



Corner Oaks
46 Tidcombe Lane
Tiverton
Devon
EX16 4EQ

19th March 2014

Masterplanning consultation
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP

Dear Forward Planning Team,

DRAFT LOCAL PLAN REVIEW

As a long term resident of Tiverton of over 50 years and as a practicing Architect in the area for over 40 years I am fully cognisant with the issues and practicalities of development in the region, area and locality. As such I have a number of concerns (not least the lack of information showing the need and extent of the local plan requirements) relating to the various proposals within the 'Draft Local Plan Review' and am therefore writing to object to those identified below as follows:-

TIV2 – Hartnoll Farm

The possible further extension of Tiverton eastwards to the Grand Western Canal, which would include most of Hartnoll Farm.

I have a number of concerns relating to this proposed site not least that it has severe drainage issues with large areas liable to ground water flooding due to poor drainage that will be exacerbated by the increased loss of drainage area when built on. With this water (even if controlled by SUDS) discharged into the Ailsa Brook, severe impacts downstream will become an issue not only to the Tidcombe Fen but also raising the risk of flooding in lower lying areas.

The site is also at the extreme end of the Tiverton boundary (actually in Halberton Parish) and will link with the Crown Hill part of Halberton thus drawing Halberton into becoming part of Tiverton and therefore creating a linear town with no defined boundary.

The land is also identified as 'Grade 1' and as such is essential to the wellbeing of the locality and nationally as a food resource. There are other sites that could be developed well before this land is considered for development.

Others have set out well defined arguments against this site and I attach those to this letter in support of my objection. If such a large housing requirement has been identified then alternatives need to be explored such as that at J27 (see below).

TIV 10 – Tidcombe Hall

I wish to register my concern and proposed objection to this option at this time due to the lack of information pertaining to it.

The issues relating to this site are principally access. Tidcombe Lane is narrow, has issues of restrictive parking and a narrow access to Blundell's Road to the North. It's most severe restriction is Tidcombe Bridge that has a blind 90 degree corner leading down Tidcombe Lane and has issues with busses and large lorries crossing it. Further development will most likely result in damage to a listed structure.

Canal Hill already has issues at the junction with the Great Western way. Prior to the Great Western Way opening I raised the issue of traffic joining it from Canal Hill and the potential need for traffic control. The then Highways Officer confirmed that further development off Canal Hill could result in serious traffic issues with long queues needing the imposition of traffic control (lights).

There is also the issue of storm water flooding the canal. Unless a well-managed and clearly defined SUD scheme including considerable storm water retention is incorporated, then overflows to the Canal where water management is not well managed will become an issues for the housing to the North of the Canal.

Finally the site is visible form many areas to the North and unless well designed and landscaped will become a blot where the landscape extends into the eastern side of the town.

TIV 13 – Exeter Hill

I wish to register my objection to this option for the following reasons.

The site is elevated and will expand the impact of the 'hillside' development across Canal Hill that already has a significant impact on the town aspect.

Access from the single access of Devonshire Rise is unsuitable without a full through access allowing a constant, viable and available access at all time for residents. The proposal to allow only emergency access from the indicated 2 alternative routes is unsatisfactory. If the present access is obstructed then this could cause serious issues for the residents if there is not alternative escape that is available. In a major incident, with

the present access blocked, the emergency access could be restricted due to emergency vehicles resulting in residents being 'trapped' by the incident.

The present access is inadequate due to the present development being badly designed and subsequently approved by the LPA. The garaging on site and especially that for the 3 storey properties fails to take into account usability and spacial standards recommended by the Highway Authority such that many garages are unsuitable/inaccessible for vehicles. It has proved impossible to exit vehicles that attempt to park in those garages. Many have been converted for storage or habitation with the result that many occupiers have no choice but to park on the highway. Everyday this results in access being limited to single line traffic and give way situations. As this would be the only access for the developer, the site would become virtually undevelopable in its present form.

Strom water controls are of major concern on this site. The lack of Swales and SUDs resulted in properties being flooded in 2012/2013 due to ground water run-off. As a steep site, storm water controls will be difficult if not impossible to achieve.

TIV 17 – Bampton Street/William Street

I wish to object to the proposal to use this site for residential development in its entirety. At present parking is limited in Tiverton and especially in the North of the Town Centre. The loss of car parking in this area will affect businesses substantially and impact bon the viability of the area to sustain business.

The LPA \have allowed retail/business use on the old hospital site with not public parking incorporated in the design. William Street is the only adjacent car park in the vicinity.

Whilst some areas could be considered for residential development, the retention of some public parking is essential.

The loss of businesses and their replacement with residential will also impact on the daytime viability of the area. Local businesses and public footprint all support each other. Low cost premises for many emerging and long term businesses is essential in supporting the viability of the town centre that is already under pressure from edge of town shopping centres. The loss of this area for business with not replacement alternative would be seriously detrimental.

Junction 27

Junction 27 and the land between the farm to the north of Junction 27 and Willand would provide an ideal alternative to the expansion of Tiverton by the provision of a new village/town similar to Cranbrook to the south. It 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.

Willand is an isolated community that has been allowed to expand with little thought to the provision of services for the occupants and their many needs. It depends on Cullompton and Tiverton (the nearest towns for shopping and most services with many commuting further afield to Exeter and Taunton.

The presently advertised proposals by external developers (including cinemas, out of town shopping centre etc.) should be resisted as the proposals could be detrimental to the area as a whole. Consideration should be given to expanding Willand as the 'hub' of a new larger community to take up the expansion needs of Tiverton and possibly Cullompton.

Already it has at J27 rail links to the rest of the country and a fully compliant highway network to the M5. The cost of providing the additional needs (shopping, community, medical etc., etc.) would be considerably less in this instance. Already a limited bus service reaches as far as J27 and Willand village. The expansion of this would substantially reduce the need for non-public transport requirements to be catered for by the inclusion of a full transport policy for the foreseeable future as part of its development.

The land, whilst in part slopes towards the M5 has qualities that would allow drainage issues to be fully catered for without the risk of exacerbating flooding downstream.

With care and consideration in its planning, a model village community could be provided in this location.

Yours faithfully 

Chartered Architect

Attachment relating to TIV 2 – Hartnoll Farm

REASONS WHY THE HARTNOLL FARM OPTION IN THE LOCAL PLAN REVIEW SHOULD NOT BE SELECTED FOR THE FURTHER DEVELOPMENT OF TIVERTON

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, 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. 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 through Halberton has already reached capacity levels, and this road could not cope with the extra vehicular movements which would inevitably be generated from new housing developments at Hartnoll Farm, totalling 1100 dwellings.
4. 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 thriving 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. 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 environment Allocations 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. 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.