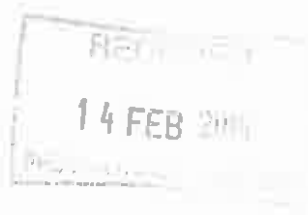


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From: Mr DJA Stone FCMI MIOd MSoA

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Local Plan Review
Forward Planning
Mid Devon District Council
Phoenix House
TIVERTON
Devon EX16 6PP

10 February 2014

Dear Sir,

LOCAL PLAN REVIEW OPTIONS: SECOND STAGE CONSULTATION

INTRODUCTION

1. I attended the local plan second stage public consultation display at Tiverton on 1 February. As a result, I now wish to record my concerns and preferred option(s) for any new urban development that might follow on from or (in one case) further extend the existing Tiverton Eastern Urban Extension (TEUE) development that is currently under consideration by MDDC. Any consideration of these three planning development options cannot be carried out in isolation from aspects of the TEUE development, BUT especially so in respect of the Hartnoll Farm site.

THE TIVERTON EASTERN URBAN EXTENSION (TEUE) PERSPECTIVE

2. I remain unconvinced that there is any need for an urban development on the scale currently proposed for the TEUE between Tiverton and Halberton. The projected housing requirement portrayed by MDDC in its forward plan when it was mooted some five years ago was flawed in several key areas, as well as reflecting what was the then central government's ideological and perverse 'one size fits all' political agenda and centralized policy for its planning strategy. Accordingly, having now followed the subsequent proposals, publications and consultations relating to the TEUE over the past eighteen months, I remain unconvinced that this situation has changed in any way. Despite a welcome reduction in the total number of houses currently shown in the TEUE second public consultation plan to about 1,500, I believe that any proposed requirement for more than a maximum of several hundred new houses is quite unsustainable. It follows that any proposal to – in practice – subsequently add several hundred more houses on to the eastern end of the TEUE at Hartnoll Farm is even less sustainable, while simultaneously undermining the credibility of any further reductions by MDDC of its TEUE house quotas consequent upon its public consultations on that forward plan.

2. I continue to accept that some level of local development is unavoidable in order to meet government mandated policy objectives. However, in my submission the TEUE urban development proposed is on a scale that cannot be justified as a response to any sort of local house building requirement or local levels of homelessness. It follows that I wish to record at the outset, in the strongest possible terms, my objections to any development proposal that would *de facto* allow the TEUE (irrespective of the eventual scale of that development) to encroach on to farmland even further to the east of Tiverton at Hartnoll Farm, and ever closer to the western boundary of the village of Halberton.

OPTION ONE – HARTNOLL FARM

GENERAL

3. Many of my concerns about the TEUE (which were set out in some detail in my letter dated 16 January 2014) apply equally or (in the case of traffic and road safety issues) to an even greater extent if several hundred additional houses were to be built on the Hartnoll Farm site. If (for example) 300 houses were to be built there, this could represent a further population increase of almost 1,000 people of all ages, with up to 450 motor vehicles. It would be disingenuous to suggest that the already over-stretched local facilities and services (police, fire, secondary education, NHS hospital and social services, GP practices, dental practices, foreign-language translators, waste collection and disposal facilities, transport and utilities) would automatically expand beyond even that that envisaged in the TEUE plan, in order to accommodate yet another large influx of people of all ages, origins and socio-economic circumstances. At the same time, those services currently provided to the existing residential community would yet again be degraded to varying degrees.

4. Adoption of the Hartnoll Farm site would no doubt place a potentially unsustainable additional load upon existing local utilities, drainage, sewerage etc. beyond the immediate area of Hartnoll Farm. In addition to those facilities laid within the site, numbers of existing pipes, cables, electricity substations, telephone facilities and other associated infrastructure well beyond the site would need upgrading to support the development, which would in turn impose massive disruption upon the area east of Tiverton for many years, including Halberton and beyond. Irrespective of purely objective considerations of practicality, cost and political imperatives, it would be irresponsible, insensitive and perverse of MDDC to inflict yet more years of additional disruption, trauma, stress and traffic chaos upon the population of Halberton and Sampford Peverell far beyond the initial period of construction and eventual implementation of the current TEUE urban development. The gross unfairness of any approval of the Hartnoll Farm option indicates that it should be rejected at the first opportunity, and a guarantee given to Halberton Parish Council that no further urban creep eastwards from Post Hill towards Halberton would be entertained by MDDC forward planning for at least 25-30 years after completion of the TEUE.

HALBERTON VILLAGE – THE ROAD TRAFFIC ISSUE

5. The road traffic situation in Halberton village, on Halberton High Street and on adjacent access roads is already dire, and this subject was addressed in detail in my letter dated 16 January. While the TEUE development will undoubtedly exacerbate this situation in any case (the intended new access to the A361 from the TEUE is unlikely to alleviate Halberton's traffic problem at all), any additional development even further to the east of the

TEUE would increase yet again the adverse impact of an inadequate road system that is already unable to deal adequately or safely with the volume and diverse types of vehicles transiting Halberton travelling to/from Tiverton, Willand and the M5 Junction 27.

