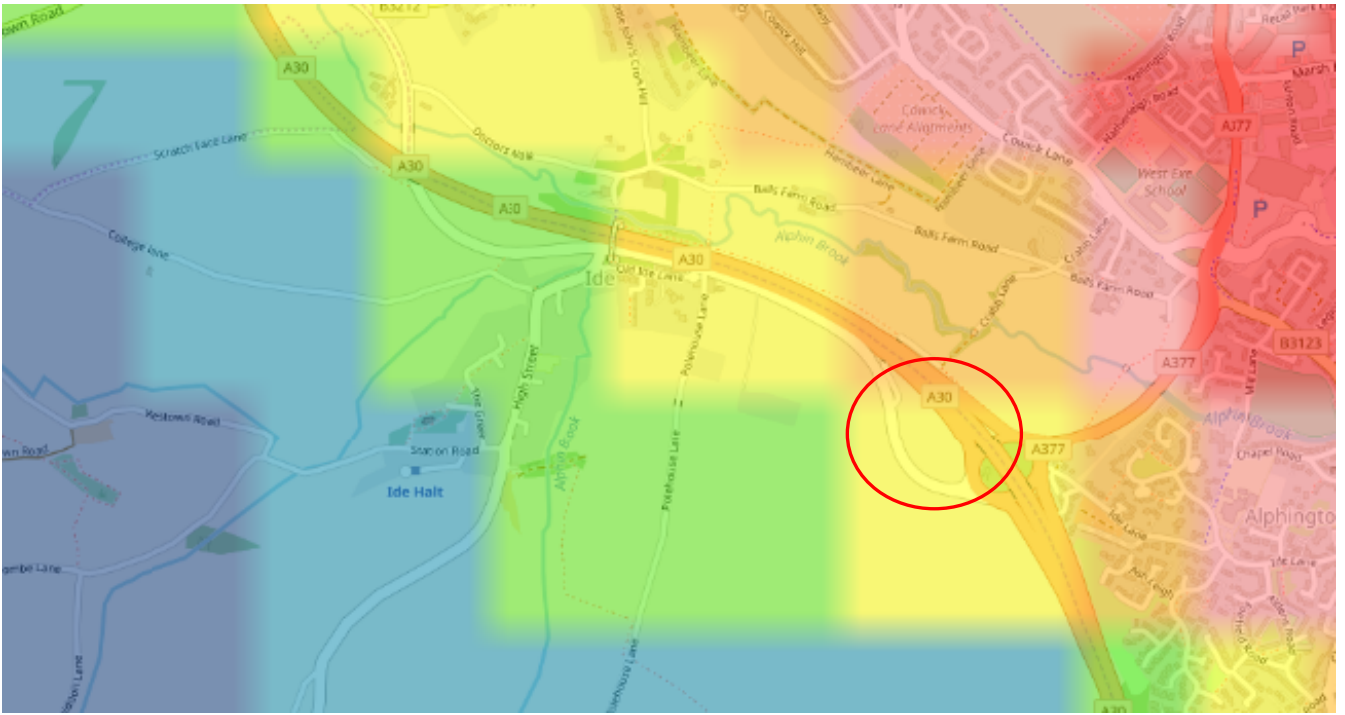


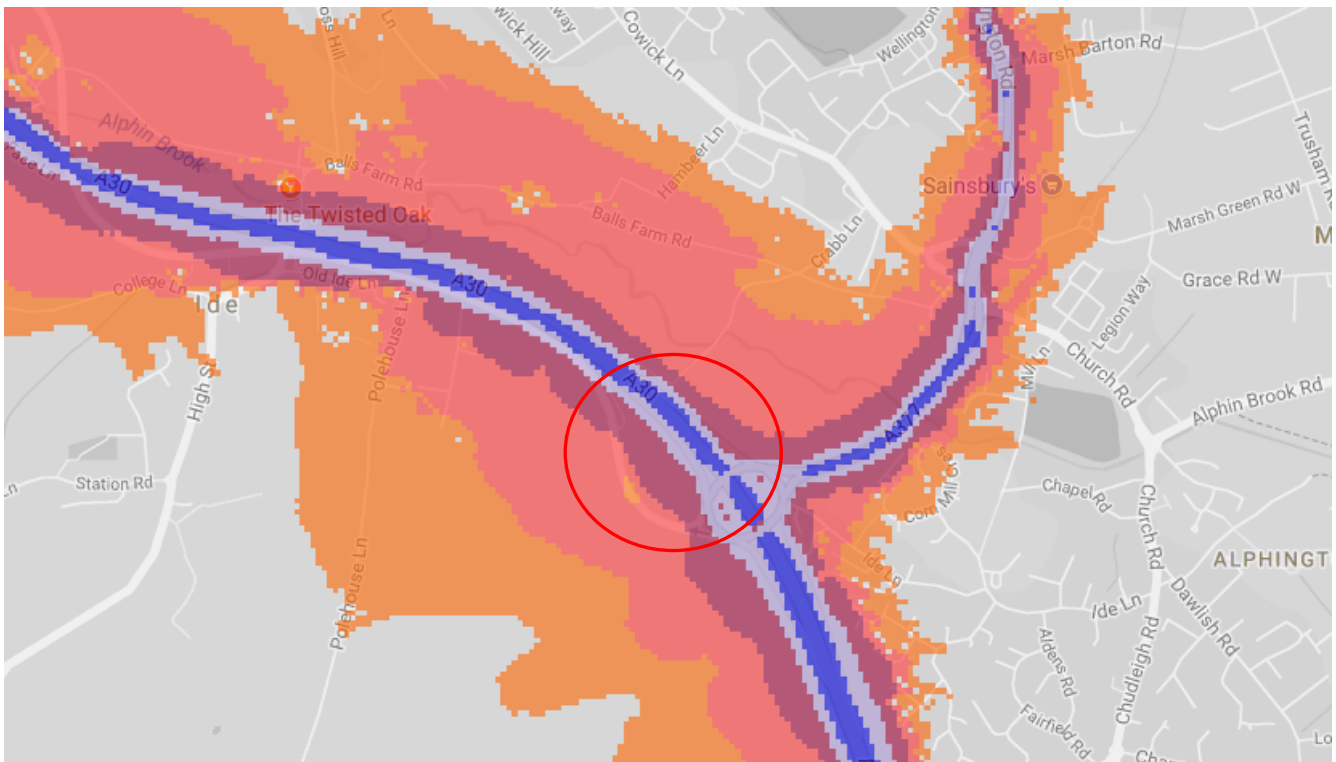
**Teignbridge District Council Formal Comments of Objection to the  
Submitted Ide Neighbourhood Plan (2016-2033)**

- 1 The comments below identify Teignbridge District Council's formal objection to policy IDE07: Ide Gateway Enhancement Area of the submitted Ide Neighbourhood Plan.
- 2 The District Council acknowledges that the area known as Roundfield has been removed from Policy IDE06: Local Green Spaces following comments from the Council at pre-submission stage, and no longer objects to this policy in its re-written form.
- 3 **Policy IDE07: Ide Gateway Enhancement Area**
  - 3.1 Policy IDE07 seeks to preserve and enhance the rural character of the village entrance and approaches to the village along the C50. The District Council support this policy approach however the extent of the enhancement area as illustrated through Map 6 is considered too extensive and includes an area of land which does not fulfil the purpose of the policy.
  - 3.2 The farthest south eastern entrance to the enhancement area includes an area of land, namely Roundfield. The area of land is encircled by the A30, C50, Crabb Lane and the Alphington Roundabout. The road encirclement provides a character heavily dominated by transport infrastructure, which is a departure from the sense of rurality being used to define the enhancement area.
  - 3.3 It is refuted by the Council that Roundfield is characterised by aspects of rurality, as stated by Ide NDP Committee in response to the District Council's comments on the Pre-submission Ide Neighbourhood Plan. The site is encircled by road and has higher than average levels of light pollution (Figure 3.3.0) due to its proximity to Exeter and noise pollution (Figure 3.3.1) due to its immediate proximity to the busy A30 dual carriageway.



