

## Ide Parish Council's representation in response to the Proposed Submission Version (Regulation 19) of the Teignbridge Local Plan 2020-40

This representation is made on behalf of Ide Parish Council, completed by Nick Bradley, Chair.

On 3 March 2023 at 7.30 pm the Plan was presented and discussed at a Public Meeting in Ide Memorial Hall, attended by 78 residents (whose names were recorded). Ide's population is 479. The points made here were all put forward by people at that meeting. While no formal vote was taken, the recurrent applause and tone of the meeting was in wholesale support of the points below.

### 1. Legal Compliance / Soundness

#### **1.1 Policy GP5 of this Proposed Local Plan (LP) is on Neighbourhood Development Plans.**

It describes the general purpose and functions of Neighbourhood Planning; and identifies Policy EE1 Markham Village as a Strategic Policy.

Ide Neighbourhood Plan (Ide NP) was made and adopted in September 2018. Policy IDE01 in the NP, on Residential Development in Ide; and Policy IDE07, on the Ide Gateway Enhancement Area, are directly related to Proposed LP policy EE1.

Teignbridge Council themselves, in the Teignbridge Local Plan Review 2020-2040, Part 1, March 2020, at section 5.0 have noted that "all currently adopted neighbourhood plans are material considerations in decision-making and plan-making."

At p13 the question 'How can the Council best ensure that Neighbourhood Plans are reflected through the Local Plan Review?' is posed. In answer, the officers say that "the LP will also reflect specific NP policies / ambitions within site specific allocations or policies".

Additionally, the next draft of the LP, Part 2, in May 2021, contained a Consultation Statement which said: "Neighbourhood plans are a material consideration in plan-making and have informed the selection of site options in the Draft Plan". And Section 10 of this Proposed Submission version of the LP says: "The Local Plan Review 2020-2040 gives weight to Neighbourhood Plan policies and designations (eg Local Green Spaces, views, and site allocations)".

Regardless of these previous comments on the importance of neighbourhood plans in local plan making, we submit that Teignbridge has not taken proper - or any - account of the relevant policies in Ide NP. We see no evidence of material consideration or weight being given to Ide NP in relation to EE1, Markham Village. The LP contains no description or analysis of Ide NP policies: just a link to the NP in a section listing the NPs in Teignbridge.

We submit that the relevant neighbourhood planning policies that should have been taken into account are as follows:

**Ide NP Policy IDE01** says "Development proposals for small residential developments on infill and redevelopment sites within the built-up area of Ide village will be supported subject

to proposals being well designed and meeting all relevant requirements of the Local Plan [2013-2033], and where such development:

- i. fills a small, restricted gap in the continuity of existing frontage buildings or on other sites within the built-up area of the village where the site is closely surrounded by buildings; and
- ii. does not result in significant encroachment into the countryside; and
- iii. provides a suitable and safe access, ensures the privacy of adjoining properties and seeks to enhance the character of the area; and
- iv. provides, whenever feasible, for at least one small dwelling, with two or fewer bedrooms, for every one larger dwelling with three or more bedrooms.

This policy is entirely in conflict with the building of 900 homes in the countryside of Ide Parish: a large scale development with significant encroachment into the countryside. Yet the policy is not acknowledged in the LP.

**Ide NP Policy IDE07** says "Proposals for development within the Ide Gateway Enhancement Area (IGEA) will only be supported if they do not have an adverse impact on the rural character of the Village entrance or its approaches along the C50 (Ide Village Road). Development proposals within or adjoining the IGEA should not harm the rural character of the designated area through:

- i. the loss, damage or deterioration of hedgerows, trees and ditches;
- ii. an increase in air or light pollution (including street lights);
- iii. entrance ways inappropriate to the rural setting; or
- iv. intrusive advertising or signage".

The house building proposed in the LP would adjoin the IGEA; it is understood that the roads serving a new Markham Village would result in entrance ways inappropriate to the rural setting; and there would be street lights. The rural character of Ide village would be permanently lost, dwarfed by a new village in the parish of 900 homes, with the potential for the two "villages" to merge on future planning application appeal, despite TDC's assurances in the LP.

