



Thank you for taking the time to provide us with your comments on the Local Plan 2020-2040 Proposed Submission document.

Your Submission:

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Agents Name (if used): Andrew McKeon

Examination Hearings: Local Plan 2020-2040

Participation comments (if you do wish to participate):

Local Plan Hearing:The Edge of Exeter proposals will have a very significant adverse impact for Exeter on traffic, climate change, infrastructure and the landscape.

The proposals fail to take adequate account of Exeter City Council's and East Devon District Council's plans and will result in further major adverse impacts on traffic, climate change, infrastructure, availability of employment and the landscape.

CIL Hearing:

Staying in Touch: Yes

Your Comments:

| Document | Part | Legal/Sound/Duty to co-operate | Comments | Modification Comments |
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| | | | <p>1. The Plan has been prepared on the basis of current government housing targets. However, the government is consulting on revised targets and has already made clear its intention to move away from mandatory ones. In particular, the government has said that local authorities like Teignbridge District Council (TDC) will not be subject to such targets where development would change the character of an area. This would certainly be the case for the proposed developments on the Edge of Exeter. Other councils, for example East Devon, have decided to pause work on their plans and proposed developments pending revised government guidance. TDC should do the same and review its required housing numbers. Proceeding with the plan in its current state would result in an unsound plan which did not reflect government guidance in the National Planning Policy Framework for the period which the plan will operate.</p> <p>2. The plan is unsound and fails to meet the Duty to cooperate with</p> | |

| Document | Part | Legal/Sound/Duty to co-operate | neighbouring councils – specifically East Devon District Council (EDDC) and Exeter City Council (ECC) - as evidenced by the following: Comments • The proposals do not properly take into account EDDC's proposed allocation | Modification Comments |
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| Local Plan 2020-2040 Proposed Submission - Whole Plan Comment | Whole Plan Comment | yes / no / no | <p>of land for a new town of 8000 homes on the eastern edge of Exeter and further developments along the eastern side of the Exe estuary. These, combined with TDC's own proposals for developments on Exeter's western side and along the western side of the Exe estuary, will together present major increases in traffic flows and unacceptable pressure on the nationally important Exe estuary. Exeter is acknowledged in both plans to be the major centre for employment and services.</p> <ul style="list-style-type: none"> • The 2011 Census showed that over 80 percent of people who lived in the surrounding district councils travelled by car when commuting into Exeter. Only 2 per cent cycled and 1 per cent walked. These developments are too far from Exeter for walking and too far for nearly all cyclists. Overall, Exeter will see significant increases in motor traffic from these developments which would be contrary to both TDC's and ECC's aims on climate change, air quality and active travel. • The NPPF requires that the impact on the nearest town centre be properly taken into account. Exeter is the town centre for significant parts of the plan but the impact on it has not been properly taken into account, and indeed largely ignored. • The proposals do not take account of ECC's own plan issued for consultation at the end of last year. The TDC plan continues to assume that Marsh Barton which is currently a major area of employment will continue to be so. However, ECC propose to designate this area for mixed use and indeed expect a major housing development there of some 7000 homes. Existing plans for development of the Water Lane area propose some 2000 homes. Together, these developments would increase Exeter's population west of the Exe by some 20000 people. TDC's existing developments at Exminster and along the A379 when added to the proposed Edge of Exeter allocations in this plan would achieve a population of 15000 – more than many towns in the region but without suitable plans for infrastructure. The combined effect of ECC's proposals and those of TDC would lead to an increase in population of some 35000 for which there is inadequate provision for infrastructure in the plans and which will lead to unacceptable additional traffic. • ECC's plans for Marsh Barton will result in a significant loss in employment land. Much that would remain would be needed for the additional infrastructure required for 7000 extra houses such as primary and secondary schools and health facilities. However, TDC's plan which already notes at 4.2 that the demand for employment land far outstrips supply, seems to assume that employment land will continue at Marsh Barton. The proposed employment land at the Peamore development will not compensate for the loss from Marsh Barton. Moreover, many of the jobs currently at Marsh Barton are not those which can be done at home (for example car showrooms, building suppliers) so will need to be relocated, probably to the east of Exeter, so adding to traffic and pollution. • Overall, as set out above, the lack of effective cross border cooperation over the plan between TDC, ECC and EDDC in the plans is evident and needs to be addressed before the plan is finalised. The Duty to cooperate has not been | Review of housing numbers and allocations in light of forthcoming government guidance before plan is finalised. |

