point should be read in conjunction with those made earlier. Our comments on the parts of the documents which are relevant to the role and policies of Highways England are as follows, and are split into comments on the proposed changes to the Local Plan referencing the Inspector's questions as appropriate, and then on the CIL Draft charging Schedule:

EXAMINATION OF THE NEW EAST DEVON LOCAL PLAN 2006-26 HOUSING AND GYPSY AND TRAVELLERS: CONSULTATION

1. Highways England supports the change in the period that the Plan covers to 2013-2031, in order to reflect NPPF guidance and provide a 15 year time horizon. It is important that emerging policy reflects the latest guidance as far as possible.

2. We note that, contrary to National Planning Practice Guidance, the latest housing projections do not reflect the household projections published by the Department for Communities and Local Government, as these were published too late to inform the SHMA. Highways England has no comments to make on the robustness or reliability of the evidence to support the revised housing target of a minimum of 17,100 new homes between 2013 and 2031. What does concern us however, is the fact that this projection may well be a lower estimate and more housing may come forward given that the NPPF seeks to boost the supply of housing. Highways England needs to ensure that the SRN can accommodate extra development, or if not that provision is made for infrastructure investment in order to alleviate any severe impacts upon it. In order to identify this infrastructure, development levels need to be as accurate as possible and known in advance.

3. Highways England notes the proposed changes in the distribution of new homes from 50% in the West End, 40% in the seven main towns and 10% in smaller towns and villages to 64% in the West End, 29% in Area Centres and 7% to villages. We would support this in principle as there is logic in concentrating development in the West End due to its proximity to Exeter, and the overarching strategy for development to dovetail with the development strategy for Exeter with the provision of homes close to jobs and other facilities and services. It is important that planned infrastructure provision/upgrade reflects the development levels.

4. Highways England are less concerned about the location of new housing in small towns and villages as by definition they should in principle be relatively small scale and will have less of an impact on the SRN. Having said that, proposals for development will need to be supported by a robust transport evidence base, to reflect current guidance. Highways England would welcome discussions with any applicants at the earliest opportunity.

6. Given the increase in the overall housing target, Highways England would have concerns that the Plan makes adequate provision for its delivery in terms of infrastructure provision. It is not clear from the evidence base section on the Council's website what transport evidence has informed allocations and infrastructure provision, but if plans have not already been made to

review infrastructure requirements for increased development target delivery then it is important that this is done as soon as possible. This will need to inform the IDP.

14. The proposed allocation at Winslade Park is located close to M5 Junction 30 so will potentially impact the SRN. Highways England would not wish to comment on the site's suitability for housing, but would need to be content that development would not have a severe impact on the operation of the SRN. The impact of any development at the site should be included in an overall assessment of the potential impact of development in East Devon and the wider area on the SRN, so that a holistic approach can be taken to addressing any issues that may arise.

EXAMINATION OF EAST DEVON'S CIL DRAFT CHARGING SCHEDULE – CONSULTATION

Highways England notes that representations cannot be made on parts of the document that are not proposed to be changed. We are aware of the potential viability issues surrounding the Cranbrook expansion area, and would support the retention of the £68 per square metre rate proposed in the Draft Charging Schedule.

Whilst it is important that the rates are set at a level that does not put the economic viability of development or the delivery of the Local Plan at risk, funding still needs to be raised towards required infrastructure projects. The CIL rate is less at Cranbrook than at other residential developments in East Devon, and the requirements for retail development are £0 whereas in the rest of East Devon this is not the case.

Highways England welcomes the linking of CIL charges to the Building Cost Information Service (BCIS), ensuring that payments are responsive to market conditions, and in line with inflation.

Conclusion

All developments likely to have a traffic impact on the strategic road network will need to be supported by a Transport Assessment/Statement and where necessary a Travel Plan, and will be reviewed against the requirements of the policy document DfT Circ 02/2013 "The Strategic Road Network and the Delivery of Sustainable Development".

The comments in this response do not prejudice any future responses on site specific matters and Highways England would request that we are involved at an early stage in the consultation process going forward. In the meantime should you wish to discuss the above, please do not hesitate to contact me.



Sally Parish/
NDD South West Asset Development
Email: 

cc: Chris Harding, CH2M Hill

