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Campaign to Protect Rural England
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MID DEVON CPRE GROUP

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To: Ms. Liz Pickering,
Planning Officer,
Forward Planning,
Mid Devon District Council,
Ailsa House,
Tidcombe Lane,
Tiverton EX16 6PP



30th May 2013

Dear Ms. Pickering,

Re: The Tiverton Eastern Urban Expansion – Masterplanning: Options Report.

I am writing on behalf of the Mid Devon CPRE Group as the Group's secretary to thank you for kindly sending a copy of the above report to the Group. This has been very helpful and very much appreciated.

The Options Report for the Tiverton Eastern Urban Expansion has been discussed by our Committee Group at our recent last meeting and I am enclosing a copy of the Mid Devon CPRE Group's response to the above. I would like to say that we found the document concise and helpful with helpful Map Plans apart from the rather confusing ones for Options 1 and 2 which use a different format from each other so are therefore difficult to compare.

Thanking you once again for sending the document copy to the Mid Devon CPRE Group,

Yours sincerely,

Copies to: The Mid Devon CPRE Group Committee members.

Response to: Tiverton Eastern Urban Extension (Tiv EUE) 29th May 2013
Masterplanning: Options Report (OR), Mid Devon District Council (MDDC)

Question 1 – Do you feel that the balance between employment land and housing development is appropriate? If not, please explain.

- CPRE finds it difficult to assess whether the balance for the above is appropriate as some housing will inevitably be taken up by retired people. It is important for there to be adequate employment land available as many brown field sites in Tiverton itself have been used for housing rather than employment land presumably due to access problems within a constricted built up area. CPRE also believes that it is important for the employment land for the Tiv EUE to be kept to the north of the area as proposed in Option 1 p. 18 of the OR as this will provide good and shorter access to the A391 and therefore be sustainable in accordance with the Government's National Planning Policy Framework (NPPF).

MDDC's Alterations & Infrastructure Development Plan Document (AIDPD) states in Policy AI/TIV/1 p.60 para. 5.9 that the policy for the development of the Tiv EUE was based on evidence available to the Planning Authority at that time when preparing the AIDPD (that is prior to 2010) and further states "However, it is important that the policies of this document are not seen as rigid and unalterable in the light of new evidence." The recent projection figures for households needed for Mid Devon for 2011 to 2021 from the Office of National Surveys has projected a reduction of about 3 1/2% for housing in Mid Devon. CPRE wonders if Mid Devon Local Authority have taken account of these latest figures which are substantially reduced for the Tiv EUE? Therefore less housing would be needed than originally perceived for the AIDPD when adopted in October 2010. The Government too has reduced the housing density, another factor for consideration. It would follow that if a balance is to be maintained between housing and employment land that the need for the latter would also be reduced. The two combined, CPRE believes, would therefore require less use of the Tiv EUE site as a whole leaving more land available either for Green Infrastructure and Open Spaces or for agricultural land, an important sustainable and finite resource.

Question 2: A Vision for Post Hill: Illustrative Year – 2035. Do you have any comments on this vision?

- CPRE like many others regrets the loss of productive and rich quality farm land, Grades I & II, due to the expansion of Tiverton under the Tiv EUE but given that the matter of development is a decided factor, the proposed vision with its aspects of Green Infrastructure, the interplay of the landscape, the Grand Western Canal and the residential Community set in a green setting interspersed with green corridors, public open spaces and the retention of special features (e.g. the tumuli to the north, hedgerows, trees) are qualities to be aimed for right from the outset. The area could be a flagship opportunity for the above elements coupled with good design as well as respecting the locality features e.g the Tidcombe Fen, the green buffer zone near the Grand Western Canal, cycleways and green ways together with the listed buildings (AL/TIV/3 p.67, para.5.28) and vernacular architecture in the West Manley Lane area. This is feasible with good overall design and planning such as at Poundbury, outside Dorchester, and, closer to home on a small scale, Itton Park at Bow with its variety of well designed housing and green space as a children's play area. Gardens too are important as a sustainable quality for the well being of people's lives as well as for the biodiversity they help to encourage. Ponds too are of like benefit

What is of concern and problematical is the level of traffic such a large development will inevitably bring to the area and the detrimental effect of CO2 emissions and noise levels especially on the road through Blundell's School which is both an important employer and which offers a historical green quality to the area.

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Question 3 – The masterplan will need to take account of and enhance natural/environmental features of the site and its surroundings. Are there existing environmental features you would particularly like to be protected or enhanced?

