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West Manley Lane
Tiverton EX16 4NH

Local Plan Review Consultation
Forward Planning

MDDC

Tiverton
Devon
EX16 6PP



24th March 2014

Local Plan Review: Options Consultation

As a resident living within the proposed boundaries of the EUE I feel very strongly that the Council should consider carefully the alternative options to the EUE, within the Local Plan Review, that would not involve losing valuable farm land, enormous expense and potential damage to tourism and places of historical interest.

Vision and Spatial Strategy

60% of Tivertonians already commute elsewhere to work and particularly to Exeter. The city provides significant employment opportunities of a high technical ability (IT, University teaching, communications) and more corporations are being attracted to relocating their businesses to Exeter.

The Strategy needs to recognise that the percentage commuting from Tiverton to Exeter will only increase as Exeter develops further its high quality employment opportunities. Commuting from Tiverton will continue to increase whilst a family can buy a 3 - 4 bedroom house in Tiverton for the same price as a 2 bedroom house on the outskirts of Exeter.

The strategy will not change this fundamental market demand and therefore the Local Plan needs to recognise and work with the needs of the growing population who will be travelling to Exeter and to a lesser extent Taunton.

This fundamental understanding is not necessarily incompatible with a vision that has as a core objective the protection of Tiverton as a market town.

Policies S1 and S2

I agree with the definitions and the Policies in S1 and S2. I look forward to receiving the Strategic Housing Market Assessment and trust that it will be more accurate than its predecessor.

Policy S3

Option 2: Focus development after 2026 in a new community (and preferably before 2026)

I am very much in favour of option 2, a new community close to Junction 27. Such a new community would be far more sustainable allowing commuters to travel by train rather than car to Exeter, Taunton and Plymouth

Option 2(a) Junction 27 – Gateway to the South West

Rather than burden Tiverton with becoming even more of a dormitory town offering cheaper housing than that available in Exeter or Taunton now is the time to recognise the mass daily exodus and provide a sustainable solution at Junction 27. Rail, bus and vehicle options already exist at Junction 27. It would make so much more sense to have commuters walking or cycling to Tiverton Parkway and catching trains to Exeter or Taunton.

MDDC should be bold and put a halt to the EUE and fast track the much more sustainable option of a new town at Junction 27 that would become the gateway to Devon. As a result MDDC would save the public purse the unnecessary expense of new junction on the A361 and all the infrastructure of the EUE.

Policies S4-S6

I support these and are pleased to see that the council has taken note of previous public responses.

Policies S7-S9

Policy S7 M5 corridor should be used as the location for economic growth making use of the rail links and motorways between jobs and homes.

Policy S8 I agree that the vitality and the viability of the town centres is important and do not see this as a conflict with the development of a new community at Junction 27

Policy S9 I support the policy but doubt if the CIL at £40 per square metre is sustainable for the level of infrastructure required for housing requirements in the current core strategy.

Policy S10

I support this Policy

Policy S11

I am pleased to see the national discussion recommending that changes to the National Planning Policy Framework mean developers of brownfield sites will no longer have to pay huge fees under the Community Infrastructure Levy.

This incentive makes perfect sense and Policy S11 should encourage the development of brownfield sites as the priority.

I welcome the recognition within the policy of the need to *'protect the importance of Tidcombe Fen, and other areas of biodiversity value and green infrastructure, supporting opportunities for enhancement'*. Any development of this area will have consequences to the flooding from runoff that already occurs in both Manley Lane, West Manley Lane and adjacent fields. There is a high risk of water runoff from any development polluting the Ailsa Brook and having a detrimental effect on the Tidcombe Fen SSSI. Again this goes against the core planning principles of *'when determining planning applications, local authorities should ensure flood risk is not increased elsewhere'* Any development that has even the slightest risk of damaging the SSSI should not be permitted.

Site Allocations

Eastern Urban Extension (TIV1)

The Master planning maybe underway but no turf has been cut.

The Masterplan is very quiet in relation to the funding of the EUE. There is no cost benefit analysis and no breakdown of any of the costs associated with the infrastructure required. Simply to say that a bid has been made by DCC of £5.1m towards the cost of the junction to the A361 and works to Junction 27 of the M5 is not good enough. The public needs to know how much the EUE project will cost and how much is to be publically funded.

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Land at Hartnoll Farm (TIV 2)

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.

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.

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.

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*'.

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.

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'*.

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 2b, 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

Policy J27

It is clear that Mid Devon Forward Planning now accept what many have been saying for the last 5 years, namely that large numbers of residents in Tiverton commute to Exeter or Taunton and that no amount of land allocated for employment will be taken up in Tiverton to justify the building of 1000 plus dwellings in the EUE or at Hartnoll Farm

Policy 27 is not new and was presented 5 years ago as an option when the EUE was first suggested.

This area has many advantages over Hartnoll Farm. It is close to major links by road and rail therefore not requiring traffic to pass through built up areas or small villages. A site of 205 hectares has already been recommended that will provide an attractive location for industrial, commercial and retail development. It can also provide development land for affordable housing and is a perfect location for residents commuting to Exeter, Taunton, Plymouth and elsewhere along the M5. The proposals for a Devon promotion centre, retail outlet/village and sports and activity centre will create an excellent 'Gateway to the South' bringing income to the area and deliver many environmental benefits.

Frances Charlton