The only reference to either policy comes in May 2021 in the draft LP (Part 2), chapter 7: "..[Ide NP] contains policies that set standards for new development, support new car parking and development of sports and recreational facilities at Weir Meadow, protect existing sports and recreational facilities and protect the rural setting of the village. It also designates green spaces". No hint here that the policies are in direct conflict with the ambitions of the LP; and no detail of what the policies actually say. The bland précis implies, wrongly, that they are uncontroversial.

We submit that the proposed LP is in conflict with the Ide NP.

The March 2020 Consultation Statement, at p365 on page 20, did tackle one area of conflict between Ide NP and the draft LP, over Round Field and a potential Park & Ride, which was resolved and is not part of this LP version. But TDC has not worked with Ide Neighbourhood Planning group to address the other conflicts that Policies IDE07 or IDE01 present.

We submit that TDC do have a duty, as set out in their own documents, to identify and address head on, both in discussion and in print, the details of conflicts with policies in Neighbourhood Plans.

If TDC assumed that the policies in Ide NP were "out of date", deserving of no 'material consideration', and that a new LP could simply ignore them, that reasoning should appear in the document. In fact, what reference there is to Ide NP in the LP and its drafts gives assurance that proper consideration will be given to the NP policies. There is no reasoning given for failing to consider those policies.

**1.2 Policy GP7 is about Infrastructure and Transport Networks**  
**Policy GP1 is about Sustainable Development**  
**Policy CC4 is about Climate Change**

We submit that insufficient attention has been given to the transport [GP7] and sustainable development [GP1 criteria 1 and 4] problems created by policy EE1.

In particular The Parish Council notes that GP1.4 of the LP says that proposals must perform well against certain criteria including road safety and traffic congestion. We submit that policy EE1 for Markham Village is unsound because a principal challenge of this development is its likely adverse impact on congestion around the site, in Alphington and in Exeter, yet there is no highway infrastructure scheme to support the proposals.

The negative impact on traffic congestion would be particularly great along Ide Village Road. For much of the day, and especially at morning and evening rush hours, traffic backs up from Alphington Road, along the spur road to the A30 Alphington Junction roundabout, and then back along Ide Village Road. At peak times during the summer, and following an incident on the trunk road network, traffic tails back all the way along Ide Village Road to its junction with the B3122 at Pocombe Bridge, causing gridlock. These roads are already congested, before the current major developments being built in SW Exeter have been occupied, leaving aside the extra traffic generated by 900 more homes at Markhams Farm draining on to Ide Village Road and Shillingford Road.

The proposal for policy EE1 cannot, in our view, be seen to perform well against policy GP1.4 of the LP and we therefore consider it to be unsound.

In addition, the LP takes no account of traffic impacts described above, primarily because TDC has failed to undertake any traffic study. The planning officers at TDC have confirmed that they intend to undertake such surveys, but after this consultation closes. Adoption of the LP including Markhams Farm is, therefore, premature and at this point unsound, in our view, until these traffic surveys have been conducted and considered.

In the introduction to the Edge of Exeter section of the LP, officers acknowledge the traffic and infrastructure sensitivities. They are right when they say "The infrastructure of the city needs to be improved to accommodate new growth". However, Exeter City Council and

Devon County Council need to be worked with effectively in a spirit of strategic co-operation to address these issues, rather than TDC allocating houses and expecting the infrastructure to support them will be provided by the bordering local authority, who have significant concerns about policy EE1:

"Transport routes into and around the city are already constrained and accommodating additional movements is a challenge for the city's transport network."

Yet no serious analysis of how trains could reduce car commuting to Exeter from Teignbridge. Newton Abbot and Teignmouth are both served by regular train services into Exeter. Exminster is close to the train line but has no station. There is a new train station being built at Marsh Barton, and Exeter is served by multiple rail stations. The LP fails to plan how to achieve more rail travel in Teignbridge, reduce road commuting to Exeter, and get people out of their cars and onto the train.

The LP proposes some general solutions to the problem: "Therefore, there are measures contained within each of the allocation policies to maximise travel by sustainable modes and to minimise car trips. This will be achieved by securing high quality, attractive and safe active and sustainable travel routes, which link to existing sustainable travel routes, as set out in the Exeter Local Cycling and Walking Infrastructure Plan (LCWIP)." However, this does not recognise that many of the LCWIP routes are "proposed" and as yet unfunded. Would there be a policy that the development must contribute to the Exeter LCWIP.