- CPRE welcomes in Section 2.0 of the OR, p.4, that a "Zone of Visual Influence" is to be considered followed by a full Landscape and Visual Impact Assessment. It is hoped that the public will be given the opportunity to comment on this and that the findings of the above will be acted on to enhance the area by retaining local features e.g. trees (to be protected by TPOs), hedgerows where possible to include further planting of trees, beneficial both for visual considerations but also as mitigating factors for screening and absorption of CO₂ emissions as well as providing habitats for biodiversity creatures. CPRE would also welcome the recognition and protection of water features such as the important Ailsa Brook which feeds Tidcombe Fen and other streams in the locality. CPRE would like to see the creation of ponds within some green areas. These would help with SUDs and run-off from development as well as providing a further diverse habitat giving enjoyment too for those living in the locality. Such features as ponds have been used in employment developments elsewhere in South East England e.g. Hartley Wintney not far from the M3.

CPRE would like to see West Manley Lane protected and enhanced as it is a traditional Devon lane which is to be valued for its hedgerow banks and special quality. Such features are visible from the Grand Western Canal which overlooks the area and value has been placed on the Canal area by the Inspectors at the Examination in Public for the AIDPD for its special quality and the economic benefits it brings due to it being an attraction for both tourists and local people alike.

CPRE would also like to see retained and protected the integrity of the steep sides of the ridge north of West Manley Lane as shown and mentioned on p.6 of the OR for the Site Topography Map and para. 2.5, 2nd paragraph.

Question 4 – How do you think the energy needs of the development should be met? Do you support the inclusion of an energy centre and district heating scheme?

The AIDPD gives information on various forms of renewable energy in Policy AL/IN/6 p.43 and CPRE would support Solar Panels on individual houses and good insulation, both provided by the developers. The cost of the solar panels could be absorbed within the cost of the house. The AL/IN/6 also refers to small individual wind turbines suitable for installation on houses which also sounds like a good use of discreet and sympathetic resources. CPRE would also advocate the above two sources of renewable energy on schools as is already happening, offices and other employment facilities. Solar panels on roofs are a good way to maximise energy without using extra land unlike solar panel farms which use extensive land areas and which CPRE would not support.

CPRE does not support an energy centre or district heating scheme as this, due to the size and scale of any large scale proposal would have an adverse impact on the whole area. To serve the whole Tiv EUE area the design, scale and size would have to be extensive and would be an eyesore for the locality, thereby not only adversely affecting the quality of residents lives but also impacting on landscape views from many different points from the Tiverton Golf course, Blundells, and the Canal as well as from other area view points. Other forms of renewable energy to feed such a centre could also require the bringing in of products by road. This would be unsustainable as this would require fuel usage for transport and also costly. How too would it be phased? – not to mention any break downs on such a large scale.

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Question 5 – The development will increase traffic. How should this be dealt with and where should the new highway junction to the A361 North Devon Link Road be located? How should the traffic calming enhancement of Blundell's Road take place? When should highway improvements be provided?

- CPRE agrees that, as is shown on the Option for Access Plan, the Purple Junction link to the A361 is the best option as it would be close to the employment area of the Tiv EUE thereby improving shorter distances to travel for employment deliveries.

Because of the increase of traffic due to the Tiv EUE and its detrimental affect on Blundell's Road, CPRE believes that it is imperative, before any development takes place, for the north road infrastructure to be in place whether routes Red Option A or B as they provide connecting roads to the Purple Junction. The early connections and roads would prevent Blundell's Road from becoming a rat run especially if traffic calming measures were put in there at the same time. Without this early road provision, the situation along Blundell's Road especially with HGVs needed for supplying building materials for the Tiv EUE development and landscaping would be impossible and very dangerous for the Blundell School students. Traffic calming measures with large amounts of traffic would increase harmful CO2 emissions affecting both residents in the area and the School.

The Cranbrook Road linkage near Exeter has been put in place before any buildings so that it seems reasonable and feasible for the same to happen at Tiverton with routes A or B and the Purple Junction to the A361. There is also a risk if these matters are delayed that such routes would never be provided as has happened with the Crediton by-pass.

Question 6 – The residential element will provide a range of housing types and affordability. What types of housing would you like to see? Where should it be located?

CPRE supports a mixed use of housing types – market housing, affordable and social housing of various different sizes and materials as well as sheltered housing for the elderly or disadvantaged. As already mentioned in responding to Question 2, good design and a variety of styles is important as well as interesting layouts. The higher density would be more acceptable near the proposed "Possible local centre location" as shown on the Plan p.14, Concepts and opportunities with lower density to the south and along the ridge. CPRE does not support development in area 4, OR p.14, as this would have an adverse impact on the existing settlement of listed buildings and dwellings in the area of West Manley Lane as well as affecting views from the Tiverton Canal.

CPRE does not support 3 storey dwellings as these are more suited to a town or city environment and unsuited to a market town expansion area and more obtrusive in sensitive landscape such as the Tiv EUE. This especially applies to houses built on the ridge.

CPRE believes that adequate parking should be provided especially near any school or near any local centre location with facilities for a Community Hall or local Doctor's surgery. Regarding surfaces for parking or hard standing, CPRE believes that these should have permeable surfaces to alleviate flooding problems or water run-off.

