


**OPTION-3: DEVELOPABLE AND NON- DEVELOPABLE AREA FOR HOUSING**

Developable Area		Non-developable Area	
Boparan Site	1.21 Ha	Boparan Site	0.03 Ha
Blundell's School Site	4.41 Ha	Blundell's School Site	5.63 Ha
E.B.Jane's Scrapyard	0.00 Ha	E.B.Jane's Scrapyard	0.68 Ha
Garage Site	0.00 Ha	Garage Site	0.00 Ha

**DEVELOPABLE AREA FOR B1 USES**

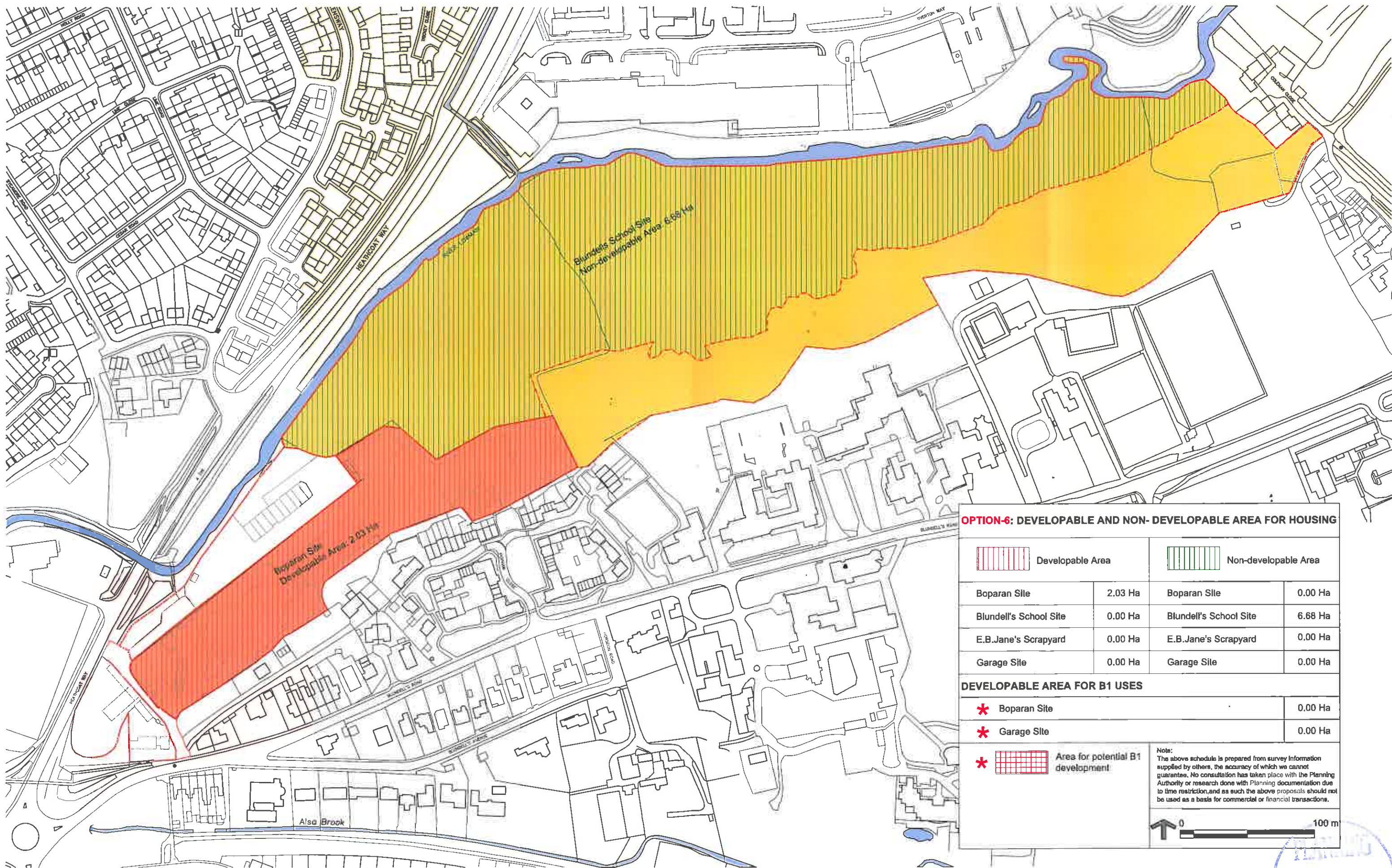
✱ Boparan Site	0.79 Ha
✱ Garage Site	0.34 Ha

✱  Area for potential B1 development	
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Notes:  
The above schedule is prepared from survey information supplied by others, the accuracy of which we cannot guarantee. No consultation has taken place with the Planning Authority or research done with Planning documentation due to time restriction, and as such the above proposals should not be used as a basis for commercial or financial transactions.







