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Tiverton Masterplanning: Options Report May 2013

INTRODUCTION

The proposed Eastern Urban Extension is a massive project for residents to consider. If a commercial organisation had presented a Masterplanning: Options Report such as the one MDDC have put forward, they would have been lambasted for incompetence and unprofessionalism.

How can residents be expected to make judgments and answer the questions posed when they are presented with a document lacking in any clarity or detail, full of schoolboy errors and omissions, and deficient in detailed data and analysis.

POPULATION DEMOGRAPHICS AND PROJECTIONS

In May 2009 the High Court ruled that DCLG (Department for Communities and Local Government) and GOSW (Government Office for the South West) had not considered "reasonable alternatives" and that the expectations of population growth were extortionately high. This over-exaggeration of the South West's housing targets has continued at a local level in Tiverton.

From the very beginning of the process Mid Devon Planning Officers have been unable to give consistent information in relation to the predicted growth of Tiverton through to 2026.

The DCCSIU commented in January 2009 that the Mid Devon Planning Officers' "projections"..."were wildly optimistic at the time and are even more so now"

Currently we are presented with a Masterplanning: Options Report which continues to perpetuate the wildly over optimistic levels of housing required for Tiverton.

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) which could not be sustained in Tiverton. This only continues because Tiverton has forged ahead with a large building programme of housing far in excess of local needs, offering cheaper housing than that available in Exeter or Taunton.

There is an abundance of empty employment space in the Tiverton area. The Options Report should not be looking to provide unwanted employment space but to concentrate on housing and infrastructure for the retired and elderly, which is forecast to be the largest sector increase over the next twenty years (65% increase in age group 65+). House occupation in this group is 1.4 persons per household (pph) not the national average of 2.4 pph on which the Core Strategy figures were based. This further underlines the unreliability of the statistics for housing requirements.

If the original Core Strategy figures presented by MDDC were to be believed almost 50% of the provision will be met without the investment needed for an Eastern Urban Extension on the massive scale proposed.

Before planning is given and ground broken at Post Hill it can only be hoped that the upcoming 2013 Review Plan by MDDC of the required land needed for the next 20 years will commission a proper analysis of the housing required for Tiverton and acknowledge that J27 must be the first development for any employment land – see comments below.

FLOODING

West Manley Lane NGR SS91 97/9812

The fields either side of WML slope gently down to the water course of Ailsa brook. In the living memory of the residents it has always been subject to periodic surface water flooding due to run-off and blocked drainage ditches from the surrounding grade 1 and 3 farmland. However, since 2006 the extent of flooding has increased, especially in the following areas of the lane:

North end adjoining Blundell's Road GR978132

These floods have been responsible for serious damage to three cars belonging to residents. This degree of surface water flooding has occurred since the conversion of farm land to sports fields for Blundell's school (GR SS 978128). The height of the sport fields was increased by some 4 feet by the deposit of spoil excavated from a development in Tiverton. This now forms a barrier to the run off from the opposite fields and coupled with the resulting hard compacted ground is now unable to absorb surface water resulting in significant flooding of the lane.

WML south – Prowses Cottage and Rosebarn GR984125

Given that the Environment Agency acknowledges that surface water flooding is notoriously "*difficult to predict and pin point*", building on the fields surrounding WML will greatly magnify this problem.

Recent evidence of increasing flooding in and to the south of WML has not been factored in to the Options Report.

Fields south of WML, and between Ailsa Brook and the Railway Walk

This area has not been assessed for flood risk and is of great concern as Option 1 clearly shows intent for development within this designated risk area.

Ailsa Brook runs through the field situated between Chapel Anthony Lodge and Rosebarn (GR 982124). At this point it is subject to flooding following heavy rain particularly in the winter months. It then passes through a culvert beneath the original track of the Great Western Railway (GWR) now known as the Railway Walk. This is unstable and, on its south side is collapsing; it frequently blocks with

vegetative debris which adds to the flooding of the brook. Communication with MDDC and DCC (July 2009) suggests that no one authority is either aware of ownership of the culvert or feels liable for its upkeep. Specific responsibility must be determined to reduce the flood risk at this point before any development is allowed.