6. In practical terms, there is almost certainly little or no scope for widening the existing roadway or for re-routing transit traffic around Halberton well to the south of the village. At the same time, the current passage of transiting vehicles (notably HGVs and other commercial vehicles) is destroying the road surface and creating ever more potholes, precipitating consequent road repair costs for the local authorities and also making those authorities potentially liable to claims for damage, injury or (in the case of cyclists) death. This traffic is also polluting the environment through exhaust emissions and vehicle noise, to the detriment of the day-to-day quality of life and health of Halberton residents, as well as potentially causing structural damage to the many houses that abut directly on to the High Street. This issue represents a practical obstacle of such importance that it should surely baulk any urban development of the Hartnoll Farm site.

7. I was concerned when officials confirmed yet again that no measures to resolve the traffic problem in Halberton are under consideration within the TEUE and associated development planning in anticipation of the construction and occupation of the TEUE, and by their acknowledgement that in any case nothing could realistically be done about this issue. I noted their hope that the new A361 access might alleviate this problem, although I believe this to be a vain hope. But even more disturbing was the suggestion that – as the Halberton traffic bottle-neck road safety situation worsens during the construction and implementation of the TEUE – drivers of all types of vehicle travelling via, to and from the TEUE area (and Hartnoll Farm site) might in practice be discouraged from passing through Halberton in order to avoid an ever-worsening traffic situation within the village – thereby reducing the volume of traffic on that road. However, while certainly pragmatic, this hardly represents a reasonable or acceptable solution of this particular key issue.

HALBERTON VILLAGE – IDENTITY AND THE WIDER PERSPECTIVE

8. The impact of the urbanization of Hartnoll Farm upon both Tiverton and Halberton would be profound. This *de facto* extension of the TEUE beyond Post Hill would open the way for an eventual urbanization of all the land between Tiverton and Halberton and beyond. By default, Halberton would over time lose its unique identity as a Devon village and submerge into one of Tiverton's ever-expanding housing estates. Any wider adverse effects of the TEUE upon the character of Tiverton as a rural market town and tourist destination would be magnified enormously for Halberton by the imposition of yet another – even more inappropriate – urban development, this time spanning the whole area of farmland bounded by Post Hill in the west, and Crown Hill and the Grand Western Canal to the east and south.

TOURISM, LOCAL ENVIRONMENT AND WILDLIFE

9. Tiverton, as does much of Devon, depends directly or indirectly upon tourism as a primary source of revenue and employment. The physical impact of the urbanization of Hartnoll Farm, and all that would be associated with it, upon the presentation and aesthetic appearance of the eastern gateway to Tiverton as soon as the Grand Western Canal bridge is crossed would be potentially extremely harmful and certainly irreversible.

10. The future disinclination of potential tourists to visit a town dominated by its surrounding sprawling housing-estates – rather than the historic and traditional Devonshire market town and rural area that Tiverton and its nearby villages can still claim to be – would impact adversely upon a wide range of tourist accommodation, coffee shops and restaurants, historical and leisure attractions and hospitality services within Tiverton. This *de facto* add-on to the TEUE would further exacerbate the potentially adverse impact of that larger-scale plan, which could place at risk the existing jobs of people employed locally in the town's tourist and hospitality industry.

11. Any urbanization of Hartnoll Farm would directly affect Tiverton's single most important tourist asset: the Grand Western Canal. Wildlife (especially bird life), leisure activities, individual and community health and fitness, the Minnows Caravan Park (at Sampford Peverell) and the Tiverton Canal Company could all suffer varying degrees and types of consequential damage or financial loss. Meanwhile, assuming that pet ownership by prospective residents of a new development on the Hartnoll site would over time number (say) a couple of hundred cats and dogs, this would inevitably – in the case of dogs – adversely affect the day-to-day cleanliness of the canal tow-path between Halberton and the canal basin, while cats would pose a significant threat to all bird life along the canal and across the rural areas within and adjacent to the intended development.

PERMANENT LOSS OF PRIME AGRICULTURAL LAND

12. Urban development of the Hartnoll Farm site would involve the permanent loss of a large tract of prime agricultural land to housing. However, this is land that can and should still be used for food production and other agricultural purposes in the years ahead (or even for a major green energy project such as solar panels, which – unlike housing – could be temporary and would be infinitely preferable to further urbanization and the consequential growth of the local population). To deny at this stage the likelihood of this greenfield site within an essentially rural area being needed for food production or other agricultural or appropriate renewable energy applications in the future would be both naïve and short-sighted.

FLOOD PREVENTION

13. The recent flooding across much of the south and south-west of England serves to underline the potential recklessness and perils of concreting over large tracts of greenfield land which have a key role in absorbing rainfall and surface run-off from buildings, hills and overflowing waterways. It is noteworthy that the recent period of persistent rainfall caused flooding immediately adjacent to the road running past the Hartnoll Farm site. No doubt such flooding would be much more extensive and potentially damaging if this rainfall and water run-off were not able to be absorbed by the existing farmland on that site. Accordingly, it would be extremely naïve to believe that the loss of this large area of water-absorbing grassland would not have significant consequences for Halberton in future years: not only on the adjacent roads but especially within Halberton Lower Town, and on the existing flood plain by the mill stream and adjacent village properties. Recent flooding events across the UK, especially the current crises in the south-west and southern England, should in any case give serious pause for thought at every level of government before any more major building on greenfield sites is authorized or carried out. There is every indication that the incidence of extreme weather events and extensive flooding will recur and increase year-on-year in the future.

