

Masterplanning consultation  
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31 January 2014

Dear Mr Guscott

**RE – Tiverton Eastern Urban Extension Masterplan Consultation**

Thank you for the opportunity to comment on the consultation draft Tiverton Eastern Urban Extension Masterplan Supplementary Planning Document (SPD). The county council considers that the collaborative work between the two authorities in the preparation of the masterplan has been effective and would like to thank Mid Devon District Council for this opportunity. We hope that similar collaborative working will occur in phase two of the masterplanning process (for 'Area B', to the south east).

Our comments on the draft Masterplan SPD are given under specific topic headings, as follows.

**Education Provision**

The Education Authority welcomes the principles as set out in the masterplan, in particular the provision of a new primary school and recognition that additional secondary provision will be required over the period of the development. The size and location of the primary school is considered appropriate as has the potential to be serviced early in the development and is well positioned to form a key part of the community hub.

The proposal is consistent with Devon's Education Infrastructure Plan 2013 – 2031 which provides an estimate of future pupil numbers on a district planning authority basis and proposed new infrastructure required to support growth plans.

<http://www.devon.gov.uk/education-infrastructure-plan-v1.pdf>

Specific comments on primary and secondary education facilities follow.

## Primary schools

Consistent with the national position, there has been an increase in births and young children in the Tiverton area which will reduce the number of pupil places available to support the Eastern Urban Extension. Births in the town have increased since 2004-05 by some 18% and it is anticipated that the impact of unimplemented consents and demographic change will see the majority of local schools reaching capacity later in the decade.

There are five schools within 2 miles of the proposed development, only three primary schools are projected to have any surplus capacity to support the early phases of development, the level will be dependent on future births and migration into the town.

Whilst the provision of the completed primary school by the occupation of 1,000 dwellings is considered appropriate, it is likely the school will need to be developed incrementally as housing is occupied. Evidence from other major developments in Devon demonstrates schools will tend to grow from early years and Key Stage 1 and therefore the first phase of build of the school is likely to be required some time before the 1,000<sup>th</sup> dwelling, it is suggested that a trigger of no later than 400 dwellings across the masterplan site would be appropriate for the construction of the first phase of school facilities. In addition, experience from Cranbrook, where the primary school was established very early in the development, has shown that early provision will support the development and ensure the school is financially sustainable as soon as practically possible.

The masterplan (page 97) currently sets out that the primary school site should be delivered prior to commencement of development south of Blundell's Road. Whilst this seems sensible because this is where the school is likely to be located, there are potential issues that may arise if the development phasing within the masterplan is not followed. Indeed, an application for 330 dwellings on part of the area north of Blundell's Road has already been submitted, and further applications for this side of the road could be forthcoming prior to any development to the south. This would potentially cause significant problems in terms of education provision, unless the primary school site to the south of Blundell's Road can be secured in phase with the new pupil generation from the housing to the north. As such, the county council will require land contributions (to secure the site) from all new development and it may therefore be the case that the school site (and potentially facilities) is secured prior to any development to the south of the Blundell's Road. The Masterplan should be updated to reflect this possibility, although it is accepted that this should not be necessary if the phasing in the masterplan is followed.

It may be the case, if too much development comes forward before it is likely that the county council can secure the site and deliver facilities, that the county council will object to planning applications based on unacceptable impact on education facilities. The county council will therefore keep under review the development applications coming forward and their likely impact on primary education facilities. For clarity, all developments will need to contribute towards providing the new school facilities as well as the land / serviced site.

## Secondary schools

As in most areas, Tiverton High School is projecting to see a fall or levelling off in numbers over the short to medium term. However based on known pupils living in the catchment area and demographic issues highlighted above, the school is projected to be

admitting over their planned admission number from September 2016 with a shortfall of places projected later in the decade.