| Document | Part | Legal/Sound/Duty to co-operate | <p>met. We understand ECC will itself be expressing concerns and objecting to some aspects of the Edge of Exeter proposals.</p> <p style="text-align: center;">Comments</p> | <p>Modification</p> <p>Comments</p> |
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| | | | <p>Exeter Civic Society objects to the proposed allocation of land for housing at Markham on the grounds that the proposals are both unsound and do not meet the requirements of the Duty to cooperate. We understand that ECC has expressed concerns about the proposed allocation of housing at Markham on landscape and infrastructure/traffic grounds demonstrating that the Duty to cooperate has not been met.</p> <p>CLIMATE CHANGE AND SUSTAINABLE TRAVEL</p> <p>1. The proposals, particularly when taken together with the other Edge of Exeter allocations fail to take proper account of the impact on the town centre – in this case Exeter. They will lead to significant increase in traffic, contrary to Teignbridge District Council 's (TDC) and Exeter City Council's (ECC) aims on climate change, air pollution and active travel. The plan acknowledges that it is an explicit strategic decision to site developments close to Exeter because of its services and dynamic economy. However, the 2011 Census showed that 85 per cent of commuters from neighbouring councils travel to Exeter by car. Residents will continue to be largely dependent on their cars for travelling to Exeter. The plan proposes mitigation through construction of walking routes, cycle paths and facilities for bus services and says that these will help ECC reach its aim of 50% of trips in the City being made by sustainable modes of travel. There is no realistic possibility of this figure being reached with the additional development proposed, unless NO Exeter resident ever uses a car in the City.</p> <p>2. The 2011 Census showed that over 39% of trips in the City by the 37700 Exeter residents who live and work in the city are either walked or cycled. The figure is over 50% if bus travel is included. 25500 people commuted into Exeter from the neighbouring authorities, but only 3.3% walked or cycled and 6.5% came by bus (4.7% came by train but this is not an option from this proposed development. The figures for walking and cycling will not increase significantly. Markham is too far from Exeter centre for walking.</p> <p>3. Markham is also too far for cycling for most people. Figures for trip length in the Exeter Local Cycling and Walking Infrastructure Plan showed that only 2 per cent of cycling journeys on traditional bikes exceeded 3 miles, although about a quarter did so on e-bikes. These developments will be greater than 3 miles away from the main facilities. Better public transport would be helpful but current and probable future experience is that bus transport is unreliable and unlikely to make a significant impact.</p> <p>4. Because of the distance from Exeter and the need to travel to work TDC will also not meet its target of 50% of all trips made should be by bike, walking or public transport (Policy CC4).</p> <p>EMPLOYMENT</p> <p>5. The proposals do not take account of Exeter City Council's (ECC) own plan issued for consultation at the end of last year. TDC's plan continues to assume that Marsh Barton which is currently a major area of employment will continue to be so. However, ECC propose to designate this area for mixed use and indeed expect a major housing development there. The proposed employment land at Peamore will not compensate for this. Employment and travel patterns will radically change and are not taken into account in the plan.</p> | |

