

**Sandra Hutchings**

**From:** Douglas Morrison  
**Sent:** 01 February 2014 18:19  
**To:** DPD  
**Subject:** Response to Local Plan Review Options Consultation : Objection to Tiverton Option TIV13 - Exeter Hill  
**Attachments:** TIV13 Extents from Knightshayes.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed



Dear Sir / Madam,

Further to your invitation for responses to the Local Plan Review, please find below an objection to Tiverton Option TIV13, Exeter Hill, hereafter referred to as "the site".

#### **'Inconsistencies in Published Documents**

Prior to setting out concerns that we have about the proposed site, we would like to highlight an inconsistency between your Interim Sustainability Appraisal Document (ISAD) and the Options Consultation Document (OCD) both published in January 2014 as part of the review process. Appendix 2 of the ISAD has assessed the sustainability of the site for the provision of just 20 houses, whereas the OCD states that 55 houses will be built. We would suggest that either the data presented in the ISAD appendix is invalid and the assessment needs to be redone with the correct number of dwellings, or the OCD needs to be corrected with a view to limiting the developer to just 20 properties should their development be included in the final Local Plan. For the purposes of our objection we assume that you are proposing 55 dwellings on the site.

#### **Mid Devon Allocations and Infrastructure Development Plan (MDAIDP) and Visual Impact**

Given that this site has been considered previously in the MDAIDP as a Non-Allocated Site, and discredited by the Inspectors appointed by the Secretary of State for Communities and Local Government in their report of August 2010 citing "visual impact in views from within Tiverton and beyond, including from Knightshayes Historic Park and Garden to the north west" as reasons for there being "no need for its inclusion", the appearance of this location as an allocated site in the Review Options document is baffling as there can clearly have been no change to the visual impact that the site will inflict upon Tiverton and the surrounding area.

Indeed, its inclusion seems somewhat at direct odds with Tiverton Policy S11 as set out in the Options Consultation Document dated January 2014 which states that the council will "guide high quality development and other investment to retain the green setting provided by the steep open hillsides, particularly to the west and south of the town".

We attach a prediction from Google Earth Pro which indicates the extents of the site as seen against the skyline of the hills to the south of Tiverton when viewed from Knightshayes. This simple assessment demonstrates that the site will cause a significant visual change to the horizon for many miles around to the detriment of the green open hillsides.

#### **Omission from Local Plan Review Scoping Report and Cost of Development**

Given that this site was omitted from the Local Plan Review Scoping report published in July 2013, this site is clearly not a preferred site from the perspective of the Mid Devon Council. If this site is being pushed by developers and landowners, then careful consideration must be given to the economic viability of this site. If the developer is to implement all of the Local Plan Review requirements, including Sustainable Urban Drainage on a difficult slope, 33% affordable housing and dual access, the cost of developing the site may be far more than can possibly be recouped from the sale of the properties, mainly as a result of the complex nature of the site topography and access. Surely if the council needs to meet a housebuilding requirement, it would be better for the council to identify and support a far less risky development that is more likely to meet its needs than support one which may fail on economic grounds after many years of hard work developing the Local Plan.

## Sustainability

By your own assessment, this site contributes negatively towards achieving your sustainability objectives, even when assessed with just 20 houses are placed upon the site. If you add up all of the various assessments of impact on your sustainability objectives as detailed on Page 60 of Appendix 2 to the ISAD, the site currently stands at a rating of '-3' which, by your own definition means that "The policy/proposal will have a significant negative contribution towards achieving the objective". Of all of the Tiverton Site Options, this site is the most negative in terms of sustainability.

## Access

We note from the OCD that access to the site from Exeter Hill has been discounted due to the "substandard nature of the junction of Exeter Hill and Canal Hill", which we believe to be quite correct and fully support. It therefore follows, however, that access for the 55 new properties must be from Devonshire Rise.

The 45m long access from the T-Junction near to No 41 Devonshire Rise to the existing gate into the site was built with just the 7-8 properties on the Devonshire Rise Cul-De-Sac in mind. As such, the developer was able to build an R33 Type Shared Service Access Way\* to these properties (\* as defined by the Devon County Council Publication - Highways in Residential and Commercial Estates Design Guide).

This has meant that the existing dwellings along this access have been built much closer together than in the rest of the Devonshire Rise estate and we do not believe that it will be possible to widen the access to a full R2 Access Road as required by the design guide to serve the 55 new properties. There would need to be a full 9.5m of land owned by Devonshire Homes (or the Highways Authority if the road has been adopted) to create this road and this does not currently exist making the creation of a compliant access impossible.

We also note that the OCD requires that the site requires the "provision of a suitable secondary point of access." If this access cannot be provided from Exeter Hill, then the only other option is for the site to be provided with a new access along the existing concrete access track to the north of the site past No.36 Canal Hill. Again this access is limited in width by existing dwellings and it currently measures just 3.5m wide at its narrowest point. It will not be possible to provide the required second R2 Type access along this route to make the access to the site compliant with Highway Standards.

