

## **Response to the revised Masterplan for the Tiverton Eastern Urban Extension** For Forward Planning team from L Clunies-Ross January 2014

### **Tiverton's setting**

The topography of Tiverton constrains its growth. The ambitious Eastern Urban Extension Masterplan illustrates this perfectly; struggling to plan extra housing and industry on the only reasonably flat area of land that is not on a floodplain. The designated area is presently productive farmland, draining south to the Alsa Brook and Tidcombe Fen and to the River Lowman to the north. The Grand Western Canal passes along part of the southern boundary of the EUE. Given the location its main problem is access – access from the existing town centre lies through a school campus, country lanes feed in from the north and east and there is no direct access to or from the A361. A second challenge is presented by the infrastructure that is required to make this development possible: this needs a Masterplan of its own, to ensure that infrastructure matches requirements at every stage of the development. Costs for this infrastructure need to be established and sources of finance identified.

### **Issues**

My response refers mainly to those issues I regard as of major importance before any development begins. To date, this whole plan appears to have nicely presented ideas but it still lacks a robust evidence base for all aspects. The supporting documents and appendices are lightweight and some are incomplete. (see below)

### **Access**

A361 Access to the Tiverton Eastern Urban Extension (EUE) is problematic and present proposals are worrying. The vast grade-separated cloverleaf-style junction planned to link the new development to the A361 appears to have little regard for local landforms or local residents. Placed awkwardly to one side of the industrial area it is far too close to existing housing at Post Hill, acknowledged as one of the most desirable residential areas in Tiverton. This environment will be destroyed at a stroke by the proposed clumsy cloverleaf design. Even with high earth bunds, trees and tall acoustic fencing looming above gardens, the lights, noise, vibrations and traffic fumes will ruin the area for wildlife and for people.

Previous representations about this junction have resulted in some potentially helpful changes but further review of the whole site could lead to an improved outcome for current residents and more direct access for vehicles. For example, locating the roundabout a bit further west and placing the bridge across the A361 at a slight angle could result in far less earth-moving. Looking carefully at the natural contours of the land is helpful. Residents in Uplowman Rd and Pool Anthony Drive would welcome further debate with DCC Highways officers (and possibly the landowner) to work towards a creating a decent, functional and cost-effective new intersection.

Additional access idea Several options for linking the EUE with the A361 were considered and rejected during the first consultation. However one option not mentioned was a possible new feeder road, going left off the new overbridge and running parallel to the A361 to join the unused northern 'arm' at Gornhay junction. This new road, above flood prone areas, could carry local traffic from the EUE into Tiverton town centre, avoiding the dangerous plan to feed it onto the fast-moving A361 for half a mile before exiting at Gornhay to travel into the town centre. The



notion that the A361 defines the edge of Tiverton is strange and seems to have no logic. It was only built in the 1980s!. The landowner has made land available for the big roundabout; he may well consider releasing a further narrow strip close to the A361 to support the safety of local motorists.

#### Access to Waddeton Park housing

I would support the idea of putting a road through part of the Pine Lodge site to take traffic to and from this new housing area, but it needs to be carefully surveyed and to take account of existing trees and wildlife.

#### Traffic management in the EUE

Once the new link to the A361 is finalised and built a plan for the entire EUE is needed, to avoid all traffic driving to Tiverton town centre through the Blundell's School Campus. Proposals for 'traffic calming' do not address the issue of traffic volume, highlighting the immediate need for a holistic travel plan to be drawn up for the whole EUE, based on present traffic flows during ordinary weekdays during term-time. Developing road links piecemeal will simply not work for a development of this size.

#### **Balance between employment and housing**

The reduced amount of employment space and the smaller number of houses now planned are welcome, in the interests of realism given the fragile economy and also residents' declared wish to maintain the character of the Post Hill residential area. To reduce housing targets to around 1500 and industrial space to 35,000sqm is more realistic than previous proposed totals.

However, marketing plans for the employment area should target small to medium sized businesses and not seek to attract warehousing in the EUE. If the employment zone is designed to provide local employment then small units are vital and not large mechanised warehouses or power plants.

Housing targets including a mix of affordable as well as market housing are suitable for this development. There should be a range of homes designed to suit families, single people and the elderly. Both larger and smaller gardens should be planned, to attract and encourage development of a strong community. Please also bear in mind the local building traditions and styles of this part of mid-Devon when it comes to house design and road layouts in residential areas. There is more to design than rows of tall red-brick buildings; we do not need another Moorhayes here.

#### **Infrastructure: power supplies**

Houses and industry both require power. How ready is the Tiverton EUE area to service a big development with vastly increased demands for power?

#### **Electricity**

The EUE needs modern underground power supplies that should be more reliable than the present flickering lights we experience in the Post Hill area and occasional power cuts during periods of stormy weather which can affect overhead lines.

Study of supporting evidence in the Utility Services Availability report from Robson Liddle, Consulting Engineers (dated January 2013) reveals some startling

deficiencies. The section from Western Power Distribution states that there is some 'spare' capacity on the existing 11kW system, but development in this area would initially require a new sub-station (up to £70,000) and once a load of 3MVA is exceeded 'a new primary substation' at a cost over £2 million to supply the Eastern Urban Extension. These supplies would need to be delivered underground and form part of the essential infrastructure. How is this to be financed?