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| Edge of Exeter Site Allocations (EE1-EE4) | EE1: Markham Village | yes / no / no | <p>6. TDC's plan already notes at 4.2 that the demand for employment land far outstrips supply. Given the proposed allocations above means that employment land for the proposed housing allocation and potentially existing developments will be in very short supply. Not all residents will be able or wish to work at home.</p> <p>7. The decline of Marsh Barton as an area of employment means that employment will be focused on the city centre (see first point) and the eastern edge of Exeter. Car travel will be the only realistic option to reach the eastern edge of Exeter. However, East Devon District Council (EDDC), while proposing some expansion of employment land in this area, also propose allocations for a new town of 8000 houses on the eastern edge of Exeter in addition to the expansion of Cranbrook. Whether the extra employment land proposed by EDDC is sufficient to meet the demands of the new town along with the needs of new populations west of the Exe is extremely doubtful.</p> <p>8. EDDC also propose allocations for housing along the eastern side of the Exe estuary which will again be largely reliant on Exeter for employment and services, adding to traffic on a road which EDDC acknowledge can become very congested. The road infrastructure to the along the south side of Exeter is already congested. Further traffic from TDC will only serve to increase congestion and pollution to the detriment of climate change targets. The Sustainability Assessment notes the likely cumulative adverse effect of TDC's and ECC's plans on the road network and air quality.</p> <p>INFRASTRUCTURE</p> <p>9. The proposed allocations at Markham and Peamore when taken with the existing developments at Exminster and along the A379 will mean that there will be a population just to the west of Exeter of some 15000 people – larger than many towns in the region. All will be dependent on Exeter for main shopping and leisure facilities and for employment (although see above in relation to the loss of employment land at Marsh Barton, part of Exeter). There is inadequate provision in the plan for infrastructure to meet the needs of this additional population.</p> <p>10. The Sustainability Assessment notes that the current planned or existing secondary schools have no spare capacity and will not meet the demands of the new population at Peamore and Markham.</p> <p>11. Shopping facilities will be limited with some small developments. A population of this size needs at least a 'district centre' similar to that being planned for near Sowton in Exeter. Leisure facilities must be added, for example a swimming pool in order to avoid additional journeys and pressure on facilities in Exeter. The Peamore employment land would be a possible site for all these infrastructure facilities although they would further reduce the land available specifically for employment.</p> <p>12. If these facilities are not planned for or not forthcoming, a fair share of the Community Infrastructure Levy, any S106 agreement and council tax generated should be allocated to ECC as residents will look to Exeter for such facilities.</p> <p>13. The allocations at Markham and Peamore, when taken with the other existing developments will place unacceptable pressure on the A379 and Alphington Road and the existing pinch points leading in to Exeter. A highways infrastructure would be needed to link the communities together. It</p> | |

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| | | | <p>would need widened road, cycle and pedestrian access and improved public transport. This should be included in the highways assessment.</p> <p>IMPACT ON NHS</p> <p>14. The plan proposes that there should be financial contributions for education infrastructure. The development will also place additional pressure on already stretched NHS primary, community and acute services but this has been ignored. NHS services should be placed on the same footing as education services.</p> <p>LANDSCAPE</p> <p>15. The plan notes the possible impact on the landscape on Exeter's skyline. It seeks to mitigate this by saying there will be careful planning and restrictions on building on the higher elevations and ridges of the hills. Care would also be taken to ensure protection of views from listed buildings where the view was an essential part of their character, citing Colleton Crescent's view of Haldon Belvedere as an example. This is not sufficient. The landscape and views apply to Exeter generally, not only heritage assets. The Sustainability Assessment notes that 'All of these development sites could contribute to the further erosion of the rural character of the landscape and reinforce the urbanising effects of the major road network in the areas on the outskirts of Exeter'.</p> <p>16. The proposals are inconsistent with one of the main policies in the Plan. The specific site allocations speak of mitigating their impact on the landscape. But, the environmental policy EN1 says that development proposals will be required to conserve or enhance landscape character and to enforce local distinctiveness and that they must 'protect, and where appropriate restore, specific landscape and seascape features, including trees, hedges, and woodlands, that reinforce local landscape character or quality and conserve or enhance the significance of designated landscapes and historic landscapes that provide the settings for heritage assets'. Building on the hills west of Exeter would be directly contrary to Policy EN1.</p> <p>17. The proposed mitigation of planting a green backdrop to the development (which we assume means trees) would take many years to grow, would not fully hide the building and, in any case, the landscape is not wooded, so going against the letter and spirit of EN1 which seeks to preserve the existing landscape features. Inconsistency within the Plan demonstrates that it is unsound.</p> <p>18. The Landscape Assessment concentrates on maintaining the skyline from Exeter in relation to the ridge. But, this is an inadequate response to the landscape itself and its value which applies to both the slopes and the hill top ridge. Policy EN1 says that 'Landscapes that provide or contribute to the distinctive setting and separate identity of settlements within and adjacent [in this case Exeter] to Teignbridge District will be conserved and enhanced.' EN4 1a states that developments will be located and designed to conserve or enhance landscape and seascape character and to reinforce local distinctiveness'. The allocation for development at Markham directly contradicts these policies.</p> <p>19. The site directly adjoins the neighbouring authority ECC and, as such, TDC is required to consult and agree matters (a "statement of common</p> | |

