

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

1. The comments below identify Teignbridge District Council's formal objection to two specific policies within the Pre-submission Ide Neighbourhood Plan, namely IDE06: Local Green Spaces and IDE07: Ide Gateway Enhancement Area.
2. These comments of objection accompany the compliance matrix which examines the plans conformity with the Local Plan and regard to National Planning Policy and guidance which are prepared separately.
3. **Policy IDE06: Local Green Spaces**
 - 3.1 The NPPF states local green spaces will not be appropriate for most green areas or open space and prescribes a number of criteria to be met for an area to qualify for the designation.
 - 3.2 The designation should only be used:
 - Where the green space is in reasonably close proximity to the community it serves;
 - Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - Where the green area concerned is local in character and is not an extensive tract of land.
 - 3.3 The District Council considers that the first two of these criteria have not been adequately met on proposed local green space H: Roundfield which is discussed below.
 - 3.4 Reasonably close proximity to the community it serves
 - 3.4.1 Roundfield stands approximately 850 metres from the village entrance and detached from the residents both in character and location. The site cannot be seen from any properties in the village, has no public right of access and is not readily accessible or visible from the public realm, with the exception of its boundary screening. It is appreciated that the term "in reasonably close proximity" is not defined however the detached, isolated location and hidden character of the site indicates it is not in reasonably close proximity to the community it intends to serve.
 - 3.5 Demonstrably special to a local community and holds particular local significance for its beauty and richness in wildlife
 - 3.5.1 This criteria requires a neighbourhood plan to demonstrate through evidence that an area is special to a local community and holds a particular local

significance. The Local Green Space analysis table on page 25 of the Plan illustrates the significance of the five proposed local green spaces. The common theme between them is a recreational justification with the exception of Roundfield which has been identified for its beauty and richness of its wildlife. These justifications are addressed individually below:

Beauty

3.5.3 The Plan provides little explanation as to why Roundfield holds a particular local significance for its beauty. The only demonstration of its beauty is to state the site stands within an Area of Great Landscape Value.

3.5.4 Area of Great Landscape Value (AGLV) designation covers the majority of the District which lie outside settlement boundaries. This blanket AGLV designation does not account for site specific landscape attributes which are usually identified and considered through individual planning applications and does not automatically confer a high scenic value to this particular site.

3.5.5 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, 5th May 2016

3.5.6 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.

3.5.7 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.”

Richness of Wildlife

3.5.8 Part of the evidence supporting the neighbourhood plan is the Wildlife Resource Map and Species Information supplied by Devon Biodiversity Records Centre in January 2017. This document identified that the parish has no statutory wildlife designations but has the following non-statutory wildlife designations:

- County Wildlife Site (CWS)
- Regionally Important Geological Site (RIGS)
- Unconfirmed Wildlife Site (UCWS)
- Ancient Woodland

3.5.9 This document identified Local Green Space G: Victorian Orchard as an unconfirmed wildlife site but conferred no wildlife designation upon Local Green Space H: Roundfield. This document therefore provides the evidence for richness of wildlife for one local green space but not for Roundfield.

3.5.10 Paragraph 7.10 of the plan makes reference to a to a third party study which identified dormice and slow worms on Roundfield. Further information from the District Council Ecologists identifies that Dormice are widespread in Devon and found on a high proportion of sites with slow worms also very common. The identified habitat of semi-improved grassland and mixed scrub on site is also widespread in Devon. Whilst the Jacobs study identifies wildlife on Roundfield the plan has failed to demonstrate how these common features in Devon hold a particular local significance.

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 local green space is not considered to constitute planning positively to support local development.

4.3 Accompanying evidence to the plans consultation includes *“Notes of Parish Meeting 8th May 2017 re designation of Round Field as Local Green Space”*. These notes highlight the reason for proposing the local green space designation on Roundfield was to prevent a potential park and ride scheme previously proposed by Devon County Council.

“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, Notes of Parish Meeting, May 2017.