**OPTION-6: DEVELOPABLE AND NON- DEVELOPABLE AREA FOR HOUSING**



Developable Area



Non-developable Area

Boparan Site	2.03 Ha	Boparan Site	0.00 Ha
Blundell's School Site	0.00 Ha	Blundell's School Site	6.68 Ha
E.B.Jane's Scrapyard	0.00 Ha	E.B.Jane's Scrapyard	0.00 Ha
Garage Site	0.00 Ha	Garage Site	0.00 Ha

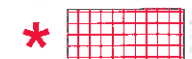
**DEVELOPABLE AREA FOR B1 USES**

\* Boparan Site

0.00 Ha

\* Garage Site

0.00 Ha

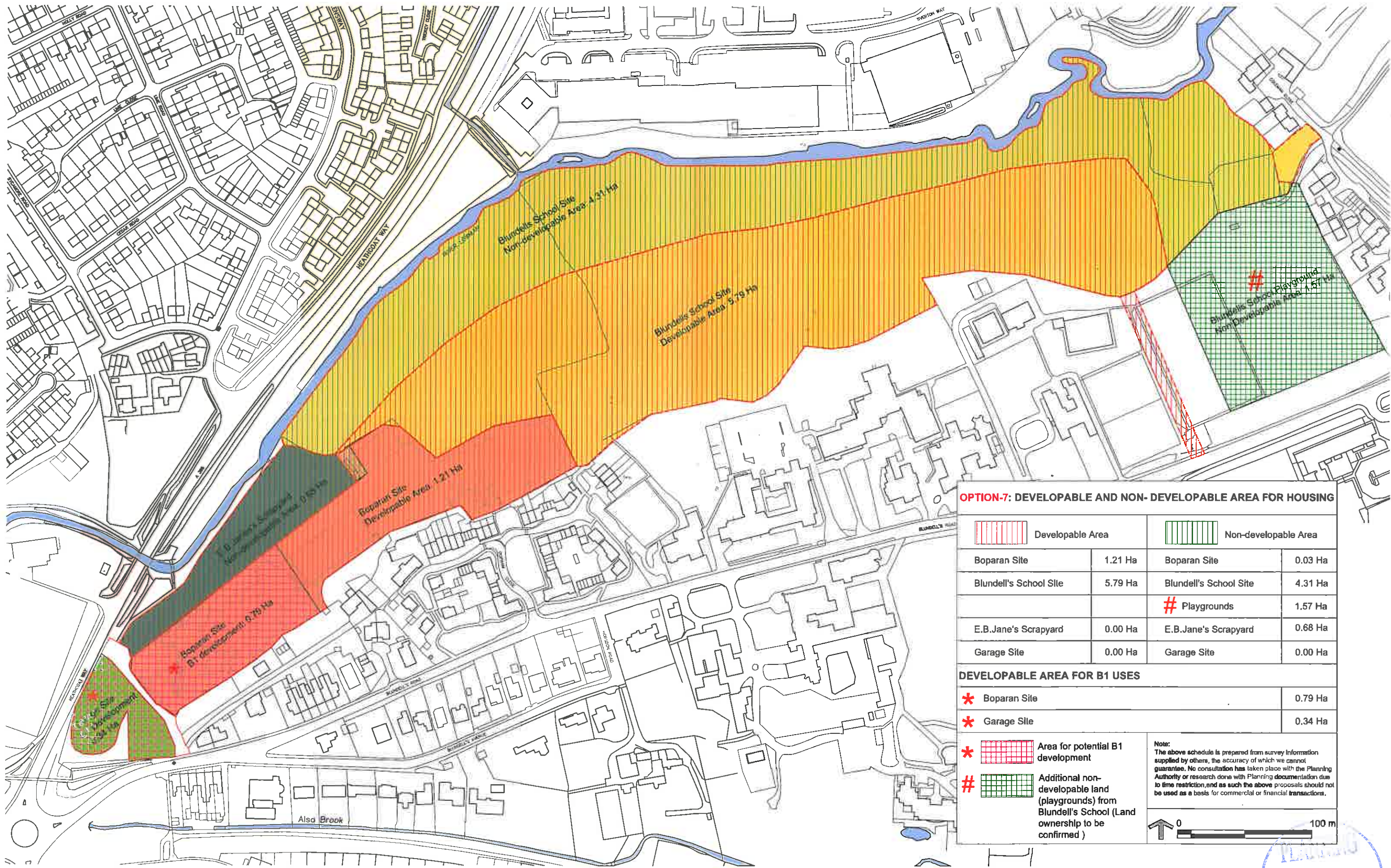


Area for potential B1 development

Note:  
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**OPTION-7: DEVELOPABLE AND NON- DEVELOPABLE AREA FOR HOUSING**

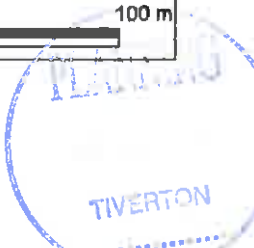
Developable Area		Non-developable Area	
Boparan Site	1.21 Ha	Boparan Site	0.03 Ha
Blundell's School Site	5.79 Ha	Blundell's School Site	4.31 Ha
		# Playgrounds	1.57 Ha
E.B.Jane's Scrapyard	0.00 Ha	E.B.Jane's Scrapyard	0.68 Ha
Garage Site	0.00 Ha	Garage Site	0.00 Ha

**DEVELOPABLE AREA FOR B1 USES**

* Boparan Site	0.79 Ha
* Garage Site	0.34 Ha

* [Red grid pattern]	Area for potential B1 development
# [Green grid pattern]	Additional non-developable land (playgrounds) from Blundell's School (Land ownership to be confirmed )

**Note:**  
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24 March 2014  
Delivered by email

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



Blundells School is allocated under Policy AL/TIV/9 in the Mid Devon Allocations and Infrastructure Development Plan Document for mixed use development. The former 2 Sisters factory site is part of this allocation and is owned by AREIL, the extent of their ownership is identified as the Boparan land on the enclosed plan.

The site is approximately two hectares in size and is currently vacant. Following the closure of the factory in 2005, the site has fallen into a state of disrepair and attracts anti-social behaviour. AREIL are reviewing options for the future redevelopment of the site and in the meantime would like to demolish the existing buildings to reduce their liability with the comfort that the principle of the redevelopment of the site is accepted by the Local Planning Authority. AREIL are, therefore, seeking to retain the allocation of the site for B1, B2 and B8 uses. AREIL do not have control over the remainder of the land and, therefore, only seek the retained allocation of this land (the land identified as the Boparan land).