## Site Slope.

The OCD has acknowledged that the entire site would be built upon a steep slope and the housing density has been reduced to about 15 dwellings per ha as a result. Even so, there is little scope for negating the need for steep access roads within the site. These will be at gradients of up to 20%. Given that Devon Highways asks to be consulted for roads in excess of just 10% gradient at the planning stage, 20% gradient roads are exceptionally unusual for new housing developments and would require the site to be carefully considered, probably at significant cost. It is also worth noting the troubles that properties further up Canal Hill on Anstey Crescent and Sidling Fields have on the steep slopes to the south of Tiverton when ice forms. A further development on such steep slopes can hardly be justified.

In summary this development has been tabled and rejected on a number of grounds before. It is clear that the site has not improved or changed in any way since the last time it was proposed and as such, it should be rejected again.

Yours faithfully,

Douglas and Morwenna Morrison  
Swallowfield  
Exeter Hill  
Tiverton  
Devon  
EX16 4PL

## View of Boundary of TIV13

As assessed from field in front of Knights Hayes House  
50.9229237N, 3.4827888W

### Legend

 TIV13 Planning Application Boundary

Google earth

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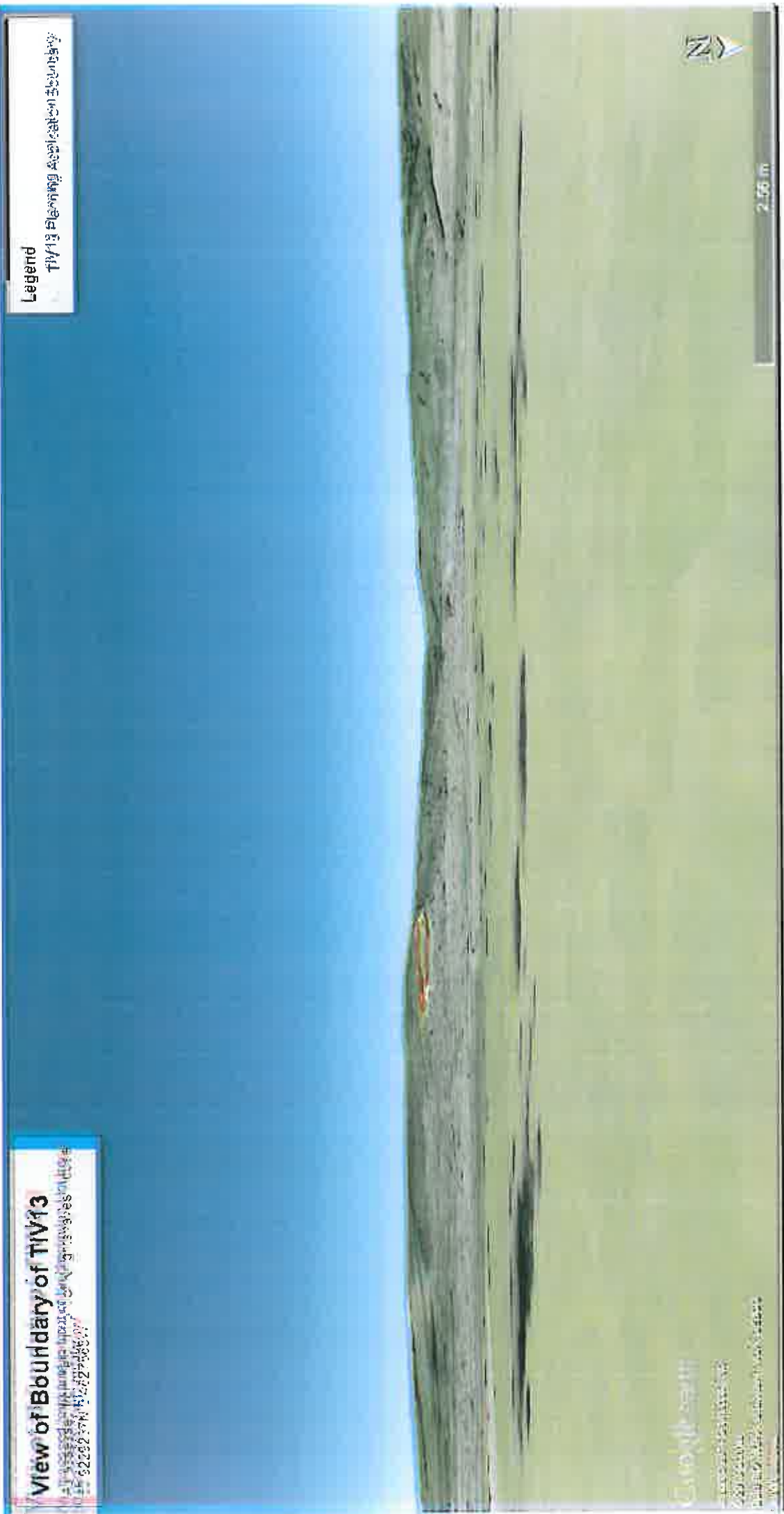
2.56 m

# View of Boundary of TIV13

6228237N 15282748E  
6228237N 15282748E  
6228237N 15282748E

## Legend

TIV13 Planning Application Boundary



Google Earth  
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20130614  
Data courtesy of GeoEye, IGN, GeoEye and Mapbox  
TIV13

2.56 m

