

Cllr Alan Connett
Submission of Objection
Application 16/03251/MAJ West Exe Park, Peamore

Introduction

I write to object to the proposal contained in the above application, for the development of 33 acres of countryside at Peamore for the creation of an industrial park.

The Teignbridge Local Plan 2013-2033 was subject to independent Examination by the Inspector during September 2013 and formally adopted by Teignbridge District Council on 06 May 2014.

The planning context for this objection is further supported by the Exminster Neighbourhood Development Plan, adopted in March 2015.

Sustainability

Policy S1a – The proposal fails in that it is not sustainable. Accessibility by walking, cycling and public transport is demonstrably poor.

S1d – Negative impact on health, safety and environmental effects of noise, smell, dust, light, vibration, fumes or other forms of pollution or nuisance arising from the proposed development, including from associated traffic;

S1e - Impact on the residential amenity of existing and committed dwellings, particularly privacy, security, outlook and natural light;

S3 Land for Business, General Industry and Storage and Distribution

Teignbridge Council, under this policy, has committed itself to bring forward 3 hectares of employment land a year, with a 5 year supply available for development – 15 hectares.

There already exists at Peamore, a planning consent for 5 hectares, but the applicants have stated, and Teignbridge's own Economy Manager suggests, the site is not viable to bring forward due to costs related to access and utility provision.

The reason, they suggest, for seeking this new consent for an additional 33 acres, is to make the whole development viable.

If the original 5 hectare site and consent was not viable, why did the applicants apply and why did Teignbridge District Council give consent?

I have not seen evidence on the council's planning portal to show that the new application is viable and will be delivered?

I question the sweeping aside of the provisions of the Local Plan (the new application site is outside the Plan) simply to compensate in this case, for the developer's inability or unwillingness to bring forward an existing consent

The council would appear to need to focus on bringing forward existing planning consents it has given elsewhere in the district for industrial/employment land in preference to subverting its own Local Plan.

S9 Sustainable Transport

The application fails to meet the Sustainable Transport test of the Local Plan in that it does not promote public transport, cycling and walking as transport modes of choice or minimise dependence on cars;

S21 Villages

Both Exminster and Kennford are included within Policy S2. The Policy says these defined villages will be appropriate locations for limited development which meets their social and economic needs, protects their rural character and is consistent with the need to minimise travel.

This application fails to protect rural character and is far in excess of what can be described as 'limited development' to meet the two communities social and economic needs. No evidence has been provided that it will minimise travel.

S22 Countryside

The application fails to demonstrate how it meets the policy requirements set out by the Council as:

"In assessing development proposals, particular account will be taken of:

f) the distinctive characteristics and qualities of the Landscape Character Area;

g) the integrity of green infrastructure and biodiversity networks ;

h) impact on overall travel patterns arising from the scale and type of development proposed"

EC1 Business Development

The application is contrary to Policy EC1 in that it is outside defined settlement limits: “To support additional job creation in settlements, office, general industrial and storage and distribution developments will be acceptable in principle within defined settlement limits. This includes new buildings, extensions to existing buildings and changes of use or conversions of existing buildings.”

EC3 Rural Employment

This Policy permits, in general principle, the expansion of existing uses in open countryside, provided that:

- f) the scale of employment is appropriate to the accessibility of the site by public transport, cycling and walking and the standard of highways, and would improve the balance of jobs to working age population within the immediate vicinity;
- g) proposals respect the character and qualities of the landscape and the setting of any affected settlement or protected landscape and include effective mitigation measures to avoid adverse effects or minimise them to acceptable levels;
- h) changes to an existing building of historic interest or character sensitively retain its interest, character and appearance;

I submit the application fails to meet these requirements in that the site is poorly served by public transport and has no safe walking or cycling routes.

The proposal does not respect the character and qualities of the landscape nor the setting of the affected settlements.

EN1 Strategic Open Breaks

“To maintain the physical separation of certain settlements, development within the following open breaks will be limited to that which retains their open character and their contribution to the settlements’ setting:

Newton Abbot – Kingskerswell – Abbotskerswell – Torbay

Newton Abbot - Kingsteignton

Exeter – Exminster

Development proposals on open breaks will be subject to policy S22 **and in addition will not be permitted if they result in:**

- a) harm to the openness or landscape character of the area, including local views or would otherwise result in significant harm to settlements in their wider landscape setting, or
- b) loss of environmental or historical assets that individually or collectively contribute to local identity.

The application is a significant breach of Policy EN1 as described above, in that the application is harmful to the openness and landscape character, including local views and would create significant harm to the settlements of both Exminster and Kennford in their wider landscape setting.

Please also refer to para 5.1 of this policy which further supports this objection. It says:

“Certain settlements are close together, and there is pressure to develop within the gaps. Where these gaps are important to their character or are themselves of high environmental quality, the policy indicates that this open character should be maintained”.

The gap between Exminster and Kennford is important to the character of both settlements and communities. It is open countryside.

EN2A Landscape Protection and Enhancement

The application FAILS the four tests of this policy as set out below:

- a) conserve and enhance the qualities, character and distinctiveness of the locality;
- b) where appropriate restore positive landscape and seascape character and quality;
- c) protect specific landscape and seascape, wildlife and historic features which contribute to local character and quality; and
- d) maintain landscape and seascape quality and minimise adverse visual impacts through high quality building and landscape and seascape design.

Para 5.5 further states: “The landscape and seascape of the district will be protected for its intrinsic character and beauty, for its natural, historic and cultural interest and for its benefits to thriving agriculture, tourism and rural communities.

