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Ask 21.1.14

From: Mr DJA Stone FCMI MIO D MSoA

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Master Planning Consultation (Tiverton EUE)
Forward Planning
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16 January 2014

Dear Sir,

TIVERTON EASTERN URBAN EXTENSION (TEUE) – SECOND CONSULTATION:
OBJECTIONS AND CONCERNS REGARDING THE LARGE-SCALE URBANIZATION
OF THE RURAL AREA TO THE EAST OF TIVERTON

GENERAL

1. During December 2013 and January 2014 I attended the various TEUE second public consultations and display activities in Tiverton and Halberton, and now wish to raise my concerns and register my strong objections to aspects of the TEUE development plan. I accept that some level of development is necessary in order to meet government mandated policy objectives, but that the overall scale of that proposed for the TEUE is both excessive and on a scale that cannot be justified as a response to any sort of local house building requirement.
2. My broader objections are dealt with later, at paragraphs 14-22. However, I wish first of all to highlight at paragraphs 4-13 below a particular aspect of the plan that falls outside the actual physical area of the TEUE, but which nevertheless bears very directly upon the overall TEUE plan as currently conceived. This is the critical problem of traffic flow to and from the TEUE via Halberton. I raised this issue with several of your officials and the developer's representatives face-to-face during the initial consultation period, when all of them agreed that this was a most significant obstacle for which no solution then existed but for which one would have to be found before the next public consultation phase if the TEUE was to be viable. I have now viewed the second public consultation proposals and had the same discussion with the officials manning the updated displays, who again indicated that they were very well aware of the traffic problem to the east of the TEUE beyond the Grand Western Canal road bridge. However, they again confirmed that there was no obvious solution to this problem apart from the hope and arguably questionable expectation that drivers would in due course use the new A361 access to avoid

Halberton, with the continuing difficult traffic conditions at Halberton serving to discourage future TEUE residents and service vehicles from choosing to use the route through that village.

3. Irrespective of the many wider concerns and objections already expressed by those individuals and communities who would be directly affected by the imposition of such a large-scale urban development and population increase upon this rural area, I firmly believe that the Halberton traffic issue now has now become an 'elephant in the room' bearing significantly upon this planned development. This issue represents a practical obstacle of such importance that a failure to resolve it now will surely balk further progress of the wider TEUE concept and development plan.

DIRECT IMPACT OF TEUE UPON HALBERTON

Introduction

4. As no action has apparently been taken by either the MDDC or the developers to deal with this particular matter either since the TEUE was first mooted, or as a consequence of the first public consultation, I now raise once again my concerns relating directly to the anticipated additional volume of traffic through Halberton. I have updated several of these points in light of the changing traffic situation and deteriorating physical state of the local highway during the last twelve months, both within Halberton village and to the east of the Grand Western Canal road bridge.

Perceived Status of Halberton High Street and Connected Roads

5. The second public consultation identifies Blundell's Road as the main through route of the TEUE. However, to the east of the TEUE, Blundell's Road becomes Halberton Road, which in turn becomes Halberton High Street before branching off on to the Willand Road and eastwards to Sampford Peverell as The Turnpike. The changing character and progressive degrading of the capacity and inherent level of safety of these roads, as well as the physical deterioration of various stretches of road surface, is important; any notional categorization of these roads as equivalent to the TEUE main through route is currently unsupportable.

The Highway from the Canal Road Bridge to Halberton Cemetery

6. The road from the Grand Western Canal road bridge running eastwards to the sharp left-hand bend by Halberton Cemetery is bordered by raised farmland land, with high Devon banks demarcating both sides of the road, and with no cycle lane, pavement or verges. The width of this road varies, but it is generally just wide enough to accept two ordinary cars or transit vans passing. However, buses, many commercial vehicles, HGV cargo trucks, articulated lorries, towed caravans, motor homes etc. and most agricultural vehicles unavoidably overlap the road's centre line, so that ordinary vehicles regularly have to pull in to allow these large vehicles to pass by safely.

Halberton High Street

7. The TEUE is a major urban development which would inevitably become a dormitory estate for Cullompton, Taunton and Exeter, as well as for some locations in North Devon. Consequently, even with the new A361 direct

access junction in place, a significant increase in the inflow and outflow of vehicles from this development through Halberton, Tiverton and Sampford Peverell would be virtually inevitable. Along the High Street the village houses generally abut the street directly; most have no front garden and these houses are therefore in very close proximity to the passing traffic. Accordingly, every day they are directly affected by the noise, particulate pollution, carbon monoxide fumes, light pollution, road dirt, any oil spillages, consequential road repair work and potential subsidence due to the vibration caused by HGVs and other traffic.

