

The Chairman of Halberton Parish Council, Ian Batchelor, apologises for his absence due to unavoidable circumstances and, the Parish Council has subsequently nominated Nick Govier to speak on their behalf.

In its submission to the planning appeal, the Parish Council had three objectives:

- 1) To bring both the Parish Council and the residents view of the impacts on this locality
- 2) Illustrate how this application falls short in complying with the policies contained in the Mid Devon Local Plan 2013-2033
- 3) Seek involvement of our Parish Council Chair and local residents in the planned appeal hearing due to commence in early September

And thus, the Parish Council is very grateful to the Inspector for allowing us to speak today realizing objective 3.

We believe our submitted document illustrates how this application falls short of the policies in the Mid Devon Local Plan realising objective 2 which includes S1, S9, S9, DM1, DM3, DM4 and DM25. Our reasons are contained in the original submission and what I share today is in addition to the comments we have already submitted on this application and the information submitted to this appeal.

So today we will focus on local knowledge being aware that the Inspector has still to visit the site in question, and our reasons to challenge the proposed development in this location.

Halberton is a largely rural parish and the Parish Council has been active in supporting applications that bring housing and, in particular, affordable housing to the locality within the curtilage of the existing village.

The Parish Council believes the health, welfare and safety of its residents is of paramount importance. The traffic committee works tirelessly to improve the road traffic situation and this area will become under immense pressure due to a number of contributory factors which have not been taken into account.

The strategic intent of the Tiverton EUE was to reduce traffic volumes in the surrounding parishes including Halberton, Sampford Peverell and Willand. This development fails to consider the significant impact on the locality from the proposed level of traffic volumes at a time when other significant proposals are being considered. It would be a fundamental failing for these parties to be making decisions in isolation without considering the scale of aggregated impact and the detrimental impact on the local area.

The Inspector should be aware that the new westbound A361 junction remains unopen due to lack of safety assessments and the eastbound A361 junction is 'on hold for the foreseeable future' and this route is the main diversion route for when the A361 is closed.

In reviewing this application we are mindful this site lies directly on a 40mph road deemed in a previous appeal to be too dangerous for the location of three holiday cottages. It feels incomprehensible it is now deemed safe to allow a development of this scale.

At the same time it is proposed children from this development would attend Halberton or Tidcombe Primary School. The Inspectorate should be made aware that there is no road

infrastructure to allow children to walk safely to school. Both routes involve walking on roads/narrow lanes where there is no provision of pavements and, in certain areas, no room for a pavement and no street lighting. Yet both schools are, according to DCC policy, within a walkable distance. We consider this incomprehensible.

Public transport is not immediately available at the site and to travel to Halberton would mean crossing this dangerous road to catch a bus if one was available at the appropriate time.

So residents will have to take to their cars to travel the short distance to Halberton or Tidcombe primary school. Does this meet with the Government's objective of carbon zero – potentially 300 cars pulling out onto a dangerous road when it is at its most busiest?

Thus in planning terms:

The material planning considerations - including highway safety, highway capacity, and absolutely sustainability (in particular reliance on the private car due to distance/lack of ease to walk/cycle to facilities, work etc) - are all relevant when making a planning assessment. If the location means the development is not 'sustainable' then, unless the housing supply figure is significantly below MDDC's requirements, then this development could be refused.

Further, we believe that Hartnoll Farm is outside the area defined by MDDC for residential development given that it is in open countryside and defines the boundary between Tiverton and Halberton.

And having considered the impacts of traffic volumes, traffic risks and impact on the local residents from the cumulative traffic risks we must consider the health and welfare of the residents of this proposed estate and we can do this based on the experiences of the residents of Halberton who live in close proximity and indeed in many cases live further away from the AD plant than the potential residents of the new site.

In doing so I am mindful of the earlier comments from Mr Williams in his opening remarks and how this new development will be supported through the applicants own AD plant and help deliver a sustainable model.

Before I share the experiences of existing residents it raises a number of immediate questions:

1) In supplying a development of this scale what is the scale of impact on the production requirements for the AD plant and how does this comply with the existing planning conditions in place. These same conditions were fought for and insisted on as part of the original AD proposal and are in place to protect the environment for the local communities of Halberton, Sampford Peverell, Willand and Tiverton. With outputs limited are they recommending a breach of existing planning conditions to make their case for a sustainable model

2) In supplying a development of this scale what is the scale of additional feedstock that is required and the additional traffic impacts in the same locality. At the same time how does this comply with the existing planning conditions in place that limits the feedstock supply from specific locations

And what of the area surrounding the proposed development. Other residents who live in close proximity to the site are concerned by:

Noise:

Local residents tell us that the noise can be intolerable and they have to close their windows and we await a full noise assessment report which has the full back of the local public health officer and should measure the operation against the previously agreed noise conditions which by their levels are already generous given the plants rural, not residential, location. To consider new residential properties in close proximity feels a future public health risk to home owners.

The noise is further impacted by the a livestock feed pelleting enterprise and a local resident wrote: "This business emits loud noise and large amounts of dust. Straw is being chopped up with a stump grinder. Dust is blown over the lane, onto the canal and over our houses. The dust is like minute pieces of straw and coats everything, bins, windows, garden furniture etc. and it surely must get into our lungs."

Air quality:

As detailed in the paragraph above, a considerable amount of dust can be found in the air – not just dust from adjacent farming and commercial activities but also from a constant stream of agricultural vehicles laden with crops destined for the AD plant. Bringing with them carbon emissions which we know can be so dangerous to health.

It is highly evident from feedback seen from public health officers on AD plants around the county that unpleasant odour and the risk of emission of gases can reach receptors up to 400m away. And again, to consider residential properties well within this proximity where significant public concern is already being raised feels incomprehensible.

We recognise the discussion between the appellant and MDDC over the provision of the 5 year land supply but appreciate the opportunity to represent the Halberton Parish. We are deeply concerned with this application and hope the comments shared illustrate these concerns. To summarise:

- the highways infrastructure is inadequate and fails to consider the cumulative impact of what is being proposed in the locality
- the provision of schooling and the risks associated to align with the policies outlined by the DCC fall short when we consider the pedestrian risks in this area
- the lack of adherence to the Mid Devon Local Plan as outlined in our original submission and in particular the material adverse impact on the rural countryside including the GWC which is a Country Park and core to the tourism strategy for Mid Devon
- the experiences from existing residents in Halberton and how this development will provide housing in closer proximity
- and finally how the assumptions to deliver a sustainable model require an ongoing acceptance of the need, in all likelihood, to not adhere to existing planning conditions agreed as recently as December 2022