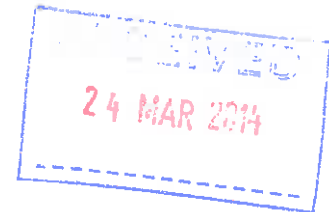


Old Cordwents, 1 Lower Town, Halberton, Tiverton, Devon EX16 7AU

21 March 2014

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



Dear Sir or Madam

MID DEVON LOCAL PLAN REVIEW - OBJECTION

I write to express my objections to the Local Plan Review, specifically the proposed housing site identified as Land at Blundells Road, Halberton in the Options Consultation document. I have five main areas of concern arising from the use of this land for housing, namely 1 the impact on my residential amenity; 2 the impact on highway safety as a consequence of additional traffic movements; 3 the impact on the setting of a grade II* listed building; 4 the impact on the character of Halberton Conservation Area as a consequence of the proposed use of the land and the creation of the necessary site access; and 5 the loss of grade 1 agricultural land.

With regard to impact on residential amenity, it is clearly impossible at this point in time to assess harm in detailed terms but the local topography and site circumstances are such that there is undoubtedly the potential for significant harm. My property abuts the eastern boundary of the proposed site and the house fronts on to the west side of Lower Town; from my rear (western) boundary the land that will comprise the housing site rises to the north west. In addition, my rear garden immediately behind the house is relatively short, and is of an unconventional layout extending to the south west. Thus there is great potential for overlooking of all parts of my garden and into windows on the rear elevation of my house. This impact is exacerbated by the comparative elevation of the proposed housing site, which also makes mitigation more difficult to implement. The elevation of the site also means that there will be a greater feeling of overbearing development than would otherwise be the case.

It is proposed that the site will accommodate 25 houses, with an access on to Lower Town. The provision of 25 units will give rise to a substantial increase in vehicular traffic movements. This will be significantly detrimental to highway safety because Lower Town is of restricted width and has a twisting course, which together preclude good forward visibility. The additional traffic will also be particularly detrimental to use of the highway by pedestrians and cyclists.

Old Cordwents has historically been subdivided into two residential properties and is a grade II* listed building; both properties have a barn in their rear gardens which are also listed by virtue of being curtilage buildings. Mention has been made of the proximity of the house to the proposed housing site and the larger of the two barns, which is within my property, directly abuts the site. Site circumstances are therefore such that the proposed housing site would significantly impact on the setting of the listed house and barns. It is important to note that once eroded, that setting can never again be restored, and I would draw your attention to the relative scarcity of grade II* listed buildings.

The proposed housing site lies wholly within Halberton Conservation Area, a fact which in itself is cause for concern due to the need for exceptionally well designed architecture. Plan 5 of Halberton Conservation Area Appraisal (the Appraisal), delineates 'visually important space' and shows that the whole of the proposed housing site falls within one such larger area. Development of this land should therefore be resisted in principle.

A specific harm that will arise from the use of the land for housing is a consequence of the elevation of the land. The development will be readily seen from Lower Town and other vantage points in the vicinity, and in such views the development will appear to dominate the conservation area which is inappropriate. The Appraisal states in section 4 that the rural character of Halberton "... is also defined by the frequent views of open countryside from various locations within the village ...". Such locations and views are not limited to those that may be delineated on a map, and in this instance it is the view northwards up Lower Town that will be compromised by the proposal. Thus not only would housing development mar the character of the conservation area, it would also remove a key feature that defines this particular conservation area.

Plan 7 of the Appraisal identifies important unlisted buildings within the conservation area. One such is the agricultural building that abuts the northern boundary of my property and which historically was part of the original farm complex. It appears that the building has been excluded from the proposed housing site but that the site abuts the western and northern elevations of the building. This situation renders the building isolated, difficult to find a use for and consequently unlikely to be maintained. On a practical note, the proposed use of the land for housing must ensure that access for the maintenance of both this building and my barn is safeguarded.

In order to create an access into the housing site that will satisfy the requirements of the Highway Authority, significant work will be necessary including the removal of existing walls and hedges along the side of the road and alterations to the profile of the land. This will inevitably have a significantly detrimental impact on the character of the conservation area. Plan 6 of the Appraisal delineates boundary walls that are a key feature of the conservation area; they include walls on both sides of Lower Town and, significantly, along the whole of the road frontage of the proposed housing site. Section 5 of the Appraisal describes the sense of enclosure that is experienced in many parts of the conservation area, and notes that "Along many of the lanes, high boundary walls provide a similar enclosed appearance". Their removal would not only result in the loss of one of the defining elements of the conservation area, but would alter for ever the character of Lower Town since the sense of enclosure would be erased.

Most of the proposed housing site occupies grade 1 agricultural land. Grade 1 agricultural land covers just 3.48% of the land in Mid Devon, and its protection should therefore be an imperative. Whilst the land in question may currently be underused, that is essentially a consequence of the ownership and is not a reason to allow its loss from agriculture.

Turning to the Local Plan Review Options Consultation Interim Sustainability Appraisal, it is my view that the scores awarded in respect of two of the sustainability objectives should be lower. In the case of B) the protection and promotion of a quality built and historic environment, reference is made to a group of listed buildings on the east side of the site. However the assessment should identify these as grade II*, the scarcity and significance of which should increase the negative impact of the proposal. The commentary also fails to mention the designation of the site in the Appraisal as 'visually important space', and the fact of the existence of an unlisted building of importance. In the light of these circumstances a score of -3 is more appropriate.

In the case of I) delivering the necessary infrastructure, the commentary is ambiguous. It states that "An access direct onto Lower Town road is achievable, a neutral effect" but goes on to state that "...some road improvements ..." would be necessary. It is unclear what these improvements would comprise, and wholly false therefore to assess the provision of a new access as having a neutral effect. For the reasons outlined above, that would be far from the case. The commentary also states that a full capacity study is required to demonstrate whether additional traffic can be accommodated. Given the impact on the character of the conservation area that the creation of a site access, let alone any further highway improvements as may be deemed necessary, will have, an assessment of a slight negative effect is unrealistic and the score should be amended to -3.

Finally, I would draw your attention to an alternative development site in the village, namely land off Fishers Way. This is a site that the Parish Council have identified as a possible alternative housing site. Like the proposed housing site, this land lies outside but adjacent to the defined settlement boundary, but crucially it is not within the conservation area and development here would not impact on its character. It should be noted that the layout of Fishers Way has anticipated the expansion of this modern development further to the west in due course.

Taking all the circumstances together, the proposed use of land at Blundells Road for housing is entirely unsustainable and I trust that this site will not go forward for consideration by an Inspector.

I would be obliged to receive an acknowledgement of this letter.

Yours faithfully

Alison Thomas