8. Any future increase in the overall traffic flow along what is an already dangerous, over-used and (in practice if not by definition) secondary road along Halberton High Street would be to the further detriment of the quality of life, health and lifestyle of Halberton residents, while at the same time inviting road traffic collisions, an increased threat to pedestrians and cyclists. It would also result in the further deterioration of road surfaces that are already peppered with deep pot-holes, worn-out road markings, and sections of road that have been patched superficially with tarmac and now require proper resurfacing.

The Existing Traffic Calming Scheme in Halberton

9. The existing traffic calming arrangements – chicanes at each end of the High Street, together with the creation of a part-pavement and a virtual pavement on one side of the road – have served the village well for several years. However, the much-increased volume of traffic using the High Street in recent years frequently exceeds the ability of the scheme to control and moderate vehicle movement as effectively as it has in the past. Today, many drivers of all types of vehicle disregard the 20 mph speed limit, while others misunderstand or ignore the chicane system and the 'Give Way' signs along the High Street. At the same time, the sometimes ill-judged (and in some cases illegal) parking on the High Street and by the adjacent road junctions within Halberton further compound the village's current traffic problems, especially in the area of the chicanes and by The Barge public house. Together, these factors increase the likelihood of death or injury to drivers, cyclists and pedestrians alike in the future, as well as triggering what have thus far been minor but not infrequent incidents of 'road rage' at the chicanes.

Impact Upon Cyclists

10. There has been a steady increase in the number of cyclists (individuals and groups) using the through road via Halberton since about early 2011. When travelling along the High Street, within the 20 mph zone, cyclists necessarily oblige following motorists to adopt their speed, as the street is too narrow to allow safe overtaking or the unconstrained passage of two-way traffic along much of its length. To do so would usually involve vehicles having to mount the pavement or drive on the virtual pavement, as well as exceeding the 20 mph speed limit. To the west of the village, where cyclists are travelling westwards (i.e. uphill) from Halberton cemetery in the 40 mph zone, they again oblige vehicular traffic to slow down to cyclist speed. Most motorists simply accept this situation, although frustration with such delays prompts some drivers to attempt to overtake the cyclist(s). While overtaking, these motorists risk being confronted by a previously unseen vehicle suddenly appearing over the canal road bridge, approaching them downhill at up to 40 mph, which has the potential to precipitate either a head-on collision or (more likely) the overtaking motorist instinctively swerving left and clipping or crushing the cyclist(s) against the Devon bank. Where commercial or agricultural vehicles moving in either direction encounter oncoming traffic, the general risk to cyclist(s) on this particular stretch of road increases dramatically, irrespective

of whether or not any overtaking is in progress.

Options to Mitigate the Halberton Traffic Problem

11. Road widening is an obvious solution, with the upgrading of all of these roads in and about Halberton; alternatively, a new by-pass road well to the south of Halberton, running between the TEUE and Willand could solve the problem, while enabling the virtual pedestrianization of Halberton village other than for residents, direct access and agricultural vehicle movement. However, in both of these cases, it is hardly likely that the requisite major road works would be either practicable, financially sustainable or physically achievable – certainly not in time for their completion before any construction work on the TEUE takes place. Also, there is almost certainly no scope for widening Halberton High Street within the village.

12. Nevertheless, various positive traffic control measures and well-publicized disincentives to all non-residential traffic into and through Halberton and Sampford Peverell could contribute significantly to easing this problem. These measures could include speed enforcement cameras, a statutory ban on any HGV through-movement (including TEUE construction vehicles) except for access or by agricultural vehicles, robust enforcement of the 20 mph speed limit in Halberton and its extension throughout Halberton Lower Town and as far west as the Grand Western Canal road bridge. There should also be robust enforcement of the existing on-road no-parking areas throughout Halberton in accordance with current traffic laws, regulations and by-laws. SATNAV software for commercial vehicles should show the road through Halberton as unsuitable for HGV movement.

13. Irrespective of the eventual nature, scale and scope of any final TEUE plan, it is in any case now time to update and upgrade the control of traffic in and transiting Halberton. The TEUE should be a catalyst for such action, which could also alleviate this aspect of the detrimental impact of the TEUE upon Halberton. At the very least this should involve the straightforward measures set out at paragraph 12 above. However, a more comprehensive and effective solution might also include a system of traffic lights to replace the existing chicanes at the east and west ends of the village. Arguably, such measures are already overdue; however, the intended TEUE development reinforces the need for their implementation before any significant TEUE construction takes place. This would deter any increase in the volume and HGV content of through traffic during and after TEUE construction as well as implementing the safer and more effective control of traffic through the Halberton vehicle bottle-neck during the decades thereafter.