**Figure 3.3.0 – Light Pollution map indicating levels of light affecting the Roundfield site (circled), indicating moderate to high levels of light pollution**

*(Source: CPRE, 2018)*



**Figure 3.3.1 – Road Noise at Roundfield Site (circled), indicating that the majority of the site suffers above-average noise levels of 65.0-69.9dB.**

*(Source: Extrium, 2018)*

3.4 This view is supported further still by *Ide Character Assessment Report, 29<sup>th</sup> June 2017*, which seeks to provide the justifying evidence for Roundfield's inclusion in the Enhancement area, which states negative attributes of the points referenced "1" and "2" (both of which relate on the map provided to Roundfield) as follows:

- *"Traffic congestion, with occasional gridlock at peak times*
- *Traffic noise most times of the day*
- *Unauthorised advertising signs*
- *Crabb Lane and the entrance to Round Field often populated with parked cars and commercial vehicles, many left for the duration of the day, sometimes overnight".*

3.4.1 Additionally, the *Character Assessment Report* states that the A30 "is always busy and pedestrians on Ide Village Road are always aware of its presence, day or evening, because of the noise" (p.8).

3.6 Teignbridge District Council previously provided an evaluation of the sites landscape value when commenting on the Park & Ride proposal by Devon County Council and stated:

*"It is not, of itself, however an area of high landscape value..."* (Teignbridge Consultee comments on application DCC/3846/2016, 5<sup>th</sup> May 2016)

3.7 In addition no explanation is provided as to why this site is considered to hold particular local significance for its beauty above other sites also within the AGLV. Sufficient evidence has not been presented which justifies why this site within the AGLV is considered of such importance to confer very restrictive controls which should endure beyond the plan period.

3.7.1 The District Council Landscape officer has also reviewed the site for its landscape attributes and stated:

*"In summary, I am of the opinion that the site has a character that is dominated by a highways style character that has little to do with the rural character of the area. The field and its setting are in poor condition. The A30 dominates the field and significantly erodes any sense of tranquillity. In terms of visual amenity, there are no public views from the field. There are glimpses of views to Exeter and Alphington from the southern end of the field, however these views are from private land. The site is relatively well screened and does not contribute to the visual amenity of the area. In conclusion, I do not think that the site is one that contributes positively to the landscape*

*character or visual amenity of the area and is a piece of land that is difficult to consider as being beautiful.”*

- 3.8 Overall the sense of rurality sought to be preserved is primarily facilitated by well-kept verges and banks, dense tree and hedgerow screening along the C50 (Ide Village Road).
- 3.9 The justification for the Roundfield inclusion within the enhancement area identifies the “visually attractive verges and foliage of shrubs and trees”, ‘verdant embankments’ and ‘well-maintained verge’. All of these attributes denoted as ‘positives’ can be retained through development which has regard to surrounding hedgerows, embankments and verges.
- 3.10 The Character Assessment Report states that “the mature planting that now exists alongside Ide Village Road and the A30 is successful in protecting Ide Village from much of the noise and light pollution”. It is the Council’s intention that this planting would be protected in any arising scheme.
- 3.11 As can be seen from Figures 3.3.0 and 3.3.1 this area itself is already highly affected by both light and noise pollution and safeguarding the site for its current use will not improve this situation.
- 3.12 If it is the intention of the Plan to safeguard land in order to maintain rurality and create a buffer between the village boundary and the A30/Exeter, then it must be questioned why large tracts of agricultural land to the west of Roundfield – which are far closer in proximity to Ide village and suffer lower levels of both light and noise pollution – have been omitted from Policy IDE07.
- 3.13 The District Council remains in objection to the extent of the area to which Policy IDE07 applies.
  - 3.13.1 Taking into account the evidence presented, the District Council consider the identification of the entire Roundfield site within the enhancement area unjustified by the evidence presented and request a reduction in the area to include only the sites boundary hedging along the C50.
  - 3.13.2 A revised Enhancement Area Map is included (Appendix B) to illustrate a more appropriate policy area which is considered to fulfil the justification of the policy to maintain the rural character to the approach to Ide.