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| | | | <p>ground”), with the neighbouring authority. TDC’s proposals directly contradict ECC’s desire to protect the landscape and green hills around Exeter. As of March 1st 2023 ECC are not agreeing that the proposals at Markham are acceptable.</p> <p>20. The ECC/Teignbridge boundary is contiguous between the A30 underpass west of Ide, and the A30 overbridge at Shillingford Road. The Markham land allocation falls within this extent. The development proposed at Markham will effectively bridge the gap between Shillingford Abbott and Ide, so contradicting the policy at EN1.</p> <p>21. Contrary to the observations and conclusions within the TDC Landscape Sensitivity Assessment (January 2023) the site, and development upon it, will be clearly visible from within Exeter in particular along Topsham Road, Western Way and Colleton Crescent.</p> <p>22. In the TDC landscape study Fig 6 (the Theoretical Zone of Visibility for development over 10m height on the allocation site) shows that Exeter will be impacted by development at Markham, but with no specific viewpoints described. In fact, these will be multiple and spread around many locations within the City.</p> <p>23. Fig 9 of the TDC assessment provides an illustrative configuration of how Markham could be developed. The site is currently open grassland. The development of a residential estate with public open space, which is itself an urban form of land use, is entirely contrary to the qualities of the existing landscape.</p> <p>24. Following an independent landscape assessment, the Exeter Local Plan to 2040 identifies 32 areas requiring Landscape Protection. One of the main elements is the protection of the open undeveloped hillsides and higher land around the City. On the Exeter side of the district boundary, the TDC site allocation at Markham is directly adjacent to ECC landscape protection areas LP29 and 30. The higher open land, which currently provides the landscape setting to the City lies to the south at Markham, within Teignbridge. This land is currently designated as an Area of Great Landscape Value, a designation which is not being carried forward into the 2040 Local Plan (see landscape protection within the NPPF). However, it still remains worthy of this higher level of protection from development under the BOX 5.1 rules in the Landscape Institute’s “Guidelines for Landscape and Visual Assessment”</p> <p>25. Earlier landscape input to the Markham site suggested that the proximity of the Haldon Belvedere (an uninhabited monument) may be a landscape issue but no other factors were mentioned.</p> <p>26. There is no evidence in the published TDC documents that an up to date cross boundary landscape assessment has so far been undertaken. Such an assessment is essential given the wide negative visual impact the Markham development will have on Exeter.</p> | |
| | | | <p>Exeter Council objects to the proposed allocation of land for housing at Peamore and West End on the grounds that the proposals are both unsound and do not meet the requirements of the Duty to cooperate.</p> <p>CLIMATE CHANGE AND SUSTAINABLE TRAVEL</p> <p>1. The proposals, particularly when taken together with the other Edge of Exeter allocations fail to take proper account of the impact on the town centre – in this case Exeter. They will lead to significant increase in traffic, contrary to Teignbridge District Council’s (TDC) and Exeter City Council’s (ECC) aims</p> | |

