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Copplestone Flat
West Manley Lane
Tiverton EX16 4NH

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Forward Planning – Masterplanning Consultation
Phoenix House
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Dear Sirs

The evidence presented at the various exhibitions and published in the DMP remains weak. The plans lack clarity and timing, contain errors and omissions and are deficient in data.

It would have been helpful if the following points had been addressed;

1. What are the differences between the Masterplan rejected in September 2013 and this one? There appears to be very little that has changed and it would have been helpful if any changes/additions had been clearly annotated to the SPD. If the first plan was rejected through lack of detail then this second plan can go only have the same result.
2. Housing Numbers. There remains much debate over the housing numbers required for Tiverton and the EUE in particular. The LP3 refers to 1000 to 1500 dwellings in the EUE in Policy TIV1. The LP3 also refers to 1250 dwellings in Table 9. The Masterplan refers to 'around 1500 dwellings'. Which is correct and when will the new SHMA be available for the public to review?
3. The Masterplan is very quiet in relation to the funding of the EUE. There is no cost benefit analysis and no breakdown of any of the costs associated with the infrastructure required. Simply to say that a bid has been made by DCC of £5.1m towards the cost of the junction to the A361 and works to Junction 27 of the M5 is not good enough. The public needs to know how much the EUE project will cost and how much is to be publically funded.

What other sources of external funding have been identified and what is the timetable to know if these applications have been successful? What contingency plans are in place should

there be a shortfall. What happens if the funding is cut during the lifetime of the project? When will the CIL funding of the infrastructure be reviewed as documented on in 6.1?

4. **Accountability** – there is very little mention of reviewing the Masterplan as it progresses. A project of this scale needs accountability and continuous reference to both the Masterplan and guiding principles. Who will manage this process? Will it be independent? How will MDDC ensure that we are not left with another eyesore like Moorhayes? Please provide evidence of the viability testing of the current plans as described in 6.6 and the frequency of retesting the plans & viability. What process has the council instigated to monitor implementation of the plan?
5. **Policy AL/Tiv/6** states a maximum of 400 dwellings will be built before the Green Infrastructure between Pool Anthony Bridge and Manley Railway Bridge. Yet the trigger point for this is now given as 1000 dwellings Phase 2a. Please explain?
6. **Local residents** within the EUE and the West Manley Lane Conservation Group have consistently canvassed for a Green Corridor and protection of Tidcombe Fen SSSI which has been reinforced by the Green Infrastructure Assessment published by MDDC in December 2013. With the proposed reallocation of housing south of West Manley Lane, and a 'possible vehicle link' to Glebelands sports field the GI corridor is rapidly disappearing.

Building south of WML and eating into the Green Infrastructure/Corridor impacts significantly on the SSSI, WML vehicular movements & access (witness 22nd January when Blundell's Road was closed and WML became a rat run with cars unable to pass). How is the plan to protect the ancient hedgerows of WML reconciled with building south of WML and the additional vehicle movements expected as a result?

7. **MDDC** are aware of their responsibility to protect the Tidcombe Fen SSSI from any further adverse hydrological changes and provide a protection zone to its north and east; to extend that zone further south and west, upstream, would be of greater value. Recent hydrological mapping has outlined the catchment for the Ailsa Brook and its previously unmapped flood plan.

Further housing development south of WML will add to the risk of both surface water flooding (note the effect of soil elevation and compaction in Blundell's playing fields on flooding) and drainage of foul water into the Ailsa Brook/SSSI, there being little suitable land available for the construction of SUDS and attenuation ponds below the proposed building site in Orchard Close and Underway fields

Confirmation that the construction of any necessary SUDS/Attenuation ponds and associated pumping stations and sewage pipes must be underway before the commencement of development higher up the site, to guard against infiltration into the catchment area draining south.

8. The SPD refers to restricted access for West Manley Lane and Manley lane. What is the trigger for these restrictions? It is recommended that restrictions should be in place before development begins.
9. Mention is made of a Neighbourhood Management Plan. When will this take place and when will the governance structure be discussed? When will the annual service charge to residents and business occupiers be introduced and at what level. Will existing EUE residents be expected to pay the annual service charge?

Conclusion

It is clear that Mid Devon Forward Planning now accept what many have been saying for the last 5 years, namely that large numbers of residents in Tiverton commute to Exeter or Taunton and that no amount of land allocated for employment will be taken up in Tiverton to justify the building of 1500 dwellings in the EUE.

The recently published LP3 is now proposing the option a new town at Junction27 of the M5. This is not new and was presented 5 years ago as an option when the EUE was first suggested.

Already 60% of Tivertonians commute elsewhere to work particularly to Exeter, where the city provides employment opportunities of a higher technical ability (IT, University teaching, communications). This percentage will only increase as Exeter develops further its high quality employment opportunities. Rather than burden Tiverton with a dormitory town offering cheaper housing than that available in Exeter or Taunton now is the time to recognize the mass daily exodus and provide a sustainable solution at Junction 27. Rail, bus and vehicle options already exist at Junction 27. It would make so much more sense to have commuters walking or cycling to Tiverton Parkway and catching trains to Exeter or Taunton.

MDDC should be bold and put a halt to the EUE and fast track the much more sustainable option of a new town at Junction 27 that would become the gateway to Devon. As a result MDDC would save the public purse the unnecessary expense of new junction on the A361 and all the infrastructure of the EUE and be seen as visionary and strategic.

Yours faithfully



Graham Keene