The scale of proposed development and the associated costs and land requirements means that a new secondary school is not required/justified and therefore additional accommodation will need to be secured at the existing school. Whilst there are significant challenges with the existing site, initial feasibility work suggests the school can be expanded. The school is working closely with PETROC and local community groups including Tiverton Community Arts Theatre to consider ways to maximise their campus including the potential to secure/utilise additional land.

The county council intends to secure appropriate contributions from new developments towards secondary education facilities.

### **Historic Environment**

The Historic Environment Team has been liaising closely with both Mid Devon District Council and the archaeological consultants who have contributed to the preparation of the Consultation Draft Masterplan Supplementary Planning Document.

The scope of the archaeological work that has (i) been undertaken and (ii) will be required either in support of any future planning applications or through appropriately worded conditions on any consents granted is set out in the adopted policy (AL/TIV/3) and the draft masterplan. It is considered that these will satisfactorily provide for suitable archaeological investigation and recording as planning applications are submitted.

### **Waste Planning and Carbon Reduction**

The reference to the potential energy from waste facility to contribute to energy and resource efficiency (page 55) is welcomed and is consistent with the proposal for the urban extension in the emerging Devon Waste Plan. However there is no mention of the construction of a district heating network to serve the development, using the heat from the energy from waste facility. The potential to use the heat from this facility is a key reason for its placement within the eastern urban extension. The masterplan should state more clearly that a district heating network should be provided by the developers throughout the masterplan area (areas A and B).

It is considered that it may be the case that there is a phasing issue between the delivery of the energy from waste facility and the other development in the masterplan. If a scenario arose where the residential / employment / mixed use development was constructed before the energy from waste facility, it would be pragmatic to provide a district heating network powered by gas or biomass until the energy from waste facility was provided. This would still provide carbon savings over and above current carbon saving requirements.

The Pre-submission Consultation Devon Waste Plan identifies an area of land for the location of an energy recovery facility that includes the proposed employment land within the Urban Extension. The masterplan actually identifies a more specific location for such a facility. However this is not felt to be an issue as there is scope for this to be reflected in the Waste Plan through a modification at its Examination stage.

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Strategic Director Place Heather Barnes

With regard to recycling facilities, Devon County Council are considering options for upgrading or replacing the recycling centre at Ashley. One of these options may involve the construction of a recycling centre within the eastern urban extension (EUE), most likely within the identified employment area. The masterplan should be updated to reflect this possibility.

Further to the above comments, the guiding principle on page 43 to ensure that the sufficient space is provided for the storage of refuse containers is welcomed, however this would benefit from being more specific, stating that space for recycling and refuse containers, both inside and outside should be provided.

## **Transportation**

### Internal Highway Links

The proposed link through the old hospital site shown on page 64 (item 10) should be shown as a primary highway access to the development in the north-west section of the site. The primary access currently shown on the golf course road should be shown as a secondary access. This is in the interests of mitigating the impact of development on the surrounding highway network, specifically with regard to providing a safer and more sufficient access. If for whatever reason it is not possible to secure this as the primary access route, then a sustainable access route should be provided to ensure permeability and to ensure attractiveness of the more sustainable modes of travel.

The possible link through Fairway shown as item 11 on page 64 is not considered acceptable as a main highway access to the north-eastern parcel of the masterplan area. However, it could be used as a green link if the land were to become available. Clearly, this would not be needed however if the highway and / or sustainable link through the former hospital site is provided.

If, for whatever reason, the highway / sustainable travel link through the former hospital site cannot be achieved, then the preferred access route to the north-eastern area of land proposed in the masterplan area is by using the golf course road. This is because Uplowman Road is not able to accommodate a large increase in traffic. The plan on page 64 shows Uplowman Road as a primary access, and this will need to change to secondary / tertiary. Indeed, it is considered that in phase with the development to the north of Blundell's road, Uplowman Road should be made a no through road with the provision of emergency access, footway cycleway provision into the new site to reduce rat-running and an unacceptable increase in traffic along this route. This proposal still requires further consultation to assess desirability and design but should be included in the phasing table on page 96 - it is anticipated that this would be delivered in phase 1B.