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| | | | <p>on climate change, air pollution and active travel. The plan acknowledges that it is an explicit strategic decision to concentrate developments close to Exeter because of its services and dynamic economy. However, the 2011 Census showed that 85 per cent of commuters from neighbouring councils travel to Exeter by car. Residents will continue to be largely dependent on their cars for travelling to Exeter. The plan proposes mitigation through construction of walking routes, cycle paths and facilities for bus services and says that these will help ECC reach its aim of 50% of trips in the City being made by sustainable modes of travel. There is no realistic possibility of this figure being reached with the additional development proposed, unless NO Exeter resident ever uses a car in the City.</p> <p>2. The 2011 Census showed that over 39% of trips in the City by the 37700 Exeter residents who live and work in the city are either walked or cycled. The figure is over 50% if bus travel is included. 25500 people commuted into Exeter from the neighbouring authorities, but only 3.3% walked or cycled and 6.5% came by bus (4.7% came by train but this is not an option from this proposed development. The figures for walking and cycling will not increase significantly. Peamore is too far from Exeter centre for walking for most people.</p> <p>3. Peamore is also too far for cycling for most people. Figures for trip length in the Exeter Local Cycling and Walking Infrastructure Plan showed that only 2 per cent of cycling journeys on traditional bikes exceeded 3 miles, although about a quarter did so on e-bikes. The developments will be greater than 3 miles away from the main facilities. Better public transport would be helpful but current and probable future experience is that bus transport is unreliable and unlikely to make a significant impact.</p> <p>4. Because of the distance from Exeter and the need to travel to work TDC will also not meet its target of 50% of all trips made should be by bike, walking or public transport (Policy CC4).</p> <p>EMPLOYMENT</p> <p>5. The proposals do not take account of ECC's own plan issued for consultation at the end of last year. TDC's plan continues to assume that Marsh Barton which is currently a major area of employment will continue to be so. However, ECC propose to designate this area for mixed use and indeed expect a major housing development there. The proposed employment land at West End will not compensate for this. Employment and travel patterns will radically change and are not taken into account in the plan.</p> <p>6. TDC's plan already notes at 4.2 that the demand for employment land far outstrips supply. Given the proposed changes above means that employment land for the proposed housing allocation and potentially existing developments will be in very short supply. Not all residents will be able or wish to work at home.</p> <p>7. The decline of Marsh Barton as an area of employment means that employment will be focused on the city centre (see first point) and the eastern edge of Exeter. Car travel will be the only realistic option to reach the eastern edge of Exeter. However, East Devon District Council (EDDC), while proposing some expansion of employment land in this area, also propose allocations for a new town of 8000 houses on the eastern edge of Exeter in addition to the expansion of Cranbrook. Whether the extra employment land</p> | |