Para 5.7 also states: “A high level of protection will be afforded to Areas of Great Landscape Value which are indicated on the Policies Map reflecting their locally recognised high scenic quality and sensitivity...”

SWE1 South West of Exeter Urban Extension

Under this policy, relating to the housing development, it is recognised that the A379 requires improvements. The A379 also serves the close by Peamore site which is the subject of this application:

Para 10.11 of the Local Plan reads “Improvements to the A379 are necessary to avoid this road becoming a barrier which could divide and prevent a well-connected and sustainable place. It will be necessary to change the nature of the road so that it can begin to integrate with and become a functioning part of the development. The road will need to respond to its new environment and role within the city whilst also maintaining its current function and capacity. Changes to the nature of this road could include, for example, speed reductions, providing pedestrian crossings at key points, consideration of a footbridge”

It is premature to consider the West Exe Park application before the required A379 improvements have been put in place.

SWE2 Employment adjacent to Peamore

Teignbridge Council's Local Plan states, in relation to SWE2 and the allocation of approximately 5 hectares adjacent to Peamore for employment land:

Local Plan para "10.25 Whilst there will be some localised employment within the community hubs, the main allocation will be adjacent to an existing employment area situated outside the masterplan area which could be delivered independently. This will facilitate growth in the existing businesses and the potential for other appropriate uses. It is not intended to compete with other areas in and around Exeter and is considered an appropriate location.

It has the opportunity to be one of the key arrival points and should be designed appropriately to respond to its environment.

10.26 Due to the proximity to the M5/A38 junctions it is essential that development of this site does not create a conflict with the function of those roads, particularly in relation to any new access into the site from the A379.

These proposals will compete with other areas in and around Exeter. The design of the site fails to respond both to its environment and does not respect its potential role as a key arrival point. In short, this application reflects the same type of design that can be seen at many key junctions for most communities close to an arterial route.

It is not a distinctive development worthy of the location.

It is particularly pointed out that traffic is already affected in joining the A379 from the A38 at peak times. The proposed access to the site will further exacerbate problems and lead to more stationary traffic backing up onto the A38.

The Exminster Neighbourhood Development Plan also states:

Policy EXM2 - Open Countryside:

"The siting, scale, form, layout, design, materials and landscaping of any development, which may be permitted within the areas of Exminster Parish, outside the Settlement Limits as defined for Exminster village and the South West of Exeter urban extension (the Matford settlement) within the Teignbridge Local Plan, should pay particular respect to the need to protect the rural nature, existing visual landscape quality, wildlife and heritage value of the open countryside of the parish.

Any development should also respect the important contribution the open countryside makes to the setting and visual quality of the settlements within those boundaries.

Development should not erode the physical and visual separation between, and distinctive identities of those individual settlements.”

General Observations to support the Objection:

1. Highways England note the applicant has used traffic data from 2001, 16 years old, to model its traffic assessment reports. This suggests any highways assessment will at best be out of date and unhelpful in mitigating the impact of the development were it to proceed.
2. The application fails to take account of the likely routes drivers will take to reach the new site. For example, if travelling from a community along the estuary/A379 such as Dawlish, the easiest route is through Exminster and Day's Pottles Lane, a country lane which already has significant traffic management issues.
3. It is considered highly likely that Kennford will become the preferred route of choice by drivers wishing to access the development, were consent granted, because of traffic hold-ups on the A38/A380.

Example 1: Traffic already queues off the A38 onto the A379 in the mornings. Drivers heading south will come off at 'Gissons' and divert through the village to access the site. This will be easier/quicker than going across the over-bridge to rejoin the A38 north and onto the A379.

Example 2: Traffic heading south for the site, will divert off through Kennford to avoid queuing traffic on the A38. Traffic already queues despite the recent widening. This is known fact and visible.

Example 3: Traffic leaving the site would be expected to take the first on slip to the A38....but if drivers see slow moving traffic at peak times, will no doubt divert through Kennford to reach the over bridge to then head north, or cut through Kenn Lane, for example, to reach the A379 near Kenton, depending on their route.

Example 4: Staff based at the new site, and delivery drivers, will use local roads and lanes as short cuts. This is particularly so for Day's Pottles Lane which is a 'close feed' to the new site. Day's Pottles Lane is not suitable for anything more than its own residential traffic.

The development application shows no understanding of the impact on the local communities and no provision is made to mitigate local traffic issues, nor prevent any new traffic generated as a result of the development from adding to the existing and known problems.

In Kennford, the village has areas where there are no pavements. It is not possible to walk to the primary school on a pavement. Children, escorted or otherwise, have to walk in the road and the road through the village is very busy. We are very seriously concerned by the safety risks posed as a result of the application.

4. The applicant and Teignbridge Council refer to the opportunity of a new slip road to the A38 and the retention of land for this purpose. However, there is no guarantee the slip road will be provided.
The slip road would be an essential requirement were consent to be given to mitigate the traffic impacts both of this site and to assist in managing traffic from the nearby marsh Barton and Matford industrial/commercial parks and the growth of traffic arising from the South West Exeter developments.
5. The site is considered an Area of Great Landscape Value. It should be afforded the fullest protection as set out the Teignbridge Local Plan. It is a strategic break both between Exeter and Exminster and Exminster and Kennford.
6. The 'old' bridge in Kennford village is listed and we are greatly concerned about the impact of additional heavy traffic on the structure.

11 April 2017