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St Catherine's Court
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Local Plan Review Consultation

Forward Planning

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Mid Devon District Council

Phoenix House

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Tiverton EX16 6PP

Via email: planningconsultations@middevon.gov.uk

Dear Sir / Madam



Mid Devon Local Plan Review – Options Consultation

Comments on behalf of Blundell's School

The attached comments are submitted on behalf of Blundell's School in response to the above consultation exercise currently underway. These comments focus on the potential implications from proposed development within proximity to the School campus, notably the School's land within site allocation TIV4 and the proposals within Site Allocations close to the School campus including TIV1 and TIV2. As you will be aware the School has been involved in detailed discussions regarding the implications of the Eastern Urban Extension with the site promoters, the Council and the County Highways Officers.

The comments below follow the questions as set out within the online questionnaire, however we have only responded to those questions which are relevant.

Policy S3 Amount and Distribution of Development – Which option do you prefer and are there alternative options we should consider?

- ***Option 1 Continue to focus most development in the towns up to 2033***
- ***Option 2 Focus development after 2026 in a new community***

In light of the well-rehearsed concerns of the School regarding the impact of the Eastern Urban Extension of Tiverton on Blundells Road and the School campus, we have major concerns with additional development beyond the current adopted policy position onto land at Hartnoll Farm. We therefore have concerns with regards to option 1 regarding the focus of most development in the towns. Further comments are provided in response to the site allocations question below.

If the Council chooses to pursue Option 2 under Policy S3 (the new community option), which location would you prefer and why?

- **Option 2(a) - Land at Junction 27 and adjoining Willand**
- **Option 2(b) - East Cullompton (east of Junction 28)**

At this stage the School is not in a position to comment on which of the above options would be favoured given the lack of detail, however fundamentally we would need to understand the impacts of traffic flow from Option 2a regarding the approach to Tiverton and confirmation that all traffic would be expected to use the North Devon Link Road rather than Willand Road and also the route through Sampford Peverell which both in turn link onto Blundells Road.

Policy S9 Infrastructure – Do you support these policies or have suggestions about how they could be improved?

Given the current uncertainties about the delivery of the Tiverton Eastern Urban Extension infrastructure (notably the link to the A361 and the additional link to Heathcoat Way) specific reference to the EUE infrastructure requirements should be made within the policy going forward.

Policy S11 Tiverton Strategic Policy – Do you support these policies and do you have suggestions about how they can be improved?

We note the policy aspiration for the requirement (item c) to “retain the green setting provided by the steep open hillsides, particularly to the west and south of the town and the historic parkland of Knightshayes to the north of the A361”. Given the pending conservation area designation of Blundell's School and surroundings we believe that the setting of the east of the town should be recognised within this policy with reference to the conservation area (if designated).

Paragraph 2.45 refers to the prospects of allocating land at Hartnoll Farm to the east of the Eastern Urban Extension to meet development needs to 2033. Given the fundamental concerns of the School regarding the detrimental impacts on the School campus from the existing allocation, we do not believe that further additional development would be appropriate. At this stage, therefore the School would support an alternative option for long term development away from this side of Tiverton given the constraints identified.

Site Allocations – Tiverton – Please tell us your specific opinion on specific sites in this chapter of the Plan.

Policy TIV1 Eastern Urban Extension: The School has been in discussions with the Council, Devon County Highways and the landowners with regards to the emerging EUE proposals. The School accepts that they cannot question the principle of development given the adopted nature of the Core Strategy and Site Allocations DPD. However the School is still seeking a robust and considered assessment of the impacts of the development as is now proposed in light of the proposed changes to the form and phasing of infrastructure to that of the adopted policy position. We refer to the requirement that “the policies and requirements of this Development Plan Document are part of the development plan, and should not be overturned lightly and without clear justification” (Site Allocations DPD para. 5.9).

The School's appointed transport advisors, Hydrock have noted a number of concerns with the technical evidence provided by the applicants and Devon County Council to date with regards to the traffic impacts and assumptions including those on Blundells Road. Therefore at this stage the School cannot accept a deviation away from the infrastructure requirements as currently set out within the Core Strategy and Site Allocations DPD. On this basis the School would seek to ensure that any amendments to policies AL/TIV2 - 7 are carefully considered and with "clear justification" to ensure that they are based upon a sound evidence base which we believe is currently not in place.