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| Edge of Exeter Site Allocations (EE1-EE4) | EE2: Peamore and West Exe | yes / no / no | <p>proposed by EDDC is sufficient to meet the demands of the new town along with the needs of new population. Exe is extremely doubtful.</p> <p>8. EDDC also propose allocations for housing along the eastern side of the Exe estuary which will again be largely reliant on Exeter for employment and services, adding to traffic on a road which EDDC acknowledge can become very congested. The road infrastructure to the along the south side of Exeter is already congested. Further traffic from TDC will only serve to increase congestion and pollution to the detriment of climate change targets. The Sustainability Assessment notes the likely cumulative adverse effect of TDC's and ECC's plans on the road network and air quality.</p> <p>INFRASTRUCTURE</p> <p>9. The proposed allocations at Peamore and Markham when taken with the existing developments at Exminster and along the A379 will mean that there will be a population just to the west of Exeter of some 15000 people – larger than many towns in the region. All will be dependent on Exeter for main shopping and leisure facilities and for employment (although see above in relation to the loss of employment land at Marsh Barton, part of Exeter). There is inadequate provision in the plan for infrastructure to meet the needs of this additional population.</p> <p>10. The Sustainability Assessment notes that the current planned or existing secondary schools have no spare capacity and will not meet the demands of the new population at Peamore and Markham. The proposed subsidised buses will not resolve this problem</p> <p>11. Shopping facilities will be limited with some small developments. A population of this size needs a 'district centre' similar to that being planned for near Sowton in Exeter. Leisure facilities must be added, for example a swimming pool in order to avoid additional journeys and pressure on facilities in Exeter. The West End employment land would be a possible site for all these infrastructure facilities although they would reduce the land available specifically for employment.</p> <p>12. If these facilities are not planned for or not forthcoming, a fair share of the Community Infrastructure Levy, any S106 agreement and council tax generated should be allocated to ECC as residents will look to Exeter for such facilities.</p> <p>13. The allocations at Markham and Peamore, when taken with the other existing developments will place unacceptable pressure on the A379 and Alphington Road and the existing pinch points leading in to Exeter. A highways infrastructure would be needed to link the TDC communities together. It would need widened road, cycle and pedestrian access and improved public transport.</p> <p>14. There will need to be an improved footbridge and cycle path over the A30 to link Peamore to Matford as the present one has inadequate pavements.</p> <p>15. These improvements should be included in the plan now rather than waiting for a highways assessment.</p> <p>IMPACT ON NHS</p> <p>16. The plan proposes that there should be financial contributions for education infrastructure. The development will also place additional pressure on already stretched NHS primary, community and acute services but this has been ignored. NHS services should be placed on the same footing as</p> | |

| Document | Part | Legal/Sound/Duty to co-operate | <p>education services.</p> <p>LANDSCAPE</p> <p>Comments</p> <p>17. The plan notes the possible impact on the landscape on Exeter's skyline.</p> | <p>Modification</p> <p>Comments</p> |
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| | | | <p>It seeks to mitigate this by saying there will be careful planning and restrictions on building on the higher elevations and ridges of the hills. Care would also be taken to ensure protection of views from listed buildings where the view was an essential part of their character, citing Colleton Crescent's view of Haldon Belvedere as an example. This is not sufficient. The landscape and views apply to Exeter generally, not only heritage assets. The Sustainability Assessment notes that 'All of these development sites could contribute to the further erosion of the rural character of the landscape and reinforce the urbanising effects of the major road network in the areas on the outskirts of Exeter'.</p> <p>18. The proposals are inconsistent with one of the main policies in the Plan. The specific site allocations speak of mitigating their impact on the landscape. But, the environmental policy EN1 says that development proposals will be required to conserve or enhance landscape character and to enforce local distinctiveness and that they must 'protect, and where appropriate restore, specific landscape and seascape features, including trees, hedges, and woodlands, that reinforce local landscape character or quality and conserve or enhance the significance of designated landscapes and historic landscapes that provide the settings for heritage assets'. Building on the hills west of Exeter would be directly contrary to Policy EN1.</p> <p>19. The proposed mitigation of planting a green breaks in the development (which we assume means trees) would take many years to grow, would not fully hide the building and, in any case, the landscape is not mainly wooded, so going against the letter and spirit of EN1 which seeks to preserve the existing landscape features. Inconsistency within the Plan demonstrates that it is unsound.</p> <p>20. The Landscape Sensitivity Assessment concentrates on maintaining the skyline from Exeter in relation to the ridge. But, this is an inadequate response to the landscape itself and its value which applies to both the slopes and the hill top ridge. Policy EN1 says that 'Landscapes that provide or contribute to the distinctive setting and separate identity of settlements within and adjacent [in this case Exeter] to Teignbridge District will be conserved and enhanced.' EN4 1a states that developments will be located and designed to conserve or enhance landscape and seascape character and to reinforce local distinctiveness'. The allocations for development at Peamore and West End directly contradict these policies.</p> <p>21. In the TDC landscape study Fig 6 (the Theoretical Zone of Visibility for development over 10m height on the allocation site) shows that Exeter will be impacted by development at Peamore and West End, but with no specific viewpoints described. In fact, these will be multiple and spread around many locations within the City.</p> <p>22. Fig 9 of the TDC assessment provides an illustrative configuration of how Peamore could be developed. The site is currently largely open grassland. The development of a residential estate with public open space, which is itself an urban form of land use, is entirely contrary to the qualities of the existing landscape.</p> | |

