

**Dr C. Bell**  
**18, Uplowman Road**  
**Tiverton**  
**Devon, EX16 4LU**

Mr Hare-Scott  
Mid Devon District Council  
Phoenix House  
Phoenix Lane  
Tiverton  
Devon EX16 6PP

17th March 2014

Dear Mr Hare-Scott  
**Re: Local Plans**

The Department for Communities and Local Government are clear that ‘housing to meet the needs of an area must be based on sound evidence’ and that Government ‘wants to see sustainable development, **not development at any cost**’. Re-generated empty homes, and ‘brownfield’ sites as well as underused offices should all be used for housing stock long before good agricultural land is built over.

Tiverton’s internally generated population increase demands are not sufficient to warrant the construction of the 1000-1500 houses planned for the EUE and therefore, certainly not for the EUE area **plus** an additional 1000 or more houses on the land at Hartnoll Farm.

Certainly, if you allow houses to be built, people will arrive to occupy them but they will not be the local people that MDDC claims, nor will they enjoy local employment and travel by bus, on bicycles or on foot as also imagined by MDDC.

It is plain common-sense to regularly review and revise, as necessary, your evidence for such a large new housing and commercial property development in a confined area. It must be the County and local Councils’ responsibility, in their constituents’ interests, to very carefully re-consider the necessity for, and justify, such a massive development on greenfield land given the very real economic, population and National policy changes that have occurred in recent years and will clearly continue for some years to come.

MDDC’s ‘Consultation Statement’ issued with the minimally revised masterplanning document re-iterates the standard response to all our requests for a review of the need for such a large new development i.e. ‘The need for the level of development planned for, its location and the allocation of this site were extensively tested via the examination in public by a Planning Inspector preceding the adoption of both the Core Strategy and Allocations and Infrastructure Development Plan Document. They are therefore adopted and are not able to be reopened within this document’.

According to *The Planning Inspectorate* ‘Unless Mid Devon Local Authority invites representations on the adopted Core Strategy and Allocations & Infrastructure Development Plans there is no requirement to review new representations’ (Pers. Comm.; letter dated 11<sup>th</sup>

December 2013). This statement must surely imply that MDDC can invite new representations on both of these adopted documents if it so wished.

It has been made clear to MDDC that local residents have repeatedly questioned the need for the level of development planned. Surely the level of local concern over this matter gives MDDC a mandate for reopening the discussion rather than dismissing residents' concerns with a 'political' response?

Your comment on the above will be appreciated.

Yours sincerely,



Cc

Mr D. Hannon  
Devon County Councillor

Mr Neil Parish MP  
House of Commons

129. / 2575 Ack ✓

18 Uplowman Road  
Tiverton  
Devon, EX16 4LU

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



3<sup>rd</sup> March 2014

Dear Sirs  
**Re: Local Plan Review – Options Consultation January 2014**

We write to object to the inclusion of Hartnoll Farm as an option for further development of Tiverton.

As this Local Plan Review will supersede the Core Strategy 2006-2026, the AIDPD 2010 and the 2013 Development Management Policies, we should record, again, our objections to the scale of the proposed EUE development.

Since 2006/7 when MDDC started developing its plans for the Tiverton EUE under the Labour Government's schemes and exacerbated now by the current Government's National Planning Policy Framework, the originally declared reasons for the scale of the development of Tiverton have been undermined by the economic, social and political policy changes that have occurred over the last five years.

Tiverton's internally generated population increase demands are not sufficient to warrant the construction of the 1000-1500 houses planned for the EUE and therefore, certainly not for the EUE area plus an additional 1000 or more houses on the land at Hartnoll Farm.

Certainly, if you allow houses to be built, people will arrive to occupy them but they will not be the local people that MDDC claims, nor will they enjoy local employment and travel by bus, on bicycles or on foot as also imagined by MDDC.

Before pursuing plans to so drastically increase the area covered by Tiverton by some 30% with the EUE and the additional 70 hectares of Hartnoll Farm, MDDC really must pause and completely review the need to do so.

The Government's National Planning Policy Framework (NPPF) (published March 2012) refers to the United Nations General Assembly Resolution 42/187 which defines sustainable

development as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Mr Neil Parish MP informed us that '*in the UK, the amount of agricultural land available has decreased from 39% to 25% between 1989 and 2009*' and more is disappearing under concrete year on year. MDDC's Planning Committee rejected the Hartnoll2 application for reasons that included 'the loss of 7.9 hectares of Grade 1 agricultural land contrary to policy S9 of the Mid Devon Local Plan'. This current Local Plan Review document refers to 70 hectares of land at Hartnoll Farm which is half as much again as the EUE area of 153 hectares. Both of these areas contain much high-grade agricultural land which both we and future generations can ill-afford to lose.

