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Forward Planning & Conservation

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Dear Sir / Madam

Mid Devon Tiverton Eastern Urban Extension (EUE) Masterplanning: Options Report May 2013

Comments on behalf of Blundell's School

The below comments are submitted on behalf of Blundell's School in response to the above consultation exercise currently underway. These comments follow our attendance at the urban extension land owner meetings, attendance at the Site Allocations DPD Examination and representations to the various Local Development Framework consultation documents. The School has also been in direct contact with representatives of the landowner consortium.

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

We are aware of concerns regarding the extent of employment floorspace within the original allocation in terms of market deliverability. We understand that initial masterplan work by the landowners is demonstrating a significantly lower amount of employment floorspace than the 95,000 to 130,000 sq.m. proposed within the original allocation. The key implications of the employment floorspace level will be the split of proposed B class uses as this will have major implications for job generation figures and therefore traffic movements. The School is keen to ensure that the development provides a level of self-containment and doesn't result in a residential development with attached B8 use class distribution hub generating low levels of jobs, significant HGV trip generation and high levels of out commuting by residents.

The balance of employment and residential development will need to be carefully monitored throughout the extent of the development to ensure a degree of self-containment is maintained.

The fundamental concerns of the School are around the impact of all aspects of the EUE in terms of traffic on Blundells Road. We will major on this topic under Section 5 below. This road has a major effect on the School and the safety risks of both pupils and staff. As you will know the school is completely bisected by Blundells Road. Thus, a much reduced level of both employment and housing allocation is to be welcomed. However these fundamental anxieties and concerns are only really addressed by the proposed new link onto the North Devon Link Road (A361). The School urges that a level close to 40,000 sq.m. of potential employment development would be a massive improvement - and be more realistic - than the initially suggested figures in our first paragraph on this topic above.

Our clients wish the local authority to fully understand the seriousness and the significance of the traffic issues for the School - which is one (if not "the") - most prestigious business affected by these proposals. The history of the School going back over 400 years is of a rural school. These proposals amount to such fundamental changes as to redefine the School as a suburban or even an urban one. The very title of the whole proposal (Eastern URBAN Extension) implies the latter. This impacts on the School's business to a major extent and that needs to be appreciated and appropriate mitigating considerations fully addressed and applied.

2. Do you have any comments on the vision within the Options Report?

The Post Hill vision should refer to the high quality landscaped setting within and around Blundell's School and should also start with the words "*Living and working in Post Hill*".

We note that the Vision is set in 2035. We understand that the Core Strategy and Site Allocations DPD runs until 2026 but we are also aware of previous iterations of the DPD map which showed a further allocation of land east of the EUE beyond 2026. We therefore seek clarification as to whether or not the Options work is considering the potential for post 2026 growth (beyond the levels and site area within the DPD) and the potential for future proofing the masterplan and more importantly the infrastructure improvements accordingly. We discuss below (answer 5) the concerns surrounding the lack of reference to a second new access which links back to this point.

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?

The development will need to take account of the high quality landscaped setting of Blundell's School and the environmental features which create the unique nature of the School campus. The development of the EUE will have major implications for the School in visual and landscape terms but there are also concerns with regards to drainage and flood risk, most notably with regards to implications for the sports pitches adjacent to the proposed EUE. This issue should be recognised within the Flood Risk and Drainage diagram on page 9. We welcome recognition within the Options Report (p7) of the important ecological features in and around the Tidcombe Fen but have major concerns with the proximity of the proposed residential development within the EUE.

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?

We are aware of aspirations from the County Council (DCC) regarding the potential provision of an Energy from Waste facility within the EUE. The extent and form of the DCC proposals are unclear at this stage and we are concerned that if such a facility is to be delivered that it will need to be fully integrated into the EUE in the most appropriate location rather than added in at a late stage on the edge of the development potentially near the School. The proposal will have significant HGV impacts and also potentially harmful visual impacts given the expected high nature of required flues and overall industrial appearance. We would also note that the land take for such a facility may consume a significant proportion of the employment land shown on the option plans without major job generation. The School is therefore keen to ensure that such a facility will not be at the expense of delivering self-containment aspirations.