Local Plan Review Policy TIV4 includes the site as an option for allocation but the supporting text suggests the site be deallocated due to: there no longer being a need for a link road to the Eastern Urban Extension; concerns about achieving adequate access; loss of employment land; and the deliverability of the scheme. These issues are addressed in turn below.

#### **Provision of link road**

The purpose of allocating the wider site (Policy AL/TIV/9) was to provide a link road to the Eastern Urban Extension which would be required should the proposed development exceed 2000 houses. The draft masterplan (2014) for the Urban Extension includes only 1500 houses so there is no longer a need for the link road and the Blundells School site is no longer required.

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The proposed allocation is for a much smaller area and the link road could not be delivered through the redevelopment of this site. Therefore, this should not prevent the allocation of the site for alternative uses compatible with the existing use of the site and in accordance with our client's proposed redevelopment of their site as set out in these representations. .

## **Loss of employment land**

The Mid Devon Strategic Housing Land Availability Assessment (2013) cited concerns about the loss of employment land as a result of the redevelopment of the former factory site. The allocation of the site for B1, B2 and B8 uses, as put forward by these representations, will address these concerns and give some certainty that the site will be retained as an employment site.

B1, B2 and B8 uses on the site will also contribute towards addressing the shortfall in employment land provision across Mid Devon identified in the Employment Land Review (2013). The allocation of the site will also contribute to the qualitative need for employment land in Tiverton to ensure that the town's self-containment is maintained and to reinforce the town's role as a key employment centre in the District (Employment Land Review 2013).

