

Masterplanning Consultation
Forward Planning
Mid Devon District Council
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TIVERTON EASTERN ACTION (T.E.A.)

Dear Forward Planning Team,

T.E.A. represents well over two hundred local residents who are concerned about the proposed Eastern Urban Extension (EUE) of Tiverton.

T.E.A. has a mandate to present a summary of consensus views reached by consultation within our membership, and during our carefully minuted public meeting at Halberton on April 23rd.

T.E.A., as a broadly representative residents' organisation:

- approves reductions, as compared to those in the AIDPD, in both housing and employment land allocations.
- welcomes lower housing densities in the Masterplan.
- appreciates and approves the greater emphasis given to Green Infrastructure and public open space.

In addition to contributing to a collective response through T.E.A., many of us have visited the Master Planning meetings and submitted our own detailed individual comments on the Options report.

We appreciate that the Eastern Urban Extension forms an important element of Mid Devon District Council's plans for future housing and employment needs. However, the significant changes in national and local economic and social conditions in recent years lead us to question the need for such a large development. As the AIPD and Core Strategy are revised during the next two

years, providing a fresh review of objectively assessed needs, we hope that both the size of the development and the current housing targets, will be thoroughly reviewed.

We are concerned that housing should not expand beyond forecast local needs, as, without a significant increase in local employment, this could lead to a pattern of unsustainable journey-to-work patterns. Tiverton, as a result, might increasingly become a dormitory town for larger settlements.

In relation to the current Masterplanning Options Report we are very concerned about a number of aspects and wish to contribute to its improvement in the interests of current and future residents. We want to work with developers, planners and other stakeholders in order to achieve the best possible outcome of any development for everyone.

We feel that the information provided in the Options Report is often unnecessarily limited. As a consequence, meaningful, evidence-based responses are problematic. In our view, such information as Traffic and Noise Consultations should have been made available, as well as links to the AIDPD, and, ideally, further links enabling residents to access and assess related information, such as housing projections and population predictions based on the 2011 census.

Parts of the report are confusing, especially 'Options for Access.' For instance, has Devon County Council stipulated that the traffic from an extra 1,000 houses can be routed via Blundell's Road (C769)(3.8), or have they still to make this decision? (3.14). Because of the limitations mentioned our responses must, of necessity, be of a very general nature.

We support a clear distinction between areas allocated for Housing and Employment, as indicated in Option 1, and we support a smaller area allocated for the Local Centre and Primary School, as well as the maximization of green links and open spaces, as represented in Option 2.

Options for Access (3.8 – 3.14)

In our view, the completion of much of the new transport infrastructure before major development takes place is an absolute priority.

T.E.A. is clear that the early completion of a new junction on the A361 is vital in order to retain the quality of life for existing residents. It is understood that there are constraints on location. The proposed siting poses potentially serious problems for residents in Uplowman Road. These might include, especially in the case of approach roads, very high noise levels and air pollution. If this precise location is to be seriously considered, residents would need a great deal more information as to how these likely impacts would be ameliorated. Without this detail it is impossible to judge whether the adverse impacts can be managed at this location in an acceptable way.

T.E.A. does not agree with the partial completion of the A361 junction, limited to a slip road bringing in westbound traffic. This would not only put much construction traffic on the C769, but it might become a tempting long term 'solution' in the event of a funding shortfall. (3.10)

The local impact of the potential increase in traffic along the C769 represents T.E.A.'s greatest concern. The proposed A361 junction would take little traffic from the new development towards Tiverton. Unless an alternative route is provided at an early stage, the traffic along the C769 would soon reach an unacceptable level, providing greatly increased noise and air pollution, as well as pedestrian hazard, for Blundell's School and particularly the Horsdon area. Whatever results and recommendations traffic modelling might produce, all these related aspects need to be fully researched and modelled.

In 2009, John Wilde, a Planning Inspector, when rejecting an appeal after a small development on the C769 at Hartnoll Farm, which had been refused planning permission on grounds of potential traffic generation, stated that, 'taking into consideration the constricted nature of the road at Halberton, and the considerable number of likely crossing movements at Blundell's School', this development 'would be detrimental to the highway network and consequently to the safety of local residents.'

The NPPF states that development 'should be located where practical to create a safe and secure layout which minimizes conflicts between traffic and cyclists

or pedestrians', and that 'encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion'. In our opinion, the western end of the C769, the major road link between the EUE and the town, cannot meet these requirements.

The temptation to take 'short-cuts' in planning the road network to avert the funding shortfall could almost certainly lead to damaging, and unsustainable, long-term problems.

