



TIVERTON EASTERN URBAN EXTENSION (TEUE) – SECOND CONSULTATION

In submitting our response to **Mid Devon District Council's (MDDC)** draft Masterplan (**DMP**), we offer comments on both the general plan and more specifically on the impact on our immediate neighbourhood namely **West Manley Lane (WML)**.

Whilst accepting that **TEUE** is a necessary response to central government's questionable predictions for countrywide new housing targets, this far from ideal blueprint attempts to address ongoing residential and employment needs in a steady pattern of predictable expansion. Unfortunately, it seems to base itself on figures that are neither plausible for the present nor credible for the future.

DEVELOPMENT STRATEGY

*"The basis for the housing figures in **Core Strategy** is now over six years old" (LP3 p54)* and both the **LP3** and **Strategic Housing Market Assessment** are soon due for reappraisal. The question of development around **Junction 27 (J27)** has again been raised (now with **Junction 28** as a contender) the proposed need and type of housing styles is not geared to either demographic or social trends. Appropriate employment potential in the immediate area of **TEUE** does not address the current rising trend of outward commuting: house building for its own sake will simply increase Tiverton's role as a dormitory town; at least development at **J27** is more realistic and sustainable, given its present transport links.

Whilst we acknowledge **MDDC's** attempts to reduce housing figures from the original 3500 (**AIDPD**) to the present low of 1000 (**DMP, LP3**) its objective remains in excess of foreseeable needs; given the long term alteration of the area's social, agricultural and ecological environment, too much is being asked of present and future residents to accommodate unpredictable requirements. A realistic reduction in proposed dwellings would allow a more sympathetic use of valuable land.

FINANCE and ACCOUNTABILITY

DMP is far from clear on matters surrounding the cost and financing of the project. There is no mention of contingency planning should the programme falter, no confirmation of **Community Infrastructure Levy** regarding **Affordable Housing** provision, no listing of alternative sources of funding, no outline plans for implementation of ongoing monitoring, management and review. In addition, there is an entitlement to know what are the implications of "a management trust/company".

Such lack of clarity does not engender confidence in the scheme.

TIDCOMBE FEN SITE OF SPECIAL SCIENTIFIC INTEREST (TFSSSI) and ASSOCIATED HYDROLOGICAL MATTERS

MDDC makes frequent reference to the importance and protection of TFSSSI (DPM pp 33,133,135, AIDPD AL/TIV.3h, GIA 5.144, SPD p5) and goes some way to safeguarding its catchment. However, the DMP proposes the juxtaposition of further residential and road development upstream of TFSSSI, encroaching onto their own designated Green Infrastructure (GI) and on top of surrounding wetland and marsh, which it then seek to “retain and enhance” (DMP p68); in so doing it adds to the risk of surface water flooding, foul water leakage and ecological downgrading. The compaction soil during the conversion of Blundells School playing fields off WML leads to regular flooding in the lane and is a pointer to what will happen with similar further development.

There is little data on the timing, position and management of SUDS, attenuation ponds and pumping stations that would be required to protect the south and east catchment of the Ailsa Brook upstream of the TFSSSI. Again the “retained and enhanced marshland” would bear the brunt of such engineering. Enlargement of the protective zone around the TFSSSI would create a greater degree of safety.

WEST MANLEY LANE

In its DMP, MDDC frequently acknowledges the importance of WML environment with “its network of native hedgerows”, “of historic importance”, “characteristic hedge banks, sunken farm track”, and “local historic and archaeological features”. It lists WML’s Heritage Assets such as Pool Anthony, Prowses and Copplestone farms, medieval settlement, drovers track, putative site of pre-reformation chapel and significant source of Palaeolithic finds. It accepts that *the proposal will need to respect the existing dwellings* and states that “changes to WML and Manley Lane to restrict access will be needed” to reduce the impact (DMP p 65)

But in spite of all that, MDDC plans to build on its own designated GI land adding to the already increased residential development and traffic using WML, thereby condemning these same hedgerows, banks, trees and lane of which it purports to exemplify. How would a restricted access balance with an increase in residential cars?

The tranquillity of the lane and its proximity to both Railway Walk and Grand Western Canal makes it an ideal thoroughfare for increasing numbers of walkers, runners, cyclists and family groups. Restricting access to vehicular traffic would enhance that attraction, promoting a healthy exercise route for Tivertonians and visitors alike. Adding to the traffic flow will simply restrict its rural charm.

Although various ecological studies have now been conducted south of Blundells Road, the data has yet to be released. However, our own records and independently commissioned research (available on www.westmanleylanecg.org and logged with Devon Biodiversity

Records Centre) identifies a wide range of fauna and flora, some of which have significant conservation status (such as BoCC Red and Amber listed birds, UK BAP Priority Species birds and mammals) which are there because of the range of habitats, unspoilt network of green corridors and connectivity of fields waterways and hedges within **WML** and its surrounds; these may be put at risk with the inevitable changes that are envisaged. It must be noted that **GI** proposals for the area can only come into being after the development of 1000 houses (**DMP**), putting the present environment at risk.

SPORTS FIELDS WITHIN GREEN INFRASTRUCTURE ALLOCATION

The **DMP's** plan for a sports field off the Glebelands estate demands adequate parking and motor access. The suggestion is that this would be provided by constructing vehicular link along **WML** (who's "*access is to be restricted*") over wetland and marshland (which is to be "*retained and enhanced*", over an historic agricultural bridge which would need to be widened and strengthened and finally to cross the heritage asset Railway Walk!

Some years ago, the same Glebelands estate was earmarked for enlargement into the space now scheduled for the sports field: exchanging this with a similar designated housing plot at the junction of **WML** and Blundells Road would allow easier traffic and minimise the threat to the marshland draining into the **TFSSSI**.

The *theoretical* concept of **TEUE** is understood and accepted; the practical application as contained within the **DPM** is overambitious, wasteful and disjointed. The initial **TEUE Options Report** showed the beginnings of a workable development; much has been lost in the intervening period.

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