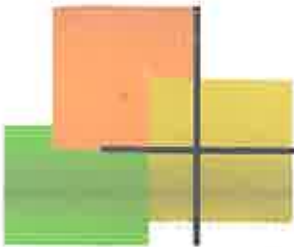


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TIVERTON CIVIC SOCIETY



Registered Charity 1043675

LOCAL PLAN REVIEW CONSULTATION,
FORWARD PLANNING,
MDDC
PHOENIX HOUSE
PHOENIX LANE
TIVERTON
EX16 6PP

JEREMY SALTER,
WINSFIELD,
43, POST HILL,
TIVERTON,
EX16 4NG



20th March 2014

Draft Local Plan Review- Comparison of Housing Options

Dear Forward Planners,
Tiverton Civic Society have examined the various options for the amount and distribution of development, set out in the Local Plan Review, and we are writing to express our concerns about any future further eastward extension of Tiverton, to include Hartnoll Farm:

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 urban sprawl and 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, loss of recreational space at Blundell's School, and the possible closure of Jane's Scrap Yard. Assuming that 1,550 new houses are eventually built in the Eastern Urban Extension, and that Hartnoll Farm is selected for future development, the new road would be built after the building of 450 of the targeted 1,100 houses at Hartnoll Farm. It would be surprising if the cost, and the potential problems involved in building this road for the remaining 550 houses, would not be found to be financially and environmentally unviable.
5. Hartnoll Farm lies 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, and one of the most cherished local landscapes, 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.
10. 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.

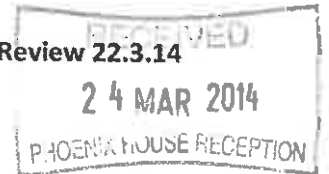
Your sincerely,

Jeremy Salter (Chairman)

Fern Clarke (Secretary)

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Tiverton Civic Society. Supplementary Response to Mid Devon Local Plan Review 22.3.14



Policies S1 and 2: Vision and Spatial Strategy

The Society support Policy S1 with the following emendation to para. 3 'Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision than the Council will grant permission, **provided that the proposed development is on land within the areas proposed for development in the most recent plan, and** unless material considerationsrestricted.

The Society support Policy S2 with the following addition to e) **and ensuring that air quality and noise levels from traffic arising as a consequence of large new developments remain within permitted air quality and noise levels.**

The Society would also like to see a policy included that protects Grade 1 farmland from development as this is essential to the long term sustainability of provision for future generations.

The Society supports the principle of sustainable development but wish to see policies included that cover sewage disposal from new large housing and employment developments, as well as policies on the location of new waste to energy plants within proposed areas for development and on *all* new forms of renewable energy production that could be located within both the built and rural environments.

Policy S3: Distribution of development

Tiverton Civic Society is of the view that there is very limited land left in Tiverton for development if no development takes place north of the A361 towards Bolham. The Society strongly opposes development on the proposed Hartnoll Farm site which is not within the boundaries of the town and is Grade 1 listed land, as well as providing an attractive rural entry to the market town. It is also opposed to development at this site due to issues on traffic generation which would inevitably put the air quality and traffic noise on existing residential roads over permitted limits. In any analysis of the dspread of geographical settlement, this would be classed as 'ribbon development' which is generally unacceptable as a form of development.

The Society is of the view that Option 2 should be pursued, focusing development on a new community on land at Junction 27 which is well served by both road and rail links.

Policy S4: Housing Policy

The Society is in broad agreement with this policy. We have some concern with the level of housing density proposed for town centre development, and with the continued affordable housing level of 35% in the Tiverton Eastern Urban Extension which may mean that the viability of development is put into question. Given the high cost of road infrastructure that needs to be in place before any property in the proposed Tiverton Eastern Extension can be occupied, we feel that the affordable housing level in this area should be 25%.

Policy S5: Housing Delivery

While it is desirable to deliver housing to a set plan, the last few years have shown that this is governed by market conditions. The Society feel the targets for action are high, as are the cumulative targets. The Society is in agreement with having contingency sites provided there are no material considerations against development at these sites, such as flooding, excess traffic generation on unsuitable roads, sewage disposal considerations and so on. The Society also feels there should be an upper limit on development if the targets are overreached, and provision should be made in the local plan to consult on new sites before this situation is reached.

Policy S6: Public Open Space

The Society is in agreement with this policy.

Policy S7: Employment (also applies to Policy J27)

The Society is in agreement with this policy, and feel that the Plan should specify types of use of employment that would be accepted on land adjacent to the M5, at both Junctions 27 and 28, to ensure that:

(i) the land acquired for employment use actually employs a significant workforce and is not simply a storage area for national / multinational firms.

(ii) the land is used for purposes that employ a significant percentage of professional and similar staff to reduce the current 'brain drain' from the Mid Devon area.

(iii) That the area is designated an entrepreneur centre with work units for assisted start up businesses mentored by established businesses that also locate there

Policy S8: Town Centres

The Society is in agreement with this policy but would like an addition to d) that ensures that air quality, noise is kept within permitted limits.

The Society would like a policy added that ensures that the sewage disposal infrastructure is upgraded to meet the requirements of new development and does not impact negatively on any parts of the existing built environment.

Policy S9: Infrastructure

The Society agree with policy S9 with the addition of all relevant comments on infrastructure already mentioned for earlier policies. The Society would like to see a clear statement that new housing development cannot be occupied before an adequate road structure to town centres and major trunk roads is in place that avoids unavoidably narrow roads (as eg in Cullompton) and avoids increasing traffic through unsuitable locations (eg through the middle of a school).

Policy S10: Environment

The Society support this policy but feel it does not go far enough to address the problems face in the District.

c) should also cover sewage disposal

d) should also cover air quality and noise levels of renewable energy plants which should be within permitted levels, and should cover acceptable levels of traffic generation from lorries in biomass plants.

Policy S11: Tiverton

As stated earlier, the Society is strongly opposed to development at Hartnoll Farm for the reasons already given. The Society does not wish to see ribbon development to the east of Tiverton, and believes that Halberton should be retained as a distinct and separate village.

The Society agrees with policies a) - e)

Site Allocations: Tiverton

The Society accepts that existing allocations in the DPD need to be retained.

The Society opposed TIV2 - development of Hartnoll Farm for reasons given above.

The Society feel that TIV11 and TIV 13 contradict Policy S11c) and on these grounds oppose it.

The Society strongly oppose the allocation of Tiv16. The wide pedestrian street of Phoenix Lane is at the heart of the character of Tiverton as a town and provides exceptional views of the hills to the south which few other towns could boast. Along with the Pannier Market, this street provides a wonderful venue for fairs and town celebrations. If tourism in Tiverton is to be encouraged (as Policy S8 Para 2.38 states), this street should be retained in its current form.

The Society are of the view that the development proposed for TIV 17 has an excessive housing density.

Policy J27 Land at M5 Junction 27 and adjoining Willand

The Society are broadly in agreement with this policy.