The School therefore seeks clarification that the proposal will be sited as close as possible to the new junction onto the A361 to minimise the HGV movements on Blundells Road in connection with the facility. The School also seeks clarification that no delivery movements will be permitted along Blundells Road (even if coming from Tiverton). The School does however note the benefits of such a proposal in terms of assisting with the early delivery of the A361 access.

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 and environmental enhancement of Blundell's Road take place? When should highway improvements be provided?

We have already made some fundamental comments about traffic impact at section 1 above. Please take those comments into account here too.

Blundell's School is obviously keen to ensure that the highways upgrades and new access arrangements are delivered at the earliest opportunity to ensure that the impact on the School is minimised. Our previous representations have set out the concerns of the School with regards to the impact that increased traffic on Blundells Road will have in terms of pupil safety, air quality and the attractive rural character that is fundamental to the School's business. The fact that the School is a major business and employer needs full acknowledgement and appropriate consideration. Any adverse impact of the proposals has potential impact for the whole local economy.

We maintain the view that the proposed triggers within the original DPD should be implemented as evidence has not been provided in the public domain which justifies a deviation at this stage. We have not yet seen a formal report from DCC confirming the highways impacts and expected triggers for the new access points which will be required to understand the full implications of the potential masterplan options within the report. These findings are key to the process and decisions on the masterplanning options cannot be made until such evidence is provided. We are therefore concerned with the robustness of the DCC studies and the lack of information available in the public domain at this stage.

Access onto A361

The School appreciates the efforts to date with regards to the access options onto the A361 and we note the Options report (p17) considers the preferred option of the purple junction. The key to the success of the junction will be the highways layout within the EUE to and from the junction to encourage traffic to use it, in conjunction with the robust management of traffic on Blundells Road. However we seek further clarification on the expected triggers with regards to the two phases of the junction. The delivery of the southern side of the junction only will not remove those trips heading from Tiverton to the EUE so in theory any traffic leaving the EUE to head into Tiverton is likely to use Blundells Road on at least one of their journey legs. This is simply unacceptable to the School. One of the masterplan options proposes just over 1000 dwellings which appears to present a real risk that (according to initial transport evidence being provided by the landowners) may result in only the southern side being delivered.

This 1000 dwellings threshold is also quite unacceptable to the School too. It would have a huge impact on increasing traffic. There also remains a real risk that if the threshold were to be set so high, the link to the A361 might never be built. It would most certainly be many years ahead through which period the adverse impact of significantly increased traffic would have had a very serious deleterious effect for the School. Indeed this affect would have impacted on many other aspects of the locality too.

Access to Heathcoat Way

The wording of the question suggests that a second alternative access requirement onto Heathcoat Way has been dropped but there has not yet been any evidence produced to justify such decision. As noted above (answer 2) we seek clarification as to whether or not the masterplan and options report is future proofing an option for a second access if the EUE extends beyond the site boundary, or subsequently delivers the quantum of development which will trigger the requirement within the site boundary.

The School wishes to make clear that it is quite prepared to make its significant landholding along the line of the potential access available and will actively participate in any discussions around any objective of achieving that access and facility.

The School still seeks clarification as to why the Pink Route through the business park has been removed as this will still provide a major benefit in distributing traffic by removing it from Blundells Road. If there is a ransom position then the use of CPO powers should not be overlooked given the wider community benefits that such as option would deliver. The cost of compulsory purchase may well be more economical than overcoming technical constraints of other potential options and the build costs could be significantly lower given the shorter length of this option. We seek clarification as to the extent of re-examination of this option.

Paragraph 3.14 of the Options document has noted that the DPD specified that after 200 dwellings, Blundells Road would be closed to through traffic other than cycles and buses.

However we are concerned with the assumption that the provision of alternative access to Heathcoat Way is not likely to be affordable for the development at this point, and may not be necessary if technical evidence demonstrates that a higher trigger point for access onto Heathcoat Way would be acceptable. The School has not seen either viability or independent technical evidence to demonstrate that this is the case.

