

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

10 Glebelands Road
Tiverton
EX16 4EB



15th March 2014

Dear Forward Planning Team,

Draft Local Plan Review

I am writing to object to Option 1 in the Local Plan Review, the possible further extension of Tiverton eastwards to the Grand Western Canal, which would include most of Hartnoll Farm.

In my opinion Tiverton will have enlarged much too far in this direction already by the mid 2020s and I am totally opposed to further eastward expansion. The rural landscape east of Manley Lane forms an ideal green corridor between Tiverton and Halberton and this would be destroyed if Hartnoll Farm were to be developed. There is a real danger that the individual character of Halberton would be lost and that it would, in effect, become a suburb of Tiverton.

The development would also have a severe adverse effect on the Grand Western Canal, one of Mid Devon's main tourist attractions, as it would mean the loss of many fine country views. In my view Hartnoll Farm should be retained as farmland: as it is situated in an attractive area of Devon countryside and it is potentially a highly productive enterprise with valuable Grade 1 soils, which are scarce in this area.

Another potential problem is that traffic problems would be exacerbated on the inadequate local roads in Halberton and even smaller roads immediately around Hartnoll Farm. Halberton village already experiences considerable road congestion and road safety issues and the building of 1100 houses at Hartnoll Farm would make these problems not only worse but also completely unacceptable.

In my opinion Option 2b (Cullompton East) is much more preferable. I strongly favour this option over the one sited at Junction 27/Willand (2a) as I believe that any residential and commercial development should be placed close to an existing centre of population, ideally a town of reasonable size. Indeed, several aspects of option 2a could easily be incorporated within the Cullompton scheme such as the large undercover food court. Existing facilities and new development can feed off each other to produce a successful future.

I believe that if option 2a is progressed then it will have disastrous effects on both Tiverton and Cullompton.

I am attaching below a more detailed listing of my objections to Option 1 and Option 2a, together with support for Option 2b.

I would also like to comment on the proposal that land at Tidcombe Hall should be retained as an existing contingency housing site – policy TIV10. This site is next to the Grand Western Canal Conservation area and almost surrounds Tidcombe Hall itself and as such, if developed, would have considerable impact on the Canal. It would destroy the fine country views southward from the canal towpath and could result in the canal losing some of its appeal as a tourist attraction due to further overdevelopment along the edge of the canal. If the development of Tiverton's Eastern Area Extension goes ahead I cannot see that this site at Tidcombe would be required for further housing, especially at such a high density of 40 dwellings per hectare. I strongly object to this proposal and suggest that this contingency site should be deleted from the Local Plan otherwise Tiverton could lose a valuable asset and amenity.

Yours faithfully

T E Procter

REASONS TO REJECT THE HARTNOLL FARM OPTION IN THE LOCAL PLAN REVIEW AND TO SUPPORT THE CULLOMPTON OPTION

1. Hartnoll Farm is 2 km from Tiverton, and a considerable distance from urban services. Because of physical constraints, such as steep slopes and flood plains, and MDDC's existing policy not to build north of the A361 (which should be urgently reviewed), Tiverton is already being squeezed further and further eastwards and is becoming an unsatisfactory linear-shaped town.
2. The soil of much of Hartnoll Farm is classified as Grade 1, which is the very best and most versatile land. I understand that there is very little land of such quality in this area of Mid Devon, and good quality farming land is in short supply. In Paragraph 112 the NPPF (National Planning Policy Framework) 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'*.
3. The C769 road through Halberton has already reached capacity levels, and it could not cope with the extra vehicular movements which would inevitably be generated from new housing developments at Hartnoll Farm, totalling 1100 dwellings. There are currently several places where pedestrian pavements disappear and placing of several 'precedence' traffic signs can cause confusion. Also many vehicles do not observe the 20 mph speed limit.
4. I understand that new residential development at Hartnoll Farm would trigger the building of a new relief road to the north of Blundell's School ('TIV 4'), resulting in the loss of amenity for many people, including residents of Gornhay Orchard and Coleman Close, as well as a potential increase in flood risk in the Lowman flood plain, and the possible closure of Jane's Scrap Yard.
5. Hartnoll Farm is east of Manley Lane, outside the boundary of Tiverton and wholly within the parish of Halberton, forming a natural and attractive 'Green Belt' between Tiverton and Halberton. The appeal of this would be destroyed by further development, and, if new development were to reach the Grand Western Canal, the housing would, at Crown Hill, join up with the built-up area of the village of Halberton. This urban sprawl would have the potential to destroy the sense of community and the individual character of this village.