In addition to the problems along the C769, the map summarizing constraints indicates that the A361 already generates very high levels of traffic noise. It is important that effective extensive mitigation measures are provided in areas 3 and 7 shown on this map, and possibly a rather wider area that is allocated for housing: a recent, very limited, survey commissioned by Waddeton Park Ltd. produced a significant proportion of noise level results at unsatisfactory levels with likely 'health hazard' implications. (>65dB).

Many residents of Halberton, Uplowman and Ash Thomas have expressed considerable concerns about the potential increased traffic from the EUE along roads which are already experiencing enhanced traffic levels with associated problems, and we are concerned that this issue needs to be addressed as the development progresses. The same applies to potential 'rat-running' along Tidcombe Lane.

We are concerned that, in order to resolve these potential problems, all options for a relief road north of Blundell's School should be reconsidered. It is important, in particular, that Blundell's School should be engaged in this process. This historic school's fundamental interests are involved, and it also holds land which, although not within the development area, might possibly contribute to an optimal solution for the school, residents of Gornhay Orchard/Coleman Close, and those living further west along Blundell's Road.

Housing Types, Tenures and Quality (3.16)

The NPPF stresses that 'it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.....good design is a key element of sustainable development, is

indivisible from good planning, and should contribute positively to making places better for people'. We thoroughly concur with these objectives and agree that housing in the Eastern Urban Extension should be designed to the highest possible specification, with architectural variety and a mixture of tenures and types, avoiding the uniformity and high densities exemplified in much of the Moorhayes estate in Tiverton.

The Post Hill area enjoys an excellent quality of life and residential house prices are high. This represents an opportunity for developers to 'go for quality' in a way which should be profitable, but should also contribute to the perceived status of Tiverton as a community and as an economic destination.

T.E.A. wishes to see high quality design and exceptional environmental and lifestyle quality. Local residents involved in T.E.A. would welcome the opportunity to 'co-create' an exceptional development in our area.

Topography and Landscape Sensitivity (2.4)

Much of the north-facing slope in Zone 5 (Option 1) is exposed to views from a wide area, including the A361. We consider that any new house building on this site would produce a negative visual impact, and should therefore either be refused or very heavily screened.

For similar reasons residential development close to, and along the crest, of the ridge in Zone 12 (Option 1) should be avoided.

Flood Risk and Sustainable Drainage (3.6)

The NPPF states that 'when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding informed by a site-specific flood risk assessment'.

Flooding in the valley of the Lowman, and its tributary, the Ailsa Brook, is a chronic issue, the impact having been especially severe in Tiverton during October 2012. We have concerns about the potential effects on direct surface runoff and groundwater of a large development with many impermeable surfaces. We would need to be assured that these could be satisfactorily

mitigated, swales, ponds and soakaways being of limited benefit in an area where soil infiltration is very limited for much of the year.

Extreme weather conditions appear to be becoming more frequent and the use of past flows to predict flood recurrence intervals is becoming problematic, even with an allowance for the effects of global warming. Therefore, considerable improvements to the Lowman's flood defences, as well as targeted protection of Craze Lowman and the nationally important Tidcombe Lane S.S.S.I. , may be needed before the completion of most of this development.

Waste-to-Energy Plant (3.5)

We agree that the Eastern Urban Extension at Tiverton has potential advantages as a location for a Waste-to-Energy Plant, being close to major transport links, and we would especially favour such a solution if heat and energy produced could be sold to local housing and/or industry. We have an open mind about the safety and environmental impact of the processes involved in this type of plant, and, before responding, we would consider the size and technology of the plant proposed in any future planning application. TEA would need to be convinced that any possible negative impacts, such as noise, noxious fumes and other forms of air pollution, would be negligible; and that any adverse visual – and reputational - impact would be very limited.

It is essential that such a plant should be built after the completion of the complete A361 junction and located as far as possible from existing housing, ideally in the north-west part of the land allocated for employment in Option 1 (Zone 2). It would seem sensible to construct the plant before the building of any housing nearby, so that future residents are engaged by appreciating future benefits, such as area heating, rather than alienated by the subsequent imposition of something unwanted near already purchased homes.

Utility Services – Sewerage (2.2)

Much of the sewage from recently built housing estates in the Tiverton area is drained into holding tanks which are emptied into road tankers which are driven to the South West Water Treatment works for processing along the un-adopted Collipriest Lane, this road being a

highly inadequate conduit for such frequent movements. The resultant sludge is returned along the road for disposal elsewhere.

The present infrastructure is completely inadequate to cope with a large increase in use and we consider it to be essential that, in the event of any future development occurring in the Eastern Urban Extension, adequate new provision is made for both the movement and treatment of sewage.

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