| Document | Part | Legal/Sound/Duty to co-operate | 23. There is no evidence in the published TDC documents that an up to date cross boundary landscape assessment has so far been undertaken. Such an assessment is essential given the wide negative visual impact developments | Modification Comments |
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| Edge of Exeter Site Allocations (EE1-EE4) | EE4: Attwells Farm | yes / no / no | <p>at Peamore and West End will cause. This should also include a cross Exeter Civic Society objects to the proposed allocation of housing land at boundary landscape visual impact assessment before rather than after a decision is made on the allocation requirements of the duty to cooperate. We understand that Exeter City Council (ECC) is similarly objecting.</p> <p>1. Development on the allocated land requires cooperation with ECC as part of the site lies within ECC's boundary. It does not seem right under the Duty of cooperation that an authority can force unwanted development on a neighbouring one when part of the site falls within the latter's boundary. There should be a jointly agreed way forward or none at all.</p> <p>INFRASTRUCTURE AND CLIMATE CHANGE</p> <p>2. The plan proposes a significant increase in traffic, the impact of which will mostly be borne by ECC. The provision of cycle ways and pedestrian routes will help. However, there is no employment land on the site. More generally, Teignbridge District Council's (TDC) plan already notes at 4.2 that the demand for employment land far outstrips supply. Unless working from home, residents will need to travel some distance by car unless working in the very centre of Exeter. This will involve cross town journeys, particularly as Marsh Barton will decline as an employment area and be substantially replaced by 7000 houses under ECC's draft plan. This will further hinder ECC from reaching its sustainable travel targets to combat climate change.</p> <p>3. Traffic from any development will be funnelled through Kinnerton Way to St Andrew's Road which is too narrow to take additional traffic.</p> <p>4. The crossing over the Exe is already a significant pinch point because of the main line level crossing immediately after it. It will be greatly worsened from the additional traffic, resulting in increased congestion and pollution to the detriment of climate change targets. The Sustainability Assessment notes the likely cumulative adverse effect of TDC's and ECC's plans on the road network and air quality.</p> <p>5. Although objecting to the allocation, were it and any development to go ahead, a fair share of the Community Infrastructure Levy, any S106 agreement and council tax generated should be allocated to ECC as residents will look to Exeter for facilities and the burden will overwhelmingly fall on ECC.</p> <p>6. The plan proposes that there should be financial contributions for education infrastructure. The development will also place additional pressure on already stretched NHS primary, community and acute services but this has been ignored. NHS services should be placed on the same footing as education services.</p> <p>LANDSCAPE</p> <p>7. A development at Attwell's Farm will further and unacceptably encroach on the landscape, part of the green hills surrounding Exeter and an important part of its setting.</p> <p>8. The proposals are unsound as they are inconsistent with one of the main policies in the Plan. The specific site allocations speak of mitigating their impact on the landscape. But, the environmental policy EN1 says that development proposals will be required to conserve or enhance landscape character and to enforce local distinctiveness and that they must 'protect, and</p> | |