In relation to Markham Village specifically the officers suggest:

- an extension of existing bus services and provision of new bus stops to serve the new development;
- safe and suitable vehicular access to the site to be taken from both Markham Lane and from Ide Village Road;
- further modelling will determine if the proposals must contribute to junction or safety improvements associated with impacts on the strategic road network;
- creation of a low traffic neighbourhood built with full site permeability by foot and bicycle.

In fact there are no detailed measures worked up with Highways in a scheme to address these issues. The only drawings are illustrative and conceptual, made by a commercial firm instructed by the developers, which could be changed and carry no weight. We contend that the transport plans - road layouts, traffic flow, signalling, bridges, cycling and pedestrian paths are a such critical issue for the entire LP that it should stand or fall on the merits and feasibility of detailed solutions.

Five examples:

- extending the bus service will not be easy [GP7]. The A route is already a very long and convoluted route. Extending it further means it will be unattractive to existing and new users. This needs to be thought out now with a realistic proposal agreed by Teignbridge and the County Council or it is unlikely to happen as the bus companies have sufficient existing challenges running the current service.

- the spine road through the development has a blockage in the middle, making it difficult for movement within the site for mobility impaired, families who need to transport multiple children, elderly people, buggies. It's been put in, we assume, to spread the traffic load out between Ide Village Road and Markham Lane/ Shillingford Road. Spine roads are usually

considered to provide better permeability and cohesion within the site, not act as a barrier. An example of this is the one Teignbridge are building at Dawlish between Elm Grove Road and Sainsburys. It would mean people from one side will have to drive all the way around to get to the other side putting more traffic on local roads [GP1, criterion1]. The policy should be changed to be more generic saying the road should be designed as a local internal link with appropriate traffic calming measures.

- The hilly nature of the site, separated from Exeter by the A30, will not favour walking or cycling. Although electric bikes enable cycling on hills, these are only available to adults. Older primary school children will struggle even if younger children are on bikes with parents. The generous allocation of parking spaces, depending on house size, for each new home at Markham Village, will encourage car use and dependency. Both of these issues do not support policy CC4 on climate change.

- walking and cycling needs to address the severance of the A30 [GP1 criteria 1 and 4]. The route along Balls Farm Road is unlit, and a long way west of even the closest houses. Crabb Lane is not realistic without major works at Clarke's Pond, which floods in heavy rain. The current public footpath then shown as the recommended active travel route goes across riding school fields to a crossing, rarely used, of the very busy spur road to the A30 roundabout. This route could not reasonably be the basis for supporting the suitability of the site.

Figures from Ide NP showed that only around 12% of journeys into Exeter are made by cycle or on foot, even with the footbridge leading directly out of the village.

The Ide Village Road route is more direct for cyclists, but is hostile to cycle along and would need a shared pedestrian/cycle space. Crossing the A30 slip roads is very difficult and dangerous, even for an intrepid, adult cyclist.

The impact on the Strategic Road Network needs an assessment. The new development will enter the roundabout and impede the A30 off slip road from Okehampton. This in turn will increase the existing congestion on this link which may back up onto the main line. This is a potential serious safety issue and will need a detailed assessment by National Highways. The junction between Ide Village Road and the Tedburn Road at Pocombe Bridge is most unsatisfactory and a potential safety problem as drivers take risks turning out of Ide Village Road due to congestion on the approach.

None of these points is addressed, because no study has yet been undertaken.

It is not enough to rely on "further modelling". It is premature, in our view, to bring plans to this final point in the LP process with so little detail for solving the acknowledged transport problems.

Coming on stream now and over the next four years are 2,400 homes in SW Exeter, 160 homes in Victoria Heights, 182 in Aldens Farm and 234 in Matford Farm - all on the Edge of Exeter (EE). These estates will all take traffic into Church Road, to Alphington Road, which is already clogged back up to the Alphington Junction A30 roundabout, and up the slips onto

the A30. Exeter CC has a policy of limiting the number of cars using Shillingford Road, which cuts right across the traffic effects of half of Markham Village driving down it.

In our view it is premature to plan for another 900 homes to drain traffic into the same already congested road system [GP7] before the effects of the current building effort is realised. Nowhere in the LP are these new Exeter homes and their effects on the transport network of Exeter discussed or materially considered.

