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WEST MANLEY LANE CONSERVATION GROUP (WMLCG)

Tiverton Eastern Urban Extension (TEUE) Masterplanning: Options Report

Response: May 2013

It is clear from the evidence presented at the various exhibitions and published in the **Options Report (OR) (MDDC May 2013)** that, at this stage, a significant number of the plans proposed lack clarity and timing, contain errors and omissions or are currently deficient in a wide range of data.

Thus, our response can only be presented on the basis of limited detail. It is essential that all relevant information is available before the next phase of the public consultation, scheduled for August/September 2013, in order that WMLCG can make a meaningful contribution to the MDDC's future development plans.

That said, WMLCG is pleased to respond, following the sections and questions laid out in the **OR** both in general terms and, where relevant, by specific argument with regard to our stated desire to protect and enhance the area of West Manley Lane; we are informed that this is within "Area Three" of the proposed development plan (*pers comm T Baker Waddeton Park Ltd*).

1. Do you feel that the balance between employment and housing development is appropriate?

Whilst accepting that Tiverton is caught up with the debatable national drive for building, we are encouraged by MDDC's reduction in the apparent needs of both local housing quotas and employment floorspace. The argument remains unresolved as to whether the *local* needs of the town justify the long term alteration of its social environment; much is being asked of both present and future residents to accommodate outside requirements. Political uncertainty and financial constraint may yet influence final targets but "local houses and local employment for local people" remains the key.

The balance between housing need and employment opportunity outlined in TEUE's proposal can only be "appropriate" if the work available meets the requirements and specificity of the residents seeking work. There is little point in creating jobs simply to attract outsiders or if these posts do not apply to the local work force. National and local statistics confirm that it is only the over-65 age group that will show a significant rise in population over the next 20 years which suggests that the current employment floorspace target is an overprovision. Perhaps if the Junction 27 discussion was finally addressed then it could accommodate the appropriate scale and type of employment being sought by MDDC.

If not, then in the opinion of WMLCG, the balance is not “appropriate”.

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

Although the concept of guessing what the long-term effects of development will be on Post Hill would seem to be just an enthusiastic fantasy, its author’s glimpse of Utopia must be suitably offset:

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.

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

a) Tidcombe Fen SSSI. It is assumed that features covered by AL/TIV/3 will not be encroached upon nor damaged by any proposed development. However the proximity of such housing to both the catchment area and riverine path of Ailsa Brook flowing into Tidcombe Fen SSSI puts at risk the integrity of the water quality and the protection of current fauna and flora.

b) West Manley Lane. The ancient hedgerow and associated historical, archaeological and communal value of this unspoilt Devon lane provides both a pleasant and healthy link to both the Grand Western Canal and Railway Walk for a wide range of human activity as well as preserving an essential wildlife corridor.

c) Vistas from Railway Walk and Grand Western Canal. Although both of these pathways are within AL/TIV/3 Green Infrastructure, the northern views from both for Tivertonians and tourists alike should be “protected and enhanced” either by sympathetic design, development and planting or by resisting the temptation to build within line of sight.

d) Trees and hedges. Within the entire TEUE area, there are many individual or stands of indigenous trees from ‘semi-mature’ to ‘ancient’ category. There is little or no written evidence of either an arboreal impact assessment or any apparent attempt to consider applying for Tree Preservation Orders, where appropriate and ahead of any such development. Better to preserve what is there than to wait twenty five years for a sapling to develop.

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?

With regard to the proposed **Waste Recycling Facility (WRF)** WMLCG understands that the actual type will not be specified at this stage as technology will change over the next “fifteen years” (*George Marshall pers comm*), although currently some such facilities are in excess of two stories high and require chimney stacks in excess of 70 metres (*Defra 2012*). In addition, WMLCG is assured that it is for the appropriate industry to specify the type of facility through private finance, not Devon County Council who is proposing this scheme.