GENERAL OBJECTIONS TO THE TEUE

MDDC Justification for the Construction of About 1,500 New Houses

14. I remain unconvinced that there is any need for an urban development on this scale between Tiverton and Halberton. The projected housing requirement portrayed by MDDC in its forward plan when it was mooted some five years ago was flawed in several key areas, as well as reflecting what was the then central government's ideological and perverse 'one size fits all' political agenda and centralized policy for its planning strategy. That

today's central government has allowed much of its predecessor's housing development planning strategy to continue beyond 2010, with only relatively minor modifications, is less an endorsement of its predecessor's policy and more an indication of apathy, misjudgement or weakness on its part. Accordingly, having now followed the subsequent proposals, publications and consultations relating to the TEUE over the past eighteen months, I remain unconvinced that this situation has changed in any way. Despite a reduction in the total number of houses shown in the TEUE second public consultation plan to about 1,500, any proposed requirement for more than a maximum of a few hundred new houses is unsustainable.

Adverse Impact Upon Local Community Facilities

15. The second public consultation shows a slight reduction in the total number of houses from that originally proposed. Nevertheless (and notwithstanding the intention to provide a brand-new primary school), the ability of Tiverton's existing police, fire, secondary education, NHS hospital and social services, GP practices, dental practices, foreign-language translators, waste collection and disposal facilities, transport, and utilities would be inadequate to support such a large-scale influx of (say) a minimum 4,000 to 5,000 people. It would be disingenuous to suggest that these already over-stretched services and facilities will automatically expand to accommodate such a large influx of people of all ages, origins and socio-economic circumstances, while at the same time the services currently provided to the existing residential community would inevitably be degraded to varying degrees.

16. Any counter argument that this development would produce significant new employment opportunities (and the current intention to include some employment sites within the TEUE is noted) is equally disingenuous. While the necessary increases in funding to expand what are primarily tax-payer funded public services would presumably result in increases in Council Tax for all residents, at the same time many of these public service and new on-site jobs would almost certainly be filled by people not resident in the TEUE or elsewhere in Tiverton.

Adverse Impact Upon Tiverton's Tourist Industry, Local Environment and Wildlife

17. Tiverton, as does much of Devon, depends directly or indirectly upon tourism as a primary source of revenue and employment. The physical impact of a development of this scale, and all that would be associated with it, upon the presentation and aesthetic appearance of the town's surrounding area and the important rural aspect of the eastern gateway to Tiverton would be potentially catastrophic and certainly irreversible.

18. The future disinclination of potential tourists to visit a town dominated by its surrounding housing-estate urban conurbations – rather than the historic and traditional Devonshire market town that Tiverton can still claim to be – would impact adversely upon a wide range of tourist accommodation, coffee shops and restaurants, historical and leisure attractions and hospitality services within Tiverton. Far from the TEUE generating new employment opportunities, the existing jobs of people employed locally in the town's tourist and hospitality industry could be placed at risk.

19. Particularly affected would be Tiverton's single most important tourist asset: the Grand Western Canal. Wildlife (especially bird life), leisure activities, individual and community health and fitness, the Minnows Caravan Park (at Sampford Peverell) and the Tiverton Canal Company could all suffer varying degrees and types

of consequential damage or financial loss. Meanwhile, assuming that pet ownership by prospective TEUE residents would over time number (say) several hundred cats and dogs, this would inevitably – in the case of dogs – adversely affect the day-to-day cleanliness of the canal tow-path between the canal road bridge and the canal basin, while cats would pose a significant threat to all bird life by the canal and across the wider rural area adjacent to the intended development.

Adverse Impact of the Permanent Loss of Agricultural Land

20. The TEUE would involve the permanent loss of a large tract of prime agricultural land to housing and associated development. However, this is land that could still be required for food production and other agricultural purposes in the years ahead (or even for a major green energy project such as solar panels, which – unlike housing – could be temporary and would be infinitely preferable to further urbanization and local population growth).

Impact Upon Existing Infrastructure

21. The TEUE would inevitably place a potentially unsustainable additional load upon existing local utilities, drainage, sewerage etc. beyond the immediate area of the TEUE. In addition to those facilities laid within the TEUE site, large numbers of existing pipes, cables, electricity substations, telephone facilities and other associated infrastructure well beyond the TEUE would need upgrading to support the development, which would in turn impose massive disruption upon an area east of Tiverton for many years, including Halberton and stretching as far as Sampford Peverell.

Impact Upon Future Flood Prevention

22. Despite the assessment statements included with the original forward plan, and those included in subsequent publications, the threat of flooding in the TEUE area remains largely unquantifiable. Nevertheless, the recent flooding across much of the south and south-west of England serves to underline the potential recklessness and perils of concreting over large tracts of greenfield land which has a key role in absorbing rainfall and surface run-off from buildings, hills and overflowing waterways. While a number of landscaped green areas are shown on the second public consultation maps and plans, these still appear to fall far short of the sort of legally-required run-off arrangements identified by the government in the sustainable flood relief development legislation introduced four years ago and which is now apparently moving towards its general adoption at a practical level.

Yours sincerely,

A handwritten signature consisting of several strokes, including a long horizontal line that curves upwards at the end.