6. The Grand Western Canal is one of Mid Devon's main tourist attractions. It is a designated Conservation Area, County Wildlife Site and Countryside Park, and the towpath is also part of the National Cycle Network. Both visitors and local residents enjoy extensive views from the canal across attractive countryside, and the development of Hartnoll Farm would mean that these views would be lost. Vegetation screening is not an acceptable alternative as it produces a green corridor with very limited views. In Paragraph 17 the NPPF lists core planning principles, referring to the need to *'contribute to conserving and enhancing the natural environmentAllocations of land for development should prefer land of lesser environmental value'*.
7. 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.
8. Unless the possible development was carefully managed there would be a considerable increase in surface water runoff into the Ailsa Brook, which has frequently flooded in the West Manley Lane area, and is the main source of water to the environmentally sensitive Tidcombe Fen SSSI. In Paragraph 103 the NPPF states that *'when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding informed by a site-specific flood risk assessment'*, and, in Paragraph 118, that *'proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effectshould not normally be permitted'*.
9. Recent experience of almost continuous storms and rainfall over the period since the beginning of December 2013 provides evidence that flood risk should now be given a high priority when future developments are planned. It is now possible that the UK could experience longer periods of time when weather systems do not change. Hence, there would appear to be increased risk of flooding in this area and it should be expected more often. Any future development should have an exposition of what effect this will have on flood risk and a fully proofed description of how this will be overcome.
10. There is much potential development land north of the A361, especially 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'*. MDDC should surely urgently consider this alternative option very closely.

- 11 Option 2b (Cullompton East) has greater transport advantages over Option 1, being near Junction 28 of the M5 and close to a proposed new railway station. In addition, it would have excellent access to the many existing and proposed future urban facilities in Cullompton. It also has current potential to be an attractive location for industrial, commercial and retail development and it would be an ideal residential location for people commuting into Exeter, Taunton and elsewhere along the M5. Cullompton is now seen as a good place to build and develop residential accommodation. It already has a regular thriving Farmers' Market and there are proposals for a new swimming pool to be built at Padbrook Park.
- 12 Option 2a (Junction 27/Willand) is, I strongly believe, a development that could have considerable unfortunate effects on both Tiverton's and Cullompton' centres. It is reminiscent of 1980s out-of-town shopping developments and nowadays few people would disagree that these retail parks are a major reason for the decline of existing town centres over recent decades. Tiverton town centre already faces criticism that it has little more than charity shops and cafes and I believe that the J27 proposals will do more harm to the town if allowed to progress. A similar detrimental effect would also happen to Cullompton where there has been greater comparative decline in recent years. Indeed Tiverton Town council has plans to develop the Pannier Market and this could be a waste of money if J27 development goes ahead.
- 13 One of the suggestions behind the J27 development is that it will encourage people to spend more money in Mid Devon instead of driving straight through to Cornwall and North Devon. I would question if there is evidence that this could, in fact, happen. Is there any evidence that this has happened elsewhere in the past? I would contest that people would probably prefer to carry on driving and thus get to their destination quickly rather than stopping and buying here. Any use by local residents may have the effect of transferring money away from the area if national outlets are based here.
- 14 I fully understand the need for Mid Devon Council to plan for future increases in accommodation. Given the expectation that future housing demand will increase driven by demographic changes, it is essential that Mid Devon plans for more growth in housing as well as commercial accommodation to support local employment, but this must be in the correct place, which could be Cullompton. I have seen comments by the public in the local paper that there is already a sufficient supply of housing in Mid Devon but a recent report (The Gazette February 18 2014) says that a "shortage of homes coming onto the housing market is pushing house prices higher" and that "the market in the south west is the strongest it has been for some time". The conclusion is that "prices go up ... driven largely by the lack of properties." This will only continue until more supply of houses and flats is allowed.