Changes to the Fairway / golf course road junction are also being considered to prevent Fairway from becoming a rat-running route to the development. Whilst this junction proposal will be subject to further public consultation to assess its desirability and design, it should be added to the phasing table on page 96 where it would be delivered in phase 1B.

### Blundell's Road Traffic Calming

The traffic calming plans detailed on page 86 are only one of a number of possible schemes that could be introduced at this location. Devon County Council will be working on a design for this with input from Blundell's School to achieve the best scheme for everyone involved. It would be beneficial if the masterplan could make this clear.

### Transport Infrastructure Phasing

Highway triggers on page 96 agree with DCCs recommendations but the construction access off the A361 is subject to highway safety assessments as mentioned on page 65. Depending on when development of the EUE begins and when the money is secured for the second phase of the junction, it may be possible to build the full junction in one stage. This would improve accessibility of the site earlier in construction as well as reduce construction time which would have less impact on the current highway network. The phasing table could be amended to show the construction of the full junction as a possibility. This said, the inclusion that the westbound lane left-in left-out element of the junction should be completed prior to any development commencing is supported.

### New link to Heathcoat Way

The county council confirms that traffic modelling identifies that the equivalent traffic generated from up to 2000 dwellings can be constructed in the EUE before a new link to Heathcoat Way will be required, so long as the new junction onto the A361 is provided and traffic calming is provided on Blundell's Road.

### Traffic and Transport Requirements for Planning Application

Each application will need to include a transport assessment for the whole site as stated on page 107 but the assumptions for each of these will vary depending on the applicant.

The masterplan should also ensure that transport assessments for the individual applications assess and propose mitigation for the potential impacts on Halberton and Sampford Peverell from development traffic.

The requirement for a travel plan with each individual application should also be included within this section. Whilst a whole-site framework travel plan would be ideal, it is recognised that this may be hard to achieve with all the planning applications coming forward at different times. Therefore, it is recommended that the travel plans (and transport assessments) should all be prepared in a co-ordinated manner that takes account of the other proposed developments within the masterplan area. It would be appropriate to amend the masterplan to reflect this more pragmatic approach.

### Infrastructure funding - latest position

Funding for improvements to J27 have been secured through a joint bid from Devon County Council and the Highways Agency (HA) through the HA Pinch Point Programme. This will see the southbound off-slip widened to three lanes and part-time signalisation of both the M5 off-slips. These will be in operation during the morning and evening peaks as well as the busy periods during the school holidays and over bank holiday weekends. These works will be completed by March 2015.

The securing of this funding led to improvements to this junction being taken out of the LEP funding bid. Investigation of the requirement of further improvements at this junction need to be undertaken but funding from additional sources will be required if other improvements are necessary. This is not what is stated in the table on page 152 of the SPD, and as such it should be updated accordingly.

Further work - sustainable travel connectivity to Lowman Way Business Park

In the interests of creating a development that has sufficient and suitable access to the surrounding urban form, particularly travel destinations such as employment areas, it is advised that opportunities for creating a pedestrian / cycle link between the masterplan area and the Lowman Way Business Park should be further investigated. If found to be deliverable, it is anticipated that such a link would be funded by the developers of the masterplan area.

**General points**

Paragraph seven on page eleven states that further design guides will be prepared. It could be clarified whether this is a commitment of Mid Devon district and if so what is the prospect of these coming forward.

The plan on page 45 indicates that the new junction linking from the masterplan area onto the A361 will be a roundabout. However, a roundabout on the A361 at this location is not acceptable to the county council as this will impact the strategic operation of this road. It is recommended that this plan is altered accordingly.

It is considered that references to the introduction phasing of the community infrastructure levy in Mid Devon on page 92 will need to be updated.

The phasing strategy on page 154 should read "left-in, left-out" not "left-in, left-out"

If you have any questions please do not hesitate in contacting me.

Yours sincerely,

**Stuart Langer**  
**Senior Planning Officer - Devon County Council**