Ailsa Brook and Tidcombe Fen SSSI

The choice of this area for use as building land has been proposed *without* an up-to-date risk assessment on the causes and extent of flooding associated with West Manley Lane and Ailsa Brook.

It appears to lack the current scientific evidence required to show the impact of flooding, there are no specific plans to alleviate flooding within this area.

For this reason it is proposed that the area south of the lane is not built upon but that the area is incorporated into the green infrastructure. This will "provide a focus for flood prevention, natural enhancement and biodiversity through the provision of ponds, swales and other soft areas, which can serve as dual use for both public open space" and be maintained in its present form as a wildlife thoroughfare and unpolluted rural footpath.

TRAFFIC

The completion of much of the new transport infrastructure before major development takes place is an absolute priority.

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 location 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 about 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.

The local impact of the potential increase in traffic along the C769 represents the 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 modeling might produce, all these related aspects need to be fully researched and modeled.

In addition to the problems along the C769, the map summarizing constraints indicates that the A361 also generates very high levels of traffic noise. Before any further decisions are taken it is essential to commission a proper traffic modeling report and noise pollution predictions.

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. It also holds land which, although not within the development area, might contribute to an optimal solution for the school, residents of Gornhay Orchard/Coleman Close, and those living further west along Blundell's Road.

To the south of the EUE.....

West Manley Lane comprises of a single track road approximately 1.5kms in length, leading south then east from Blundell's Road at GR SS 977131, to GR SS 988126, with the lane centered at National Grid Reference SS91: 981126, it is bordered along the majority of the lane by the original Devon bank. An increase in traffic flow is not achievable without destroying that hedgerow and realigning the road configuration; it has already been an issue in the refusal of planning permission for use for employment in some buildings in Sweet Meadow (out buildings of the former West Manley Farm).

RE-DESIGNATION OF 11.43 HECTARES TO THE SOUTH OF WEST MANLEY LANE AS GREEN INFRASTRUCTURE

The area of land extending to 11.43 hectares to the south of West Manley Lane should be included as part of the Green Infrastructure Protection.

This is a low-lying area prone to flooding and which would form an attractive green corridor between the railway walk and West Manley Lane, both of which are popular for walkers, runners and cyclists.

M5 JUNCTION 27

Land at J27 is currently in demand, presently available and requiring little or no public funding. It provides potential business enterprises with the required motorway communication and the means to construct modern facilities, whilst bus, train, bicycle and road transport facilities for employers already exist. In this age, the concept of "sustainability" meaning the ability to 'walk to work' is surely unrealistic for the majority. Of the sixty per cent of employees currently 'out-commuting' from Tiverton many are already passing through J 27 by one means or another.

Opening up this land at J27 would give planners the scope to ensure that any industrial units in the EUE were smaller but with higher employment numbers. It would have the added advantage of reducing the number of large HGVs needing to visit the EUE units.

Providing for smaller local employers would also avoid the volatility in the labour market created by large footloose multinational companies, as has been demonstrated by factory closures in Plymouth and Torquay during the current recession, and in Tiverton's recent past 'Reuters' and 'Two Sisters'.

In 2006 the Secretary of State was unable to sanction the use of land for business development at J27 for technical reasons within the changing planning rules; the concept was not, as has been believed, ruled out. Thus if the MDDC were to seek an addendum to its current plan and re-address the issue of the lack of employment land, then J27, like other similar areas within the M5 corridor, would provide a quick but long term answer to chronic lack of employment potential.

If this was achieved, whilst it would not take away the need for development in the EUE, the amount of land required for seemingly inappropriate industrial development within this semi-rural setting, would be reduced. At the same time this would decrease the total amount of land needed for housing and associated amenities and allow for a more sensitive approach to planning.