Rather like other aspects of this document, it is difficult to make a meaningful judgement on a proposed industrial development whose position is not drawn, whose

footprint unknown and whose impact cannot be predicted. Clearly, in addition to matters of landscape, quality of life, pollution and economy, *The Devon Waste Plan* acknowledges (**Site Appraisal Report (SAR) Para 2**) a list of likely nuisances and admits (**SAR Para 45**) that “tranquillity to the east could be disrupted to a degree by waste development here”. Transport and access as referred to in DCC’s **Site Identification & Methodology (SID&M) appendix 4 p42** (20 to 50 vehicular movements per day) can only realistically be undertaken on a purpose built road, leaving the A361 as the only viable choice serving a site placed somewhere along its length towards Junction 27 (J27) with all the appropriate caveats. **SAR Para 5** makes mention of use of J27 as an alternative; since its re-introduction for consideration by MDDC’s **Economic Development Strategy, 2011** it is believed that this is still a viable proposition and an obvious site for a WRF. Until more is known about the future, safety, acceptability and performance of an “energy centre” with or without a “district heating scheme”, no decision can be reliably made.

5. The development will increase traffic. How should this be dealt with and where should the new highway junction to the A361 be located? How should traffic calming and environmental enhancement of Blundells Road take place? Where should highway improvements be provided?

Taking the lowest predicted housing development (1200) and the lowest projected “cars per household” ratio of 1.5, if the plan is to develop employment within the newly created “suburb” of Post Hill and provide it with shopping, community and schooling facilities, how much *more* traffic would be needing daily access in and out of Tiverton? Are these projected figures available for consideration?

Calming traffic along Blundells Road (BR) is simply a matter of creating road-narrowing barriers and obstructions such as central traffic islands planted with trees which would double as “environmental enhancement” and “traffic calming” measures. Modern designs of speed humps (as increasingly built in many London boroughs) and an across-town speed limit of 20mph would add to safety and economy. However, it should be noted that several hundred children from Blundell’s School cross and walk alongside this road regularly during term time. The narrowness of BR from Tidcombe to Horsdon Roundabout is such that heavy goods vehicles need to drive very close to the pavement, damaging road-side structures.

Clearly there needs to be a new junction onto the A361 at an early stage. However, the ever-changing complexities of the costing, civil engineering, political manoeuvring and effect on both present and future residents set against the lack of clarity and variation in alternative routes and the unhelpful pronouncements of the Highways Authority of DCC

regarding housing numbers versus needs for road development (OR 3.8), make an informed pronouncement difficult at this stage. Those responsible should be charged with drawing up a comprehensive set of plans before the next public consultation.

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

The type of housing we would like to see is that which is appropriate to perceived needs and their proximity to the required services!

Cognisance must be taken of the predictions for growth in the 65 plus age group; both Office of National Statistics and MDDC's 2009 Infrastructure Plan – Table 3 show that there will be an increase of between 50% and 60% over the next twenty years. Suitably sited and designed dwellings must take this into consideration; bungalows are popular within this age group, but not so amongst builders and developers.

That said we are in broad agreement with the statements regarding residential development as set out in OR 3.15:5, 3.16 & 3.17.

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

Given the earlier remarks regarding the perceived overprovision of floor space, then the inclusion of development land set out in both Options One and Two offers a suitable and well- sited mix of employment alternatives as defined in Town and Country Planning Use Classes Order 1987 under B1. A1 (shops) A2 (Finance and other) A3 (restaurant) and C1 (hotel), all providers of suitable employment and facilities, should be considered for inclusion here or, as outlined below, in the "local centre", and referred to in OR:3.20.

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

The ability to answer this section is seriously hampered by the lack of published information on an environmental impact survey, landscape and visual impact survey, arboreal impact survey and complete ecological records (outside of a small segment of Area 1 in the North East corner). In particular, the Green Infrastructure Plan remains unpublished.

Both Options encouragingly introduce the concept of environmental connectivity with the buzz words “greenway and corridors”, “strategic green networks”, “connective greenways”, “green corridor” without defining what is meant and how they are to be outlined, constructed, developed and protected. Tree preservation Orders should be considered (as above 3d)

These corridors should be generously planted with indigenous trees, shrubs and wild flowers. RSPB recommend 60 bird boxes per 100 new dwelling units. Devon Wildlife Trust suggests “habitat formation, creation and connectivity”. There is no need to create an artificial green space if one already exists and is preserved and enhanced. Where possible, within the constraints of the development, natural habitats should be conserved existing ones, not newly constructed sites, unless the introduction of a new habitat is in mitigation of one lost.

