



West Manley Lane Conservation Group (WMLCG)

Response to

Mid Devon District Council's Local Plan Review (LPR) Options Consultation

WMLCG was formed by a body of like-minded local residents seeking to protect and enhance the surrounding unique environment from the potential loss of its amenity to both the people and wildlife, in the event of any future unsuitable plan for development. Its members are pleased to contribute to the development of the current **LPR**, particularly on those parts of the document that pertain to its areas of interest and concern.

It is encouraging to note that much of the input from individuals and organisations such as ours has been taken note of and incorporated into the **MDDC** plans following various consultation exercises, for which we must compliment those concerned.

However, we question the effect that the **Tiverton Eastern Urban Extension (TEUE)** will have on the overall development requirements of Tiverton for the next twenty years and beyond; therefore it is unfortunate that **LPR** has been put out for consultation before any decision on **TEUE Masterplan (MP)** has been reached; clearly a number of unresolved matters relating to land for housing, employment and infrastructure are interlinked

Vision and Spatial Strategy

Whilst **WMLCG** is impressed with the list of ideals, it is left wondering how many are realistically achievable, how the loss of grade one agricultural land and environmental threats marry with "attractive countryside providing for biodiversity and employment" and "tourism and leisure enterprises".

Further, a significant percentage of Tivertonians already commute elsewhere to work and particularly to Exeter which 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 and Taunton

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. 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, commuting from Tiverton will continue to increase.

The strategy will not change this fundamental market demand and therefore the **LP3** needs to recognise and work with the needs of the growing population who will be travelling to Exeter, Taunton and beyond.

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

We agree with the definitions and the **Policies in S1 and S2**. We look forward to receiving the **Strategic Housing Market Assessment** and how it will affect the proposed future requirements. We trust that it will be more accurate than its predecessor.

Policy S3

We are 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. We question why **option2a** is not considered as a suitable development *before* 2026. 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 working exodus and provide a sustainable solution at **Junction 27** where rail, bus and vehicle options already exist. 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 **TEUE** 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 **TEUE**.

Policies S4-S6

We 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 We 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 We support the policy but doubt if the **Community Infrastructure Levy (CIL)** at £40 per square metre is sustainable for the level of infrastructure required for housing requirements in the current core strategy.

Policy S10

We support this policy

Policy S11

We are pleased to see the national discussion recommending that changes to the **National Planning Policy Framework (NPPF)** mean developers of brownfield sites will no longer have to pay huge fees under the **CIL**.

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

As in our response to the current **TEUE MP**, we welcome the recognition within this 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 Site of Special Scientific Importance (TFSSSI)**. Clearly 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 **TFSSSI** should not be permitted.

Site Allocations

Eastern Urban Extension (TIV1)

TEUE MP maybe under consideration but no turf has yet been cut. It is very quiet in relation to the funding of the **TEUE**. 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 **Devon County Council** 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 TEUE 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 fertile; there is very little land of such quality in this area of Mid Devon, and good quality farming land is in short supply thus making the policies of agricultural self-sustenance and fewer food miles increasingly untenable.

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 the loss of these views. Vegetation screening is not an acceptable alternative as it produces a green corridor with

limited vistas. 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 **TFSSSI**. 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 **Local Plan Review (LPR)** 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** and **Policy J27** outline greater advantages for future development than **TEUE** and/or **Hartnoll Farm**. As previously mentioned, it is clear that significant numbers of **Mid Devon's** residents commute to **Exeter**, **Taunton** or beyond and that no amount of land allocated for employment could be taken up in **Tiverton** to justify the building of **1000 plus dwellings** in the **TEUE** or at **Hartnoll Farm**.

Policy J27 is not new; it has been revisited on numerous past occasions and was presented five years ago as an option when the **TEUE** was first suggested and again in **MDDC's Economic Development Strategy 2012**. Its development potential is even now undergoing further consideration.

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 along the M5 corridor. 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.

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.

The combined development potential at and around both Junctions 27 and 28 could make good use of existing networks, ensure local employment, protect encroachment onto sensitive environmental areas and allow more room for less house building.

Is **MDDC's** long term development

- Being undertaken merely in response to Government pressure?
- Seeking to supply *local people* with suitable housing and work?
- Simply providing those from outside Mid Devon with relatively cheaper housing from which to commute back out?
- Realistic in its vision?
- Based on credible statistics?

In our opinion, **LPR** remains a 'work in progress' until other local development strategies are finalised, current population trends and requirements are published, the UK's financial situation is stabilised and the various relevant Government policies stop changing.

We look forward to learning the outcome of the review.

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