## **Highway safety**

The supporting text to draft Policy TIV4 raises concerns about whether the site can be safely accessed from Blundells Road. However, TIV4 relates to the allocation of a much wider site and the traffic movements associated with the previously proposed development would have been much greater. The accompanying highways statement demonstrates that the site subject of these representations can be adequately and safely accessed from Blundells Road utilising the existing access.

## **Deliverability**

The LPA has expressed concern about the deliverability of development on the Blundells School site due to there being a number of landowners. The 2 Sisters factory site is under the sole ownership of AREIL who are committed to redeveloping the site once a suitable solution has been identified. The development of the site is, therefore, deliverable.

## **Summary and conclusion**

These representations seek to retain the allocation of the former 2 Sisters factory site for B1, B2 and B8 uses. This will retain the site in employment uses, contributing towards the qualitative and quantitative need for employment land in Mid Devon. The site is previously developed and in an accessible location within the urban area so should be the first priority for development. The accompanying highways statement demonstrates that the site can be accessed safely and that there is sufficient capacity within the highway network to accommodate employment uses on the site. There is no reason why the allocation of the site should not be carried forward in the Local Plan Review. Crucially, the allocation of the site meets the tests of soundness (NPPF Paragraph 182).

I trust the above and enclosed are of assistance and I would be grateful if you could keep me up to date on progress with the Local Plan. In the meantime, please do not hesitate to contact me should you require any further assistance.

Yours sincerely

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Rebecca Palmer  
Senior Planner

## Supporting Document

### Mid Devon Local Plan Review Options Consultation

Site: *The Former Factory Site at Blundell's Road*

*Transport and Highway Representations*



#### 1. Introduction

The Transportation Consultancy Ltd. (ttc) has been retained by Amber Real Estates Investments Limited (AREIL) to provide transport and access advice in relation to their land interest at the former factory site at Blundell's Road, Tiverton, Devon.

This representation deal with the Local Plan Options Review for Mid Devon District Council and deals with the transport and highway issues of the former factory site at Blundell's Road, Tiverton, Devon, as they relate to the **Core Strategy**, the **Allocations and Infrastructure Development Plan Document** and **Development Management policies**.

These submissions seek to set out the suitability of the allocation of the land for a mix of B2 and B8 industrial uses in terms sustainable transport and the impact on the surrounding highway network by addressing the following key issues, namely:

- National Planning Policy in respect of Transport;
- Sustainable Access;
- Traffic Impact; and
- Means of Access.

The Supporting Document presents a conclusion by pulling together the findings from the key issues.

#### 2. Policy Background

The National Planning Policy Framework sets out the Government's planning policies for England and how they are expected to be applied. The National Planning Policy Framework (NPPF) formally published in March 2012 also outlines how planning should help achieve sustainable development.

The key core principle of the NPPF in respect of transport in the context of the appropriate allocation of land is "Promoting Sustainable Transport". The core principle states that for all planning decisions it is expected that safe and suitable access to the site can be achieved for all people. Encouragement is given to solutions which support reduction in greenhouse gas emissions and levels of traffic congestion, such as opportunities for more sustainable modes of transport.

The NPPF document states that:

*"In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport"* (ttc emphasis)



NPPF goes on to state that:

*“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore developments should be located and designed where practical to:*

- *Accommodate the efficient delivery of goods and supplies;*
- *Give priority to pedestrians and cycle movements and have access to high quality public transport facilities;*
- *Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
- *Incorporate facilities for charging plug-in and other ultra-low emission vehicles; and*
- *Consider the needs of people with disabilities by all modes of transport.”*

Finally planning policies should be aimed for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities (para 37).

### 3. Sustainable Access

#### 3.1 Site in Context

The location of the former factory site at Blundell's Road lies one kilometre to the west of Tiverton town centre. It lies in a triangle of land surrounded by the A396 Heathcoat Way to the North West, the Blundell's Road to the South and an area of open land to the North East. Access to the site for vehicles, is currently gained from Blundell's Road by way of give way priority junction. Access for both pedestrians and cyclists is also gained from the same access, namely from Blundell's Road. There is no access to the site from the A396 Heathcoat Way. The location of the site is shown in Figure 1.

**Figure 1 – Location of the Former Factory Site at Blundell's Road**





Blundell's Road is an 8 metre wide urban single carriageway road linking the town centre with the rural hinterland to the east of Tiverton. The road has a pelican pedestrian crossing facility 10 metre to the west of the site entrance, allowing pedestrians to cross Blundell's Road safely. In addition there are bus stops 20 metres to the east of site entrance allowing good public transport access for the surrounding residential area.