There are no suggested areas of standing water or reed-beds; these could be incorporated into any necessary SUDS and be a useful addition to the habitat mix.

The “Public open space/Multifunctional Strategic Parkland” suggests all manner of imposed activity detrimental to the existing landscape, flora and fauna. That being so, some of this parkland should be set aside for managed wildlife habitat (ideally bordering the Ailsa Brook and adjacent stands of trees and hedges.

The northern boundary of AL/TIV/3, the Railway Walk, could become a linear fitness trail along its length from Horsdon to Manley Bridge, in addition to its role as a walk/cycle path. Public Health has become the responsibility of the local authority, charged with finding new ways of keeping us fit and well. Here is such a contribution, which can be funded by private industry (*pers comm*) or MDDC or the developers.

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 area?

In keeping with the stated aims of the project, placing the local centre just south of BR, as outlined in both options, seems sensible and appropriate. Exactly what types of community facilities and other services are located there would depend on the overall space allocated. In addition to those already listed in OR 3.15 -3.20, provision of a General Practice surgery should be considered.

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

This suggests an either/or situation; rather, we would like to see MDDC, after taking cognisance of *all* the input from the consultations, decide on what is the best mix for the future of Tiverton and instruct the developers to come up with the required plan.

That said, of the two options available, WMLCG would prefer **Option Two**, with suitable modifications:

- i. Residential development south of West Manley Lane jeopardises the integrity of Tidcombe Fen and does not take into account the question of surface flooding at that point.
- ii. The employment area planned south of BR seems inappropriate set amongst the residential development.
- iii. Clarification needed as to how “greenways” & “connective corridors” are to be constructed or outlined.
- iv. The primary boulevard appears to follow the steep contour south of BR.
- v. The “orchard” at 7 (**OR p 22**) does not exist.
- vi. There is a lack of detail and a significant deficiency in data.

Regarding Option One:

- I. Development at 14 & 8 (**OR p 18**) similarly jeopardise the integrity of Tidcombe Fen catchment area and Ailsa Brook water quality.
- II. School playing fields appear to be built into the 1:10 slope south of BR.
- III. The school area is bisected by the primary route.
- IV. There insufficient detail regarding 9,13 &15 (**OR p18**)

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

As a skeletal “to do” list it is adequate but offers little of what each section will convey. Much detail and data has yet to be garnered and published and must be available before the draft Masterplan is discussed at MDDC Cabinet level, let alone the next public consultation.

Mapping detail is too small and often inexact to be of value: larger, clearer illustrations are essential in the new document.

There are no specific references to costs involved both initially and on-going and from where and from whom these tranches are coming, no indication of timing and integration of the various phases of development or how the stated aims of the development will be achieved and monitored long term. Such information must be included in the draft Masterplan document.

Identification of the organisations responsible for the plans and development should be included in Section1-Introduction.

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

Future public consultations should be better prepared with adequate space set aside in appropriate locations attended by suitable numbers of planners, developers and council officers, clearly identified, to enable members of the public time and room to view and discuss the plans.

All studies and surveys, as listed on **OR p3**, must include *all* the areas within the plan and be completed in adequate time before the next public consultation. Their publication should be notified to all registered interested parties.

From the timetable it is noted that the public will have no further sight of, nor say in, the Masterplan after its consultation in August/September, whatever changes may have been made thereafter.

WMLCG continues to propose that the area of land extending to 11.43 hectares to the south of West Manley Lane should not be developed and should be included as part of the Green Infrastructure Protection.

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

For the last 5 years, this conservation group has replied to the various MDDC enquiries such as AIDPD, Green Infrastructure Strategy, Local Plan 3, Heritage Register and Economic Development Strategy with documentation and statistical analysis, including a commissioned independent Hedgerow Assessments, consistently arguing our concerns over wildlife and SSSI protection. We feel that now is the time MDDC took note of our recommendations and instruct the developers of both Options to incorporate the land south of West Manley Lane into the AL/TIV/3.

13. We are a special interest group.

14. All members of the group are “members of the public” and live within the boundary of the allocated site at Post Hill.

WMLCG looks forward to reading the draft Masterplan and being further involved in the Council’s evolving planning strategy.

Dr R W Whittlesey,

For and on behalf of **West Manley Lane Conservation Group**

28 May 2013