## 4 Planning Positively

- 4.1 National Planning Practice Guidance states that a Neighbourhood Plan gives communities the opportunity to shape the development and growth of their area and should plan positively to support local development.
- 4.2 The designation of Roundfield as a part of the Gateway Enhancement Area is not considered to constitute planning positively to support local development and it is considered by the District Council that its inclusion is seeking to prevent or frustrate development of the site as a Park and Ride facility serving Exeter, as identified in Policy SWE1 (South West Exeter Urban Strategy) and the current Teignbridge Infrastructure Delivery Plan 2016 (IPD).
- 4.2.1 The 600 space park and ride facility planned for the Ide/Alphington A30 junction at Roundfield forms part of Exeter's public transport strategy and is ***“critical to removing existing trips from the local road network in order to accommodate new trips which will be generated from the development”*** (SWE Development Framework, 2014, p.18).
- 4.2.2 The Teignbridge IPD 2016 (p.16) states that the proposed park and ride facility at Ide/Alphington A30 interchange is a ***‘Critical Strategic Priority’*** and has already identified funds of £3,600,000 to put towards the scheme to ensure housing land at SWE1 is capable of being brought forward.
- 4.3 Accompanying evidence to the plans consultation includes *“Notes of Parish Meeting 8<sup>th</sup> May 2017*. This meeting was called to discuss potential local green spaces but highlights a clear intention to prevent or frustrate a potential park and ride scheme previously proposed by Devon County Council (*below*).

*“If there was a way of using the Plan to protect Round Field against becoming a car park for Exeter, then we should try, came the feedback”* (page 2, Minutes of Parish Meeting, 8<sup>th</sup> May 2017).

- 4.3.1 A further Parish Meeting held on 11<sup>th</sup> November 2017 highlights additional comments regarding the use of the NDP to frustrate the scheme (*below*).

*“Round Field will be left in Policy 07 as TDC’s case is weak and we will listen to further advice and strengthen our argument”* (Page 1, Minutes of Parish Meeting, 11<sup>th</sup> November 2017)

*“We need to amend the wording (of IDE03: New Car Parking Areas) in the light of TDC’s comments as the policy must not be seen to support a Park and Ride scheme”* (Page 1, Minutes of Parish Meeting, 11<sup>th</sup> November 2017)

- 4.3.2 These notes highlight a clear intention to prevent or frustrate a potential park and ride scheme previously proposed by Devon County Council.
- 4.4 This overt opposition to the proposed Park and Ride scheme is evident throughout the Submission Document, including:

*“The village recently (March 2016) voted in its own referendum against a major Park and Ride development proposed by Devon County Council, serving Exeter, being located within the Parish”* (page 19, paragraph 5.6)

*“Concern about Round Field becoming a park and ride site, in future, was raised during the Community Consultation in February 2017 and discussed subsequently by the Parish Council”* (page 19, paragraph 5.6).

*“We remain opposed to the use of land in the Parish for any kind of major parking scheme that is not specifically intended to serve the needs of the Parish”* (page 19, paragraph 5.6).

*“In no way, should our policy IDE03 be interpreted as providing support for a park and ride scheme or a major car park to meet the needs of Exeter”* (page 19, paragraph 5.6).

- 4.5 In line with National Policy it is the role of a NDP to support specific development need of an area, not to seek to frustrate development that holds benefits for the wider area.

## **5 Conformity with strategic policies of the Local Plan**

- 5.1 Neighbourhood planning legislation requires a Neighbourhood Plan to meet a set of basic conditions in order for an examiner to recommend the plan to referendum.
- 5.2 One of these basic conditions is for the neighbourhood plan to be in general conformity with the strategic policies of the Local Plan.
- 5.3 The Local plan includes strategic policies S5 (Infrastructure) and SWE1 (South West Exeter Urban Extension). The Infrastructure Delivery Plan (IDP) supports these policies and provides additional detail to the timing, costing and location of required infrastructure. This document evolves and gets updated as the local plan period progresses to include more recent information of project costs and revised requirements.

### 5.3.1 Local Plan Policy S5 states:

The provision of new and improved infrastructure, such as education, health, transport, recreational facilities and green infrastructure will form a key issue in planning for the growth of sustainable communities.