Paragraphs 8 and 9 of the NPPF states that '*Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment as well as in people's quality of life*' this includes '*moving from a net loss of biodiversity to achieving net gains for the future;.....*'. In addition, in Paragraph 112 of the NPPF, it states that '*Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality*'.

The rapidly increasing loss of high-grade agricultural land and MDDC's support of schemes that will concrete over more and more of such land is totally contrary to the demand by our Government and local residents not to compromise future generations ability to meet their own needs, in this case, of food production and a healthy environment. The loss of large swathes of open countryside will result in a loss of local rich biodiversity which cannot be regained for future generations.

**We, alongside many others, have already taken issue with the MDDC's plan in relation to the scale of the EUE. We believe its adverse effects on traffic numbers and flows, our environment, local infrastructure and services etc. will be far more severe than the picture painted by MDDC. Surely MDDC, and DCC, should monitor the real effects of this development on our environment, roads, schools, the town and all the necessary support services before near doubling the new housing stock in the same area at Hartnoll Farm.**

If MDDC could, eventually, justify the need for such scales of new build for such a small town then some account should be taken of footprint design. Stringing a development along the A361 roadside makes no sense whatsoever in relation to access to resources. It makes more sense to go to the North of the A361.

There is much potential development land north of Gornhay Cross, which has greater development possibilities than Hartnoll Farm. This area is closer to the centre of Tiverton, it has far better transport links to town centre services, it is close to the A361, and the soil is Grade 2 and 3. The Gornhay Cross area is well away from Knightshayes and the site of the Roman Fort, and well above the Lowman Valley flood-plain, so it is very hard to justify the validity of the statement in Paragraph 2.12 of the draft LPR (Local Plan Review) that '*Development north of the A361 would be divorced from the town and have unacceptable impacts on flood risk, a scheduled ancient monument and the setting of Knightshayes Park and Garden*'.

The notion, as stated by Mr Guscott during the 'consultation', that a view must be maintained

between Knightshayes and Heathcote factory is a relic from the nineteenth century when the factory owner lived in the house. Many factory owners of the time ensured the same situation but much has changed since then and this cannot be a serious reason now for not 'going North' with development of Tiverton if such development is justified. MDDC should surely re-consider this alternative option very closely.

MDDC's Local Plan 3 (September 2012) states that new development should improve the environmental conditions in the area; also, the health and well-being of residents is stated to be of primary concern (DM/7) which also implies that development will not be permitted where direct, indirect and cumulative effects of pollution will have an unacceptable negative impact on health, the natural environment and general amenity. Building on even more pristine open countryside in a rural landscape at Hartnoll Farm in no way accords with this statement. This view was supported by the MDDC's Planning Committee who rejected the Hartnoll2 application partly on the grounds that 'the proposal by virtue of its location in an open agricultural area would have an adverse visual impact on the character and appearance of this rural area'.

Much of Hartnoll Farm is visible from an extensive area to the south and west and development there would have an adverse visual impact on the character and appearance of this rural area. The nearby Grand Western Canal is one of Mid Devon's main tourist attractions. It is a designated a Conservation Area, County Wildlife Site and Countryside Park, and the towpath is also part of the National Cycle Network. Visitors enjoy extensive views from the canal across attractive countryside, and development of Hartnoll Farm would mean that these views would be lost. Vegetation screening is not an acceptable alternative as it would be a barrier to the views. In Paragraph 17 the NPPF lists core planning principles, referring to the need to '*contribute to conserving and enhancing the natural environment .....Allocations of land for development should prefer land of lesser environmental value*'.

As public servants, MDDC should take true account of residents' expressed views and ensure that brownfield sites are taken up first with any new development. Where greenfield sites are necessarily to be used then only land of the poorest agricultural grades should be considered for such purposes.

The general environment, topography and infrastructures of Tiverton do not suit such massive new developments and if MDDC aim to provide for a major population growth in mid-Devon then perhaps, a new community would be more appropriate. Any such plan though must take into account the matters raised above concerning agricultural land values in relation to food production and associated sustainable development as defined; we cannot grow, or buy, more land.

Yours sincerely,

 Dr & Mrs C. Bell