

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



41, Post Hill,
 Tiverton,
 EX16 4NG

20th 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.

- The soil of much of Hartnoll Farm is classified as Grade 1, which is the very best and most versatile land. There is very little land of such quality in this area of Mid Devon. Good quality farming land is in short supply, and people need food which in turn needs good land on which to grow. I refer you to Paragraph 112 the NPPF (National Planning Policy Framework) which 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'*.
- Hartnoll Farm is 2 km from Tiverton, and a considerable distance from urban services. Tiverton is already being squeezed further and further eastwards and is becoming an unsatisfactory linear-shaped town, because of physical constraints, such as steep slopes and flood plains, and MDDC's existing policy not to build north of the A361.
- 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 consider this alternative option very closely.
- Option 2a (Junction 27/Willand) in the draft LPR has greater advantages for future development than Hartnoll Farm: it is a transport hub, being close to the junction of the M5 and A361 and Tiverton Parkway station; it has the 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. Option 2b (Cullompton East) has similar advantages to Option 2a, 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 urban facilities in Cullompton.

- The C769 through Halberton has already reached capacity levels, and this road could not cope with the extra vehicular movements which would inevitably be generated from any new housing developments at Hartnoll Farm.
- 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.
- 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 thriving village.
- 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. Visitors 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'*.
- 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'*.

Yours sincerely,

A. Robbins