- a) In consultation and co-operation with infrastructure providers, take account of infrastructure capacity and need in decisions on the location of development
- e) Ensure that new development is provided with appropriate infrastructure

5.3.2 Local Plan policy SWE1 allocates 92 hectares of land to deliver at least 2,000 homes to form a sustainable urban extension. Criteria G of this policy stipulates the urban extension requires public transport and highways improvements including an enhanced public transport route and 1,000 space park and ride hub. Supporting text to the policy states this would ideally be located to the South of the A379 at the intersection of the A30 and A379. The IDP 2013 which formed part the examination documents for the Local plan supported a park and ride facility in the area around the South West of Exeter.

5.4 Since the adoption of the Local Plan in May 2014 further investigations have been undertaken as to the potential location of the park and ride hub which have revealed the most suitable location as the Ide/Alphington A30 interchange. This is of critical priority with £3,600,000 of funding already identified. Whilst it is accepted by the Council that this site is not the only one being considered for the scheme, it is one of only a few possibilities identified and, due to constraints on other options, is considered the most likely choice.

5.5 Strategic policies S5 and SWE1 require the development of infrastructure to support sustainable communities, specifically development within the south west area of Exeter and the urban extension. SWE1 explicitly identifies the need for a park and ride to support sustainable development and the IDP 2016 identifies the area Roundfield as a potential location for this required park and ride scheme.

5.6 As noted above the inclusion of Roundfield within the Enhancement Area has been proposed to prevent a potential park and ride scheme, therefore failing to demonstrate planning positively to support the strategic development requirements of the district and standing in conflict with the strategic policies of the local plan and thereby failing to meet a basic condition required by legislation.

5.7 Local Plan Policy S22: Countryside, states that development will be limited in the countryside to uses necessary for “transport, communication and other infrastructure and community facilities” ..... and to those developments which reduce impact “on overall travel patterns arising from the scale and type of development”. It can be seen that any development of the Roundfield site into

a park and ride hub would therefore adhere to policy S22, subject to compliance with other local plan policies.

### **8 Comments on Other Policies with the Submitted Ide NDP**

- 8.1 Policy IDE01 (Residential Development in Ide), states the village's support for 'small residential development on infill and redevelopment sites within the built-up area of Ide Village', which it is felt should include the allocated Pynes Farm development and policy contained within should therefore relate. However, IDE02 (Pynes Farm) notes that Pynes Farm is "outside, but adjacent to, the built-up area". It is therefore unclear whether Policy IDE01 relates to Pynes Farm or not.
- 8.2 IDE03 (New Car Parking Areas) requires that any new parking provided should be only for the use of residents or "bona fide visitors". It is beyond the remit of planning land-use policy to dictate parking control measures and it is requested this policy be revised.
- 8.3 It is felt that the parking issues evidenced in Section 5 of the Plan, and subsequently Policy IDE03, could actually be ameliorated by the existence of a Park and Ride facility at Roundfield from where visitors could park at the facility and walk into the village, thus reducing traffic congestion, parking issues and pollution within the village.

### **9 CONCLUSION**

Teignbridge District Council formally object to the extent of Policy IDE07: Ide Gateway Enhancement Area on the following grounds:

- *The site identified in the Policy as Roundfield is geographically separated from the settlement of Ide and has no visual access to either residents or those using the C50, other than the presence of mature hedgerows and trees, the majority of which will be retained in the event of any redevelopment.*
- *The Enhancement Area is too extensive and includes the entire Roundfield site which has not been demonstrated to contribute to the enhancement of the areas sense of rurality.*
- *It is refuted that Roundfield is rural in character, with visual access directly onto the A30 and high levels of both noise and light pollution. This lack of rurality is evidenced not only by the Ide Gateway Character Assessment, but also by the CPRE and specialist environmental and geospatial consultancy Extrium (Figures 3.3.0 and 3.3.1 respectively) as well as by the District Council's Landscape Officer.*
- *There is evidence that the inclusion of Roundfield in Policy IDE07 has been specifically identified to frustrate strategic infrastructure development required to support a major residential allocation in the adopted Local Plan, which has wider benefits for the District as a whole.*



- *The inclusion of Roundfield in the Enhancement Area is contrary to Strategic policies S5 and SWE1 in the Local Plan and the IDP (2016), which identifies the Roundfield as a potential location for this required park and ride scheme.*

As such Roundfield should be excluded from the Enhancement Area with only the boundary screening along the C50 included as illustrated on the attached map (Appendix B).