The infrastructure delivery plan for Markham Farm contains provisions that are not guaranteed, yet underpin the LP's compliance with policies GP1, GP7, CC4 and EE1 itself: for example the neighbourhood hub, primary school and realistic, new active travel routes in the LCWIP for pedestrians and cycles. Without worked up schemes and commitments at this final stage of the local plan, Markham village could simply be an isolated housing estate on the side of a hill, without facilities, made up of houses and roads with cars.

We therefore submit that the Local Plan is unsound.

### **1.3 Criteria 10 and 12 of GP1 are about sustainable development:**

#### **Criterion 10 - "Protecting and where possible enhancing the character, appearance and historic interest of affected landscapes."**

The green landscape character of Exeter's south western backdrop is permanently threatened by the hillside village. Simply preserving the upper horizon of the green fields does not protect the backdrop. Exeter City Council, as well as Ide Parish Council, are opposed to losing this backdrop, and are raising their significant concerns about it.

#### **Criterion 12 - "Avoiding, where possible, the best and most versatile agricultural land and minimising the impact of development on soils."**

All three parcels of land in EE1 are grade 2 agricultural land, and the best agricultural land for many miles around. It is possible, we contend, to avoid using this land at Markham Farm, a Devon County Council dairy farm, by better use of brownfield sites. The NPPF refers to the importance of protecting and enhancing valued landscape.

We are unaware if there has been an independent Landscape Impact Assessment as part of the Sustainability Appraisals as we are concerned with quality assessment of the landscape and views from the city towards Haldon. Landscape quality should be assessed as part of a strategic planning process and in connection with a specific development which will affect the landscape.

### **1.4 GP2 Development in Teignbridge.**

This policy is about where to put TDC's allocation of houses. The officers in the LP argue that more Teignbridge residents should be living near - on the Edge of - Exeter where many of them work.

Criterion 1 says: "Maximise the co-location of new homes with job opportunities, services and public transport links so that the majority of new development takes place close to the main towns and Exeter, reinforcing their roles as the key economic and service centres of the plan area and the Garden Community status of Newton Abbot and Kingsteignton".

We submit that an equally sustainable option would be for Newton Abbot residents to come to Exeter by train, then cycle, just as people commute into other large cities, preventing them having to move home.

A key problem is that Exeter CC explicitly do not welcome a large village isolated by the A30 on their border. Teignbridge are trying to solve their problem at Exeter's expense, which in our view is unacceptable.

One proposal is for a new Primary School. No mention is made of the implications for Ide Primary School. The Local Plan needs to be clear on what is envisaged.

### **1.5 EN6 Flood risk and Water Quality**

Section 1.24 of the Local Plan (LP) states that the Infrastructure Delivery Plan (IDP) provides details of what new infrastructure is being planned for, when it is required and how it will be delivered. Section 5 of the IDP describes that, in relation to Countess Wear Sewage treatment works (STW), there is a critical need across the life of the LP for a 'catchment strategy to identify need to reinforce sewer network/investment plan'. No such plan has been provided with the supporting documents.

EN6 (6) & (9) and EN10 (8) state that planning will not be granted for any proposal that is going to lead to pollution or impact a European Wildlife site or irreplaceable habitat. It is clear that the LP and supporting documents fail to positively and adequately address the required sustainable sewage provision and impact that the Edge of Exeter developments will have on the sewer network, the environment and the legislation that protects it.

Parts of Ide village are in flood zone 3, and there are properties which are close to flooding due to lack of capacity at the bottom of the village. There is concern that at times of very high rainfall the SUD system for the new development will not be able to cope and surface water will drain into the stream. This will exacerbate an existing problem.

## **2. Complying with the Duty to Co-operate**

We submit that the District Council has not complied with its duty to co-operate as it should with Exeter City Council: constructively, actively and on an ongoing basis, as the regulations state. The cross border issues are enormous, and needed proper, material consideration.

There is a mention of meetings and discussions taking place with the Exeter Greater Strategic Plan team; and a list of other bodies with whom the LPA met. But there are no descriptions or dates of any debate or ongoing co-operative forum.

The absence of any highway study relating to the local or wider highway network; and the fact that Exeter City Council have significant concerns about Markham Village on grounds of landscape and transport connectivity is evidence of itself of a lack of proper co-operation to

explore or try to resolve key issues, illustrating the duty to co-operate has not been complied with.

END