Policy TIV 2 Hartnoll Farm: The School has fundamental concerns with additional development east of the existing EUE proposals given the envisaged impacts on the School campus and particularly impacts upon Blundells Road. The additional allocation of land in this location would need to be considered in the context of the existing allocation

In addition, such a large proposal without any concept of self-containment through supporting employment provision would appear contrary to the Council's proposed Sustainable Development Principles as set out within Policy S2.

The policy criteria within (a) to (h) makes no reference to the need to consider impacts on Blundells Road. We note the requirement within paragraph 3.17 for consideration of an access through TIV4 Blundells School and reference to the need to align principles of the master planning work for the existing allocation and contributing costs towards infrastructure provision. Given the current uncertainty regarding the infrastructure provision for the existing allocation (not helped by the number of landowners), we have concerns with regards to the ability to stitch in with the existing allocation and for the required infrastructure to be brought forward at the earliest opportunity in accordance with any policy requirements. If an alternative route to Blundells Road was delivered (either through TIV4 or an alternative route) then the School would be seeking to ensure that Blundells Road access would be restricted accordingly.

Therefore the School does not support the potential allocation of TIV2. If the allocation was however progressed then the School would seek reassurance that the infrastructure delivery is investigated and committed to in full within the policy text at the earliest opportunity rather than left for later challenge and discussion as is the case with the current adopted EUE proposals.

Policy TIV4 Blundells School: The School owns the majority of this land allocation and essentially all of the greenfield land which is not constrained by contamination issues or proximity to the scrap yard. Whilst access is currently proposed from the west of the allocation further options maybe pursued should the allocation be reduced to the School's land. Therefore the School would propose that their land (at least) remains allocated on the basis that it is available and potentially deliverable. We do note however that if the site allocation was to be removed, given the location within the defined settlement boundary and proximity to employment opportunities and the town centre that the site would provide an appropriate windfall opportunity should future development be proposed.

With regards to the policy wording:

- We object at this stage to the proposed policy requirement (e) and the text within paragraph 3.20 which notes that the road link to Heathcoat Way is no longer required in connection with the adopted Tiverton EUE. As noted above the School's transport advisors Hydrock have identified a number of concerns regarding the assumptions that the second link from the EUE is no longer required.
- We understand that the requirement with item (c) to retain approximately 8 hectares is identified to reflect potential flood risk requirements. However, we would seek further flexibility within this policy to allow for development within this area if suitable measures (such as ground raising) could take place (and were acceptable to the Environment Agency).

Policy TIV10 Tidcombe Hall: We note that the site of 8.4 hectares at Tidcombe Hall (for circa 200 dwellings) may be proposed as an allocation or retained as a contingency site. Should this proposal come forward we would seek further clarification with regards to the potential impact on Tidcombe Lane and Blundells Road. The School is particularly concerned with the nature of the junction of Blundells Road and Tidcombe Lane and also the safety of pupils crossing Tidcombe Lane which dissects the School playing fields and provides direct access to one of the School's boarding houses.

Policy on Junction 27 and Willand: Any proposals for major development of upto 200 hectares at Junction 27 will require detailed consideration given the potential for far reaching impacts. At this stage the School seeks reassurance that any such proposals would not rely on traffic accessing Tiverton along Willand Road or through Sampford Peverell which in turn lead onto Blundells Road. Suitable controls would be required to ensure that all traffic in and out of Tiverton would therefore use the A361.

The School welcomes the opportunity to provide these comments and will continue to take an interest in the Local Plan Review. The School will also continue discussions with the Council, Devon County Council (highways) and the landowners with regards to the impacts of the Eastern Urban Extension proposals. Please do not hesitate to contact me for any further clarification.

Yours sincerely

Pete Stockall MRTPI Associate - Planning, Development and Regeneration

For and on Behalf of GVA Grimley Ltd

cc. Blundell's School