OPTION TWO: WILLAND AND JUNCTION 27

14. The advantages of Option Two over Option One are significant, due primarily to the pre-existence of easy access to the M5 Junction 27 and Tiverton Parkway railway station. A development at Junction 27 would almost certainly have been a much better solution than the TEUE, although it is understood that the previous government's secretary of state somewhat misguidedly rejected that option some four or five years ago as being unsustainable. However, given the intended mix of commercial development close to Junction 27 and housing between that area and Willand, with all this development to the south of the M5, this option has attractions. Not the least of these would be that residents who worked in Taunton, Exeter, Cullompton or North Devon would have no need to travel via Sampford Peverell, Halberton or Tiverton in order reach the M5, Tiverton Parkway station or the A361 North Devon Link Road. However, there would be a possible risk of residents working in Tiverton using the Halberton-Willand 'rat-run' road, with a commensurate increase in traffic volume. My earlier observations about traffic through Halberton would again apply, albeit at a much lower impact level.

15. However, the sheer scale of the commercial and leisure element of this option would undoubtedly have a significant and possibly adverse impacts upon both Halberton and Sampford Peverell. Accordingly, while the provision of dormitory housing for Exeter and Taunton adjacent to M5 Junction 27 has some merit, the size and nature of the proposed commercial area may well be inappropriate and therefore requires further study. Nevertheless, I believe that the Willand-Junction 27 option would certainly be a better solution than Option One.

OPTION THREE: CULLOMPTON

16. While Option Two exhibited significant advantages over Option One, I believe that the development of what is in effect a new community, complete with the necessary infrastructure and commercial support on a scale that is apparently even larger and more comprehensive than the TEUE development proposal, presents the best of these three alternative development options. In many respects, this option reflects aspects of the generally sensible 'new town' concept of former times, but which was generally abandoned in favour of much less cohesive – but simpler and less costly – planning policies for piecemeal urban development.

17. I am aware that Cullompton Town Council favours this development proposal, and that a lack of success in regenerating and reinvigorating Cullompton – compared with Tiverton and Crediton – has been very evident in recent years. However, this proposal could move that town's longer-term development plans well beyond the piecemeal construction of modern housing estates that has tended to characterize its growth in recent times, and set it on a course that could include commercial regeneration, employment opportunities, tourism and increased leisure activities and facilities. This development would also underline the need to complete the much-needed enhancement of the M5 Junction 28 access. In due course, it might even enable Cullompton to realize its aspiration to re-open the town's mainline station. Nevertheless, there would still be a risk of residents working in Tiverton using the Halberton-Willand 'rat-run' road, with a commensurate increase in traffic volume, albeit this would be much reduced from the amount of traffic resulting from either Option One or Option Two.

18. It follows, therefore, that Option Three offers significant advantages over Options One and Two.

CONCLUSIONS

19. The urbanization of the Hartnoll Farm site (Option One) has no obvious advantages and would attract several major disadvantages – including the further exacerbation of what is apparently an unsolvable traffic problem at Halberton – and would also significantly aggravate and prolong the adverse impacts of the TEUE development that is already under consideration and likely to be implemented in due course. It is anticipated that existing communities at and further to the east of Tiverton are in any case about to suffer decades of growing stress, environmental pollution and general turmoil due to the TEUE; therefore, as a matter of policy, any further urban development of Tiverton town should be directed elsewhere. Accordingly, the Hartnoll Farm option should be rejected by MDDC at the earliest opportunity (paragraphs 3-13).
20. The development of a commercial site adjacent to M5 Junction 27 linked to a residential development at Willand (Option Two) has several important advantages, notably its ready access to major road and rail communications and an ability to provide employment opportunities on a meaningful scale. Therefore, this option could be acceptable, subject to further study of the impacts of the scale and nature of the commercial element (paragraphs 14-15).
21. The much more far-sighted development proposal for the area to the east of Cullompton (Option Three) is apparently favoured by that town's council and has several practical advantages, including direct access to the M5 at Junction 28. However, its greatest potential advantage is the 'once in a generation' opportunity that it would confer upon Cullompton to regenerate the town, with the opportunity to put in place a sizeable and potentially vibrant new community, complete with supporting infrastructure developed as a comprehensive and cohesive entity rather than as yet another piecemeal add-on to an existing urban area (paragraphs 16-18).

RECOMMENDATIONS

22. I recommend the absolute rejection by MDDC of the proposal to develop the Hartnoll Farm site (Option One).
23. I recommend the adoption by MDDC of either the site at M5 Junction 27 and Willand (Option Two) or that at Cullompton (Option Three).
24. However, of these last two options, I strongly recommend adoption by the MDDC of the proposed urban development site to the east of Cullompton (Option Three).

Yours sincerely,