The A396 Heathcoat Way is a 7.3 metre wide single carriageway road which is subject to a 40 mph speed limit. The road links the town centre with the A361 trunk road and offers a good route to the wider strategic highway network, should the site be selected for industrial use.

The site is currently occupied by a number of vacant buildings.

### 3.2 Walking and Cycling

Walking and cycling are two modes of transport which not only provide benefits to the user, but help to reduce the amount of congestion and pollution within the area. The IHT publication "Guidelines for providing for Journeys on Foot" provides advice on acceptable walking distances to facilities and generally accepted as a 2km maximum a 30 minute walk; whilst distances of up to 5km for regular journeys and 8km for commuting journeys is considered appropriate for cyclist (source: LTN 2/08 – Cycle Infrastructure Design).

As already indicated pedestrian access to the site is currently from Blundell's Road which benefits from a good footpath provision on both sides of the road and provides good pedestrian access to the site for the residential areas to the west. In addition there is pedestrian crossing facility in the form of a pelican crossing at the site access, which links a footpath serving the residential areas of south Tiverton with Blundell's Road.

There is also a dedicated pedestrian route, in parts traffic free, from the site entrance to the centre of Tiverton. The route cross the A396 via a pedestrian over bridge and then continues via Blundell's Road to the commercial areas of Tiverton some 1 kilometres to the west of the site.

As indicated in Annex 1, there is an on-road cycle route along the front of the proposed industrial site, which links to a number of cycle routes offering permeability into Tiverton and the surrounding areas. As can be seen the cycle routes offer easy and sustainable access to all parts of Tiverton all within a 2 kilometre radius of the site.

National Cycle Network route 3 (West Country Way) passes in front of the proposed location of the industrial development which provides cycle access to Tiverton Parkway and Taunton to the East and Kingshayes and Bampton to the North.

From an employment perspective there are several large residential areas within an acceptable walking distance from the site from which employees could be recruited. The residential areas, together with the commercial centre of Tiverton and the bus station are all within a 10 minute cycle ride (Annex 1). In addition a two minute walk along the footpaths on either side of Blundell's Road reaches the nearest bus stops.

### 3.3 Public Transport – Bus

The nearest bus stops in proximity to the proposed site are located on Blundell's Road approximately 50m from the industrial site entrance. This is well within the desirable walking distance suggested in 'Guidelines for Providing for Journeys on Foot' (400m).



The bus stop on the westbound approach to Tiverton consists of a lay-by and an unattractive shelter, whilst on the eastbound approach from Tiverton there are no facilities. The bus stops are served by Stagecoach service no. 1, which provide a regular 20 minutes service throughout the day linking Tiverton Town Centre (bus station) with Tiverton Parkway and Exeter.

As can be seen there are good bus transport options available for the employees and visitors of the proposed industrial development for destinations which they view as beyond a reasonable walk or cycle distance. The site is well served by a regular bus service: whereby various other bus services can be accessed via Tiverton Bus Station in the town centre.

### 3.4 Public Transport – Rail

The closest rail station to the proposed industrial development site is Tiverton Parkway which is located approximately 8km as the “crow flies” or 9 km via the A361 from the site. Tiverton Parkway is served by a number of regional and national services offering a frequent and reliable service to Taunton and the North and East, and Exeter and the South West.

Bus service no 1 links Tiverton Parkway with Tiverton town centre offering a 20 minute frequency throughout the day and stops at the bus stops on Blundell’s Road adjacent to the proposed industrial site.

### 3.5 Accessibility Conclusions

There are a number of large residential areas within 2km of the development site. Pedestrian and cycling facilities in the locality are very good with long sections of pedestrian/cycleway routes and safe crossing facilities at major junctions and across principal routes. There is a regular and frequent bus services adjacent to the site that runs along Blundell’s Road whilst rail services are within 8km of the site, provide sustainable access to other locations in the region.

The proposed development benefits from a good level of accessibility, for both employees and visitors via a range of sustainable transport modes. It is considered that the development complies with current Government sustainable development guidance and local planning policy aspirations for minimising the need to travel and minimising the impact of travel.

## 4. Traffic Impact

### 4.1 Traffic Generated by the Proposed Development

In order to ascertain the level of trip activity generated by the proposals, trip rates have been determined and based upon rates from the industry standard TRICS database. Sites were selected from the TRICS (2013 v7.1.1) database using the land use category “Employment – Industrial Estate” - B1/B2 uses.