4.4 A local green space designation should not be used as a reactionary mechanism to prevent a specific proposal. The designation should be based upon its specific valued attributes which hold particular local significance. The

inclusion of Roundfield as a local green space is an attempt to prevent development with justifications tailored to meet that aim. The designation of this site to prevent a potential park and ride scheme is not considered to demonstrate positive planning to support local development. The District Council objects to the inclusion of Roundfield as a local green space and request for the site to be removed from policy IDE06 and associated maps and supporting text.

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.
- 5.4 Local plan policy S5 states:
- 5.5 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
- 5.6 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.
- 5.7 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.

- 5.8 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 to which the Roundfield Local Green Space designation is proposed as a potential location for this required park and ride scheme.
- 5.9 As noted above the designation of Roundfield as a Local Green Space has been proposed to prevent a potential park and ride scheme, therefore failing to demonstrate planning positively to support local development and standing in conflict with the strategic policies of the local plan and thereby failing to meet a basic condition required by legislation.

6. Landowner

- 6.1 The National Planning Practice Guidance stipulates:
“the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space.” Paragraph: 019 Reference ID: 37-019-20140306
- 6.2 The Ide Plan text, evidence or consultation list does not appear to include any reference to the landowner of Roundfield. The proposed restriction on this parcel of land would significantly impede the landowner’s ability to develop and control their land and it is imperative they have the opportunity to understand the implications of this policy and provide an opportunity to comment.

7. Wording of policy IDE06

- 7.1 Policy IDE06 designates five areas for the local green space designation. Areas D to G are designated predominantly for their recreational value however area H has been designated for its richness in wildlife. The policy wording instructs that development which is not ancillary to community or recreational purposes will be resisted. A site designated for its biodiversity value should not include permissibility for recreational or community uses which could undermine the sites biodiversity and reason for designation. Site H: Roundfield, designated for its richness in wildlife, is not consistent with the community or recreational aims of the policy and should be removed.

8. Policy IDE07: Ide Gateway Enhancement Area

- 8.1 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.

- 8.2 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.
- 8.3 This is supported by *Ide Character Assessment Report 29 June 17* which seeks to provide the justifying evidence for the sites inclusion in the Enhancement area, which states:
- “Negatives*
- *Traffic congestion, with occasional gridlock at peak times*
 - *Traffic noise most times of the day*
 - *Unauthorised advertising signs”*
- 8.4 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).
- 8.5 The justification for the Roundfield inclusion within the enhancement area covers only the dense boundary screening along the C50 and does not provide justification for the designation of the entire site.
- 8.6 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.
- 8.7 A revised Enhancement Area Map is attached to these comments 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.

9. Conclusion

- 9.1 Teignbridge District Council formally object to policy IDE06: Local Green Spaces on the following grounds:
- The designation does not meet NPPF local green space criteria in that:
 - It is not considered in reasonably close proximity to the community it intends to serve
 - The demonstration of particular value and local significance has not been adequately demonstrated to justify the beauty and richness of wildlife reasons for designation.
 - Evidence to support richness of wildlife pre-dates the Wildlife resources study supplied by Devon Biodiversity Records Centre which did not identify any wildlife designations on site.

- The inclusion of Roundfield to prevent development does not constitute planning positively to support local development as required by national planning guidance.
- The designation stands in conflict with the strategic policies of the development plan thereby failing to meet a Basic Condition.
- The Roundfield landowner does not appear to have been directly contacted regarding the proposals on their site. The landowner must be contacted and provided the opportunity to understand and comment on the Neighbourhood Plans proposals for their land.
- Policy wording permits uses which are not considered ancillary to the wildlife reason for designation and this site should be removed.

9.2 In addition Teignbridge District Council formally object to the extent of the area to which policy IDE07: Ide Gateway Enhancement Area applies. The Enhancement Area is too extensive and includes the entire Roundfield site which has not been demonstrated to contribute to the enhancement areas sense of rurality. Roundfield should be excluded from the Enhancement Area with only the boundary screening along the C50 included as illustrated on the attached map.

APPENDIX