EASTERN URBAN EXTENSION PHASING AND FUNDING

Initial phasing of any development of the EUE will need to provide suitable access to the sites. The decision on appeal by the Inspectorate (30.10.09), to refuse further development at Hartnoll Farm on the grounds that the additional traffic generated would not be acceptable on the roads serving it, involves the same roads that serve the EUE area i.e. Blundells Road and the road through Halberton Village. The vehicle movements created by the development and ongoing use of the EUE will be far in excess of those created by the Hartnoll proposal.

The options presented indicate that infrastructure for industrial development will be close to the A361 and will need to be in place prior to the start of any housing development in order to give vehicle access to the housing sites beyond. Potential developers are unlikely to fund these very high costs long before they see any return from housing.

An estimate of £120 million has been given for the infrastructure for the area over the period with a figure of £60 million for the EUE (£35 million originally to be raised by a Community Infrastructure Levy). From this, around £20million will be required for the links/junctions on to the existing road network.

MDDC should not forget the commitments already made:

“The occupation of no more than 200 dwellings and 10,000sqm employment floor space before the opening of either the A361 Junction and or the Heathcoat Way Link.

and

“the occupation if no more than 1000 dwellings before the opening of both the A361 Junction and the Heathcoat Way Link”.

Funding

The public has been given very little information on how the Eastern Urban Extension will be funded and certainly not the sort of detail to be able to make objective comments. What is clear is that MDDC's original plans of funding the road infrastructure through raising £35m from the Community Infrastructure Levy has been proven to be 'pie in the sky'.

MDDC needs to provide a detailed and realistic funding plan for residents to interrogate.

MDDC already recognizes that the high cost of the access to the link road could undermine the viability of the development and states that the council will seek external funding to support the development. Fund planning on this scale is central to the soundness of the EUE and yet no explanation of where the shortfall will be sourced is presented. In the current economic climate of austerity and prudence, this somewhat cavalier attitude to what is a major aspect of the EUE exposes the MDDC to a financially unsound project.

CONCLUSION

It is strongly recommended that MDDCpause..... commission the research..... get the facts and review whether there truly is a need to destroy 153 acres of agricultural land with views of the mid Devon rolling countryside.

Please recognise what we have and do not destroy it for future generations otherwise an alternative vision may well be:

AN ALTERNATIVE VISION FOR 2035

What was once 153 hectares of productive agricultural land with wide sweeping views to the Grand Western canal has, over the last 20 years, disappeared under concrete. The 2000 homes that have been built have ensured that Tiverton has become a dormitory town for Exeter and Taunton. Every day over a 1000 cars leave the Post Hill estate and head for the M5 and work. The funding that was to be delivered by MDDC to build a new junction on the A361 never materialised due to its wildly over- optimistic estimate of the Community Infrastructure Levy contribution of some £35 million; in the meantime the villages of Halberton and Sampford Peverell are continually clogged with traffic.

In his **AIDPD examination report September 2010, paras 3.48 & 3.49** the Inspector warned MDDC of the likely planning impact of an estate at Post Hill when he reported the potential for adverse impact on:

- Existing residential and community development.
- Road traffic levels.
- Flood risk.
- Visual amenity of the Grand Western Canal Conservation Area and the adjacent landscape including the former railway line.
- Wildlife and ancient hedgerows in West Manley Lane.
- Best and most versatile agricultural land.

As far back as 2009 the High Court ruled that the Department for Communities and Local Government (**DCLG**) and the Government Office for the South West (**GOSW**) had not considered 'reasonable alternatives' and that the expectations of population growth were extortionately high. The over-exaggeration of the South West's housing targets continued at local level in Tiverton. Time and again MDDC were challenged on the numbers of houses required to be built and employment space required. Their forward plans for population growth and development were regularly challenged as being based on inconsistent and unreliable data. Sadly this has proven to be the case for Post Hill today, being an example of the worst of urban living in the South West and a product of the wrong priorities in the earlier part of this century.

The parents of a child killed crossing at Blundell's School have taken their case to the European Court of Appeal and, if successful, MDDC are likely to follow other local authorities that have displayed poor strategic planning and lack of management and risk bankruptcy. The Post Hill estate is a fitting epitaph.