CPRE welcomes the provision for gypsy or traveller pitches in the area as there seems to be a problem for such provision.

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Question 7 – The urban extension proposes employment floorspace. What types of employment should this include and where should it be located?

- CPRE supports a mixed variety of employment areas ranging from A1 (small shops) located near the "Possible local centre location" p.14, OR, and other uses A2 (Finance and other) with larger employment uses to be located to the north of the site in order to facilitate accessibility from the A361, the North Devon Link Road. A family pub similar to the Red Stag at Crediton on the Tesco's complex would be an added attraction for families and the elderly which provides many jobs for young people. Such an employment venue could be close to the above mentioned "local centre location." Care needs to be taken as far as the amount of shops are concerned not to detract from Tiverton Town Centre itself which could lose custom and become a ghost town. There is already a need to boost the town centre. There should not be the risk of Tiv EUE becoming a town in itself rather than being the intended expansion of Tiverton Town.

Question 8 – The masterplan will provide major areas of green recreational space. What should this include?

- This should include informal as well as formal recreation grounds, providing picnic areas and be linked to dwellings by Green Infrastructure via walking and cycling green routes. CPRE very much supports the whole concept of Green Infrastructure (GI) and although the finalised document for MDDC's GI has not been published, the preparatory documents, which CPRE supported and commented on, provide a good basis to work with especially for Tiv EUE. Both Options 1 and 2 are providing suggestions with Option 2 seeming to provide more routes and linkages.

Question 9 – The local centre is proposed to include local shopping facilities, community hall, provision for children and youth. Where should it be located? Are there any community facilities or other services you would like to see in the local centre?

- CPRE supports the "Possible local centre" as located on the plan on p.14. It has easy access from the Blundell's Road and GI routes would link to it in both Options 1 or 2.

The following are some suggestions for the local centre:- A doctor's surgery, recreation ground for youngsters to play ball games and for other informal sport, the community hall to provide pre-school and/or play school facilities, a venue for meetings (Hatherleigh Community centre is a good example for all of these), some tennis courts, a bowling green, a skate park. Although Tiverton has a very good skate park this is unfortunately some distance away on the other side of Tiverton, too far for youngsters to go by themselves unattended. Skate parks provide a good social element and exercise for youngsters and lads. There is a demand nowadays for allotments which provide not only productive facilities but also provide social benefits and well-being. These could be in some allocated areas near to dwellings.

Question 10 – Please comment on the two emerging development options. Of the two options put forward, do you have a preference?

- This would seem to suggest a choice only of Option 1 or 2 but there are both positive and negative elements in both. An amalgam of the positive elements from both would be preferable. It is also difficult to make a valid comparison because the maps use a different format from each other. This is unlike MDDC's previous documents which have used the same format when there have been option choices.

Regarding Option 1 CPRE supports the location of the mixed use local centre, the school – but a primary route seems to pass through it, and the employment area being in the north. CPRE does not support the residential areas no.14, p.18, as this adversely affects the area south of West Manley Lane with its listed dwellings and views from the Canal.

Regarding Option 2 CPRE supports the GI plan because of offering more green spaces and routes and retaining a green area south of West Manley Lane, p.21, para.3.26.

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Question 11 – Overall, do you agree with the proposed scope and content of the proposed masterplan document?

- Overall, CPRE agrees with the proposed scope and content of the proposed masterplan document as detailed on p.24. It would be helpful for a map to be produced to show the proposed phasing of the development.

The Community Infrastructure Levy could be mentioned as funding as this has now come forward.

Question 12 – Do you have any other comments to make on the proposed masterplan document?

- Other comments as follows:-

- (a) There is a need for clarification of the two maps for Options 1 & 2 in order to compare them properly.
- (b) CPRE believes that there is a need to amalgamate certain criteria of Options 1 & 2.
- (c) A longer time scale in which to respond to the consultation would be helpful. A month is not a very long time within which to respond about very complex issues. 6 weeks would be preferable.
- (d) Regarding the public displays of the document, it would have been helpful to have had a display at Ailsa House especially as there is very good parking facilities.
- (e) Orchards have been briefly mentioned in the masterplan but only one is shown which is on p.22, Option 2. Orchards give great pleasure to people as well as being productive and are or were a traditional element in Devon. CPRE would like to see other orchard plantings elsewhere in the Tiv EUE.

Question 13 – What status? etc. I am responding to the Consultation on behalf of and as secretary for the Campaign to Protect Rural England – Mid Devon CPRE Group which is a Statutory Consultee.

Question 14 – Members of the public only etc.

- Although representing the above organisation, I do live in Mid Devon and have done so with my family since the mid 1960s. I am a regular visitor to Tiverton and the surrounding area including Knightshayes and the length of the Grand Western Canal, both cycling and walking.

Mrs. Julie Rudge – Mid Devon CPRE Group secretary.
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Morchard Bishop,
Crediton,
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