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| | | | <p>where appropriate restore, specific landscape and seascape features, including trees, hedges, and woodlands reinforce local landscape character or quality and conserve or enhance the significance of designated landscapes and historic landscapes that provide the settings for heritage assets'. Building on the hill above Exwick would be directly contrary to Policy EN1.</p> <p>9. The Landscape Sensitivity Assessment categorises the site as having high to moderate sensitivity to residential development. However, the assessment concentrates on maintaining the skyline from Exeter. This is an inadequate response to the landscape itself and its value which applies to both the slopes and the hill top ridge. Policy EN1 says that 'Landscapes that provide or contribute to the distinctive setting and separate identity of settlements within and adjacent [in this case Exeter] to Teignbridge District will be conserved and enhanced.' EN4 1a states that developments will be located and designed to conserve or enhance landscape and seascape character and to reinforce local distinctiveness'. The allocation for development at Attwell's Farm directly contradicts these policies.</p> <p>10. In the TDC landscape assessment study Fig 6 (the Theoretical Zone of Visibility for development over 10m height on the allocation site) shows that Exeter will be impacted by development at Attwell's Farm, but with no specific viewpoints described. In fact, these will be multiple and spread around many locations within the City.</p> <p>11. Fig 9 of the TDC assessment provides an illustrative configuration of how Attwell's Farm could be developed. The site is currently largely open grassland. The development of a residential estate with public open space, which is itself an urban form of land use, is entirely contrary to the qualities of the existing landscape.</p> <p>12. The proposed mitigation of planting green breaks in the development (which we assume means trees) would take many years to grow, would not fully hide the building and, in any case, the landscape is not mainly wooded, so going against the letter and spirit of EN1 which seeks to preserve the existing landscape features. Inconsistency within the Plan demonstrates that it is unsound.</p> <p>13. There is no evidence in the published TDC documents that an up to date cross boundary landscape assessment has so far been undertaken. Such an assessment is essential given the wide negative visual impact development at Attwell's Farm will cause. This should also include a cross boundary landscape visual impact assessment before rather than after a decision is made on the allocation.</p> | |

| Document | Part | Legal/Sound/Duty to co-operate | Comments | Modification Comments |
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| Design and Wellbeing Policies (DW1-DW3) | DW3: Design Standards | yes / no / yes | 1. The plan is unsound because it is internally inconsistent. As part of its climate change agenda TDC proposes that 'For major developments at least 50% of trips should be made by walking, cycling and public transport' and to 'Promote public transport, cycling and walking as transport modes of choice, minimising dependence on cars'. (Policy CC4). However, Policy DW3 intends that new 2and 3 bed dwellings would each have a minimum 2 parking spaces and 4 bed dwellings, 3. This a tacit admission that cars will be the main mode of travel. While this may be necessary in truly rural areas it is not so for many of the developments proposed, e.g., on the Edge of Exeter, which are more like towns and with reasonably near access to a major centre and major facilities. If policy CC4 is to be realised, car use and ownership needs to be limited e.g., to 1 parking space (or at most 2) per dwelling and prohibition of on-road parking in residential areas. | Reduce the number of parking spaces to a maximum of 1 or, at most, 2. |
| Climate Change Policies (CC1-CC7) | CC6 Wind turbine development | yes / no / no | Policy CC5 on solar panels has a requirement (f) that a cross boundary sensitivity assessment be mad. There is no such requirement in Policy CC6 for wind turbines. The allocations above Exwick will directly affect the landscape from Exeter. Not to have such an assessment is unsound and not in the spirit of the Duty to cooperate. | Include a cross boundary assessment similar to 'f' in CC5 |

Community Infrastructure Levy (CIL) Draft Charging Schedule

I wish to comment: No

Status of Representation:

CIL Comments:

Comments on the Proposed CIL rates

Do you agree with the proposed charges?:

If no, Your comments:

| Charging Zone | Charges | Your recommended charge | Comments |
|---------------|---------|-------------------------|----------|
| | | | |