### **Gas**

Currently the Blundell's Road and Post Hill area is served by two gas mains, at low and intermediate pressure. A paragraph within Appendix B states 'It does not appear that the network is sufficiently sized and this triggers large amounts of specific reinforcement.' The high pressure gas supply network also requires 'large amounts of specific reinforcement'. The paragraph concludes 'It is recommended that the development's gas demands are re-evaluated or alternative locations for the development sought.' This note dated December 2012 from Wales and West Utilities highlights a need for major investment in the gas pipe network to support the EUE new homes and businesses; a substantial part of the infrastructure that must be costed and planned before any building work begins. How will this be paid for?

### **Telecommunications**

It is good to hear from BT that there are 'various overhead and underground cables within the study area and no capacity issues serving the new development have been identified based on the various locations of this plan.'

### **Water supply**

Paragraph 2.3 of Robson Liddle's report on utilities states that there is capacity to supply water for up to 535 residential units and 3.2 ha of employment; 'beyond this SWW would need to review the balance of the development provision within the allocation.' Translated, it appears present pipework will only support up to one third of the 1500 houses and half of the 7 ha of employment land development planned. This signals the need to draw up a comprehensive plan for the whole site and provide the mains infrastructure at the start. Another essential part of the investment in infrastructure.

### **Sewerage**

Paragraph 2.5 of Robson Liddle's report on utilities states 'there is capacity to accept flows from the proposed development for up to 535 residential units and 3.2 ha of employment without the need for any offsite reinforcement works. Beyond this, SWW would need to review the balance of the development provision within the allocation.'

Surprisingly, this section of the report also states 'The Tiverton Waste Water Treatment Works also has capacity to accept the whole development without further investigation or improvement works being undertaken.' In view of local observations, including the periodic use of tankers to move effluent on occasions, I am unclear what SW Water's confidence is based on. Clarity is needed urgently on whether the Collipriest Works can realistically take sewerage from an additional 1500 homes plus the waste from 7 ha of businesses on the employment land.

### **Surface water drainage**

National policy requires the use of sustainable urban drainage systems (SuDS). Devon's geology poses challenges in this regard, with only 19 per cent of the county area naturally suitable for SuDS. (NERC 2013) Much of our local area has a high percentage of clay in the soil and subsoil and we are familiar with the waterlogging that so often results in wet weather. We see how fast our rivers rise due to runoff in wet weather. The challenge of how to develop the EUE with sustainable, on site surface water drainage, on acres of soil that presently become waterlogged in wet weather and where lanes often flood for days on end (eg Uplowman Rd, West Manley Lane) is a major and expensive task. This infrastructure will be very costly and to be successful will require careful engineering and planning.

Failure to do this will inevitably lead to runoff damaging the fragile Tidcombe Fen and potentially increase levels in the river Lowman and its floodplain.

While porosity pits in site surveys within the Utilities Report indicate some areas of the EUE as suitable for soakaways, as a local resident in the EUE area I find that soakaways are unable to deal with roof runoff, even in summer, and the ground is waterlogged for weeks on end in winter. After an hour of heavy rain, the road culverts back up and our residential road floods right across from one pavement to the other. Drainage will be a significant challenge, certainly in the northern sector.

As new roads are constructed, DCC Highways will have an important role to play in the management of surface runoff in the EUE. Where banks and bunds are constructed it will be essential to provide for the passage of groundwater to prevent surface flooding around the margins of these features.

### **Acoustic measurements**

Given the present increase in road noise from the North Devon Link Road, particularly evident since it was resurfaced, Waddeton Park Ltd. commissioned an acoustic study from Innovate Acoustics, in spring 2012, prior to their submission to build in the NE corner of the EUE, near the A361. The study measured sites across the whole area and recommended that consideration be given to the orientation of certain properties to ensure noise levels in their 'external amenity areas are maintained below the 55db (A) criterion quoted by the World Health Organisation.' (WHO) A strip alongside the A361 was shown to be unsuitable for development due to high noise levels and bunds and planting were recommended at detailed design stage to mitigate the effects of road noise on development in the northern part of the EUE.

### **Waste to Energy Plant**

In my view this is an irresponsible proposal to even suggest in a new development on the edge of a mid-Devon market town. You are seeking to develop and revitalise the town, not to drive residents away and deter new businesses and people from moving here. This cannot possibly be presented as having 'green' credentials; just think of the pollution from all the HGVs driving miles from north Devon and elsewhere to feed this plant to keep it going 24/7. Consider present residents and children in Blundell's boarding school living in its shadow, subject to vehicle noise, air pollution from vehicle emissions, smells and vibrations day and night, plus the invisible particulates that float in the air, invisible to the naked eye but damaging to the lungs. Dioxins and nitrous oxides are of particular concern. Even pyrolysis leaves

some residues. The tall chimney would be an unwelcome eyesore and would soon signal Tiverton as a 'rubbish town'.

All so the County Council can gain revenue from sale of power to the National Grid. Do we expect some large pylons to be put up next to this Plant? This would add greatly to Tiverton's attractions. And how would this enhance the view from Knightshayes that is so precious? What would it do to Paradise Lane and the nearby woods, with such delightful ecology and wildlife? Gone for good.

Please can this dreadful idea be despatched now. We need to hear no more of it. Alternatives can be found, for example at the site proposed at J27 which is not next to a school or part of a rural market town.

**L Clunies-Ross FRGS**