Table 1 sets out the trip generation rates as obtained from the TRICS database and detailed above.



**Table 1 – Trip Generation Rates**

Time Period	Employment – Industrial Estate (All Vehs)		Employment – Industrial Estate (OGV's)	
	Arrive (per 100 sqm)	Depart (per 100 sqm)	Arrive (per 100 sqm)	Depart (per 100 sqm)
AM peak hour (8-9)	0.446	0.210	0.020	0.020
PM peak hour (4-5)	0.207	0.435	0.017	0.012

Source: TRICS

Based upon AREIL's experience from developing similar sites across the UK a 2 hectare site equates to a industrial unit consisting of a 5,000 sq. m gross floor area footprint. Based upon the trip generation rates set out in Table 1 and a scenario of a new 5,000 sq. m. GFA, the forecast trips generated by the proposed development is summarised in Table 2.

**Table 2 – Trip Generation (Vehs/hour)**

Time Period	Proposed Industrial Estate		
	Arrive	Depart	Total
AM peak hour (8-9)	23	11	34
PM peak hour (4-5)	11	22	33

Source: ttc

From Table 2 it can be observed that in a worst case scenario there would be little impact on the surrounding highway network as a result of the proposed B2/B8 industrial development. The site access would experience a worst case increase in AM peak hour traffic of 34 vehicles, which relates to one vehicle every two minute. During the PM peak hour a worst case increase of 33 vehicles would be experienced, which again equates to one vehicle every two minutes. In both cases the worst case increase will not exceed 5% of existing traffic flows on the local highway network and put into context this is well within the variation of the daily traffic flows and the effects of the proposed development will not be significant.

In order to determine if the increase in traffic, as a result of the development, on the surrounding network is significant, reference should be made to the DfT's current "Guidance on Transport Assessment" (2007). One measure of material impact on the highway network referred to "would be a worsening of congestion". Further reference is given within the document and indicates that thresholds based upon a development generating over 30 two way peak hour vehicle trips a useful point of reference from which to start from.

Given that the site is to be developed for employment uses OGV trip generation figures have also been obtained from the TRICS database for both the morning and evening peak periods. Table 3 identifies the OGV traffic associated for the B2/B8 industrial development site, which can be seen as minimal, one every 30 minutes during the peak hours.

**Table 3 – Trip Generation (OGV's/hour)**

Time Period	Proposed Industrial Estate		
	Arrive	Depart	Total
AM peak hour (8-9)	1	1	2
PM peak hour (4-5)	1	1	2

Source: TRICS



As part of any planning application involving the scale of development proposed, a Workplace Travel Plan will be required which will encompass a package of measures aimed at encouraging employees and visitors of the proposed industrial development to travel by sustainable modes.

## 4.2 Conclusions

In conclusion the traffic impact assessment clearly demonstrates that a development consisting of a mix of B2/B8 uses at the former factory site at Blundell's Road, will not materially affect the level of service currently afforded by the surrounding highway network.

## 5. Site Access

The site currently lies in between the A396 and Blundell's Way with a current access provision to the wider highway network off Blundell's Way via a simple priority junction as illustrated in Figure 2.

In order to allow for an appropriate and safe means of access for trips associated with any proposed development on the site, a number of access scenarios have been developed. A feasibility study of site access options has indicated that the following functional forms of access could be achieved to provide a safe and suitable means of access, namely:

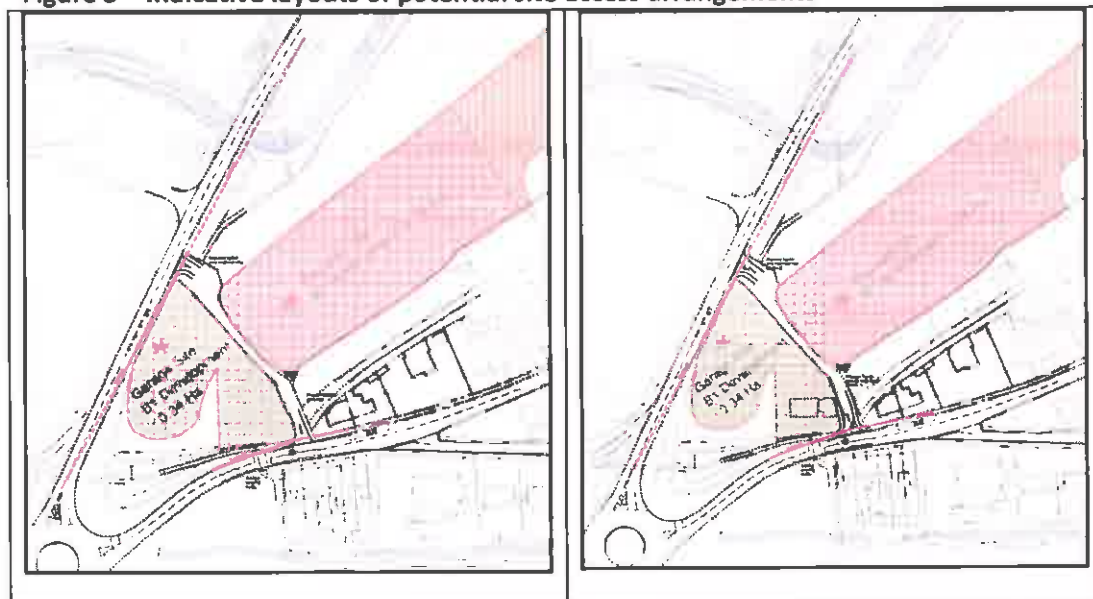
- Improvement to the existing simple priority junction at the junction with Blundell's Road;
- Access only into the access road from Blundell's Way, together with an out only onto Heathcoat Way; and
- A simple priority junction with Heathcoat Way.



Figure 2 – Existing Site Access

The indicative layouts of the potential forms of accesses to the site are given in Figure 3 and in detail in Annex 2.

Figure 3 – Indicative layouts of potential site access arrangements



Source:ttc



Given the extremely low nature of the trips associated with the proposed B2/B8 industrial development all the forms of access will have sufficient capacity to handle the additional trips generated by the development.

## 6. Summary and Conclusions

The Transportation Consultancy Ltd. (ttc) has been retained by Amber Real Estates Investments Limited (AREIL) to provide transport and access advice in relation to their land interest at the former factory site at Blundell's Road, Tiverton, Devon.

This representation deal with the Local Plan Options Review for Mid Devon District Council and deals with the transport and highway issues of the former factory site, Blundell's Road, as they relate to the Core Strategy, the Allocations and Infrastructure Development Plan Document and Development Management policies.

There are a number of large residential areas within 2km of the development site. Pedestrian and cycling facilities in the locality are very good with long sections of pedestrian/cycleway routes and safe crossing facilities at major junctions and across principal routes. There is a regular and frequent bus services adjacent to the site that runs along Blundell's Road whilst rail services are within 8km of the site, provide sustainable access to other locations in the region.

The proposed development benefits from a good level of accessibility, for both employees and visitors via a range of sustainable transport modes. It is considered that the development complies with current Government sustainable development guidance and local planning policy aspirations for minimising the need to travel and minimising the impact of travel.

The traffic impact assessment clearly demonstrates that a development consisting of a mix of B2/B8 uses at the former factory site, will not materially affect the level of service currently afforded by the surrounding highway network.

A number of feasible access arrangements have been developed which demonstrate that a safe and suitable means of access to the potential development site can be achieved.

In conclusion and in the light of the above it is clear that the traffic impacts, resulting from a proposed B2/B8 industrial development in this location, have an insignificant impact on the local transport network within Tiverton.

The development site is accessible by a choice of modes and complies with Government sustainable development policies as set out in Table 4 and that there are no transport reasons why the former factory site at Blundell's Road, Tiverton should not be included within the Mid Devon Local Plan.



**Table 4 – Compliance Table with Government Policies**

National Policy Planning Framework – Para 35	
• Accommodate the efficient delivery of goods and supplies	YES – a safe and suitable access can be achieved
• Give priority to pedestrians and cycle movements and have access to high quality public transport facilities	YES – high quality cycle and pedestrian linkages with a frequent bus services
• Create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones	YES – can be achieved through the design process and the design process
• Incorporate facilities for charging plug-in and other ultra-low emission vehicles	YES – can be achieved through planning conditions
• Consider the needs of people with disabilities by all modes of transport	YES – can be achieved through the design process

Alan Bailes TPP, MSc, FCIHT, FCILT  
The Transportation Consultancy  
21<sup>st</sup> March 2014







## Annex 2