The School welcomes recognition (paragraph 3.14) within the Options Report that improvements would be needed to prioritise pedestrian movements and manage traffic speeds and impacts on Blundells Road. The School would welcome this albeit it would only partly mitigate then adverse impact of major traffic increases. The School has been provided with initial concepts from the landowner consortium and is reviewing the design options. We reiterate previous comments of the School that any such alterations will need to be undertaken in a sensitive manner using high quality materials and design solutions without detrimental impact to the character of the School environment. The School also wishes to ensure that the entire length of Blundells Road through the School campus (including the Preparatory School) is considered.

The School also has major concerns that DCC has not yet considered pedestrian or cycle routes (as noted within the latest landowner meeting). This will be a key infrastructure requirement to deliver a reduction in the number of vehicular trips along Blundells Road. Any potential conflict between pupils crossing and cycle movements along Blundells Road will need to be carefully managed.

Fundamentally, the School reiterates what is said above. The problems are only really addressed by the early provision of the A361 link. That is vital.

The School also wishes it to be known however, that it could regard the changes to Blundells Road to make it a cul de sac (with access for the Tiverton direction) as a good solution to the traffic issues. Then the School would welcome that outcome and do what it can to support and facilitate it.

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?

At this stage the School has no view on the extent of housing types but would envisage that the site will deliver a lower density style of development due to the local market. This will assist with reducing trip generation but could have implications for infrastructure delivery.

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

We note the concept proposes the employment floorspace in a single location north of Blundells Road running adjacent to the School playing fields. The School has concerns with the potential impacts of industrial / energy centre uses on the landscape setting of the School in this location and will therefore seek the provision of an enhanced future landscape buffer or more appropriate mix of uses in this location.

The key implications of the employment floorspace level will be the split of proposed B class uses as this will have major implications for job generation figures and therefore traffic movements. As noted above the School is keen to ensure that the development provides a level of self-containment and does not result in a residential development with attached B8 use class distribution hub generating low levels of jobs, significant HGV trip generation and high levels of out commuting by residents.

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

The School wishes to point out that the existing School playing fields are for use of the School only and cannot be considered as contributing towards existing infrastructure within the local area. These pitches are a crucial element of the School's business and attractiveness to its pupils, parents and future generations of both.

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

We reiterate earlier comments that the local centre should not be a destination in its own right which would encourage additional traffic movements. The level of retail provision should therefore be commensurate with the scale of the development for local needs only.

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

At this stage the School does not have a particular preference however they would support Option 1 on the basis of the lower growth figures. The Option 2 local centre may however assist with reducing traffic speeds on Blundells Road if it is to straddle both sides of the road. We reserve the opportunity to consider the options further with an informed evidence base with particular regard to highways impacts and infrastructure phasing.

11. Overall, do you agree with the proposed scope and content of the proposed masterplan document as shown on page 24 of the Options Report?

We seek clarification that the scope includes phasing of the development and relationship with infrastructure delivery. Successful integration of the development with existing land uses should also be a key consideration. As noted above the document should also consider future proofing and the potential risk of additional development beyond the EUE boundary.

It is the phasing and timing of the provision of essential infrastructure which holds the key to the acceptability of the whole EUE. Here, the A361 link is the most crucial element. We believe that we have made that abundantly clear above.

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

Page 11 Summary of Constraints and Developable Area needs to recognise the constraint of the School and the rural high quality setting of the campus. Hitherto it does not appear to have done that adequately.

13. Are you a) A statutory consultee (e.g. Town/Parish Council, Environment Agency) b) A community or special interest group (e.g. Civic Society, Campaign to Protect Rural England) c) A member of the public

The School wishes to be considered as a statutory consultee on the basis of the potential impacts.

Summary

The School welcomes the opportunity to provide these comments and will continue to take an interest in the masterplanning exercise for the urban extension. We look forward to receiving notification of future consultation exercises.

Yours sincerely

Pete Stockall MRTPI Associate - Planning, Development and Regeneration

For and on Behalf of GVA Grimley Ltd

cc. Blundell's School

