

RESPONSE TO TEIGNBRIDGE DISTRICT COUNCIL'S

LOCAL PLAN REVIEW 2021 PART 3

Renewable Energy, Gypsy and Traveller and Small Residential Sites

SUMMARY

Exminster Parish Council has considered the Local Plan Part 3 draft covering Renewable Energy, Gypsy and Traveller and Small Residential Sites.

The Parish Council was surprised at the publication of this consultation, and feel that in the interests of collaboration, as required by the National Planning Policy Framework, the existence of Part 3 could have been signposted much earlier so that sufficient resources could be assigned to review and for it to be completed within the time limits. The lack of collaboration during the Local Plan Review has already been highlighted in the Parish Council's response to Part 2 of the Local Plan.

The Council has, however, within the time limits imposed by Teignbridge District Council and in the spirit of co-operation, considered Part 3 and present this response.

Renewable Energy. The Council (supported by the majority of residents in the Community Plan Questionnaire in 2019) is fully committed to the principle of encouraging renewable energy to mitigate the effects of Climate Change, and so is broadly in agreement with the Renewable Energy section of Part 3. The Council proposes amendments to both the Draft Wind Energy Policy, and the draft Solar PV Policy. It makes comments on Wind Site 22 at Powderham New Plantation which is the only site in Exminster Parish. The Council recognises the significant positive impact the turbine would make to mitigate climate change, but nevertheless presents the impacts of such a development to the local community. A smaller wind turbine facility would be preferred in such an area of sensitivity near the Exe Estuary. The Council has not been able to review the smaller turbine sites proposed in the Plan as they are not available online and due to the limited time available for this review. Several anomalies are highlighted in the areas which are designated as suitable for solar such as in flood zones and in areas already proposed for development in Part 2 of the Plan.

Gypsy and Traveller Sites. The Council feels that, as the nearest site to Exminster is at Ashburton, they will simply recommend that air and noise pollution levels are set to low levels to facilitate the wellbeing of the residents, together with safe pedestrian access from the site into Ashburton. Exminster Parish Council is, however, fully supportive of the principle of provision for travellers having suffered an illegal encampment on Parish Council land in Exminster during the summer of 2021.

Small Residential Development. The Council objects to the proposed small residential development on Days Pottles Lane. The arguments against this development are similar to those made in the Council's response to Part 2 of the Local Plan in that they will have a disproportionate and unsustainable impact on Exminster's infrastructure and facilities such as the school and GP surgery, mains/storm/surface water and sewage, traffic and roads. The arguments against development include flawed calculations on the housing requirements. The Council then presents detailed impacts on the ecology and landscape, infrastructure and the amenity of current residents.

The Parish Council is more than happy to discuss these representations at the appropriate stage of the Consultation.

DETAILED REPRESENTATIONS

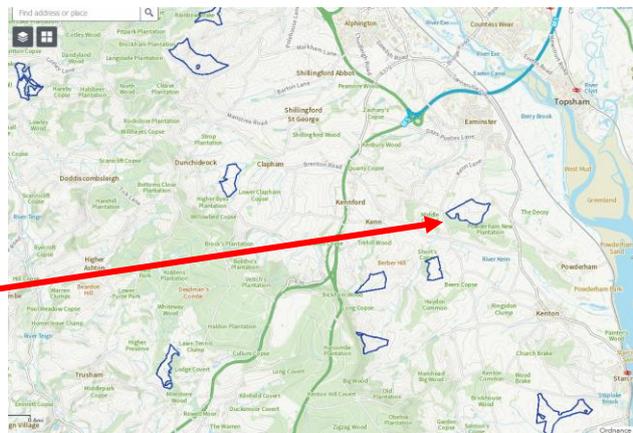
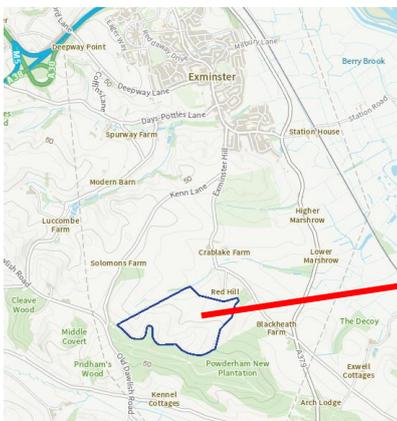
Draft Renewable Wind Energy Policy

This Policy is accepted with three comments.

- Item c, flood risk and water quality, should be expanded so that it includes the protection of the natural water courses, and
- Item e should be rephrased to “land and soil quality” so that it isn’t limited to agricultural land.
- The statement “Wind development will be removed once no longer in economic use and the land restored.” should be changed to

“A lifetime period is attached to any wind turbine development. Once turbines are no longer in economic use, they will be either removed for reuse at another site, or all of the components of the turbine recycled. The land will be restored to the same state that it was in before the turbines were installed”.

Comments on Wind Site 22 – Powderham New Plantation



There is one 2MW technically possible site proposed that is partially within the parish of Exminster. It covers 31 hectares of land between Solomon’s Farmhouse, Crablake Farm and Blackheath Farm.

Potential impacts are:

- **Ecology.** There has been no detailed survey work on protected bat activity, but the site lies entirely within a Cirl Bunting Wintering Zone and there are several breeding territories nearby. The RSPB Reserve at Exminster Marshes is world renowned for species habitats. The proposed size of the site is 31ha with open aspects along the Exe Estuary from Exminster Golf Centre, Woodbury Common, Topsham and Lympstone.
- **Landscape.** The site lies within an area of high landscape sensitivity to a large scale (76-110m) wind turbine farm. The effect will certainly be an eyesore across the bowl of the Exe Estuary, and all flying creatures (bats, bees, birds, insects) and people will lose amenity of

the woods, marshes and fields. Effects are portrayed as only being for the duration of the economic use (20-30 years), however, taking into account commissioning and decommissioning of around 4 more years the damage to the soils and substructure are unknown. Also, this development alongside Powderham Plantation with the proximity of another wind turbine site near to Willsworthy Farm in Kenton, could have a cumulative effect on the landscape. Although the site is just over 1km from the Exminster Village Settlement Limit, scoring a lesser effect on the quality of the general built environment, it is in a gently sloping scenic area of the 'bowl' around the River Exe provided by Exminster Hill, Powderham Plantation, Woodbury Common and Aylesbeare Common.

- **Heritage.** The site is near the Grade II* Powderham Castle estate.
- **Water Resources.** Powderham New Plantation lies adjacent to a watercourse system of drains leading directly down to Exminster Marshes and the development process could impact on water quality. However, this is uncertain as it is dependent on construction techniques.
- **Housing.** The site lies just over 1km from the Settlement Limit in Exminster village and the relationship of the site to the old village of Exminster is reduced because it is behind a steep hill. However, many developments around the edge of the village centre are at a higher level so will be in the line of sight, as will many of the additional development sites that are being discussed within the Local Plan.
- **Travel and highways.** The site lies more than 500m from the A379, M5 and main railway line. Although the effect is uncertain in the absence of details of the height of the turbine and of the size of the rotating blades, it may cause a distraction to motorists or train drivers.
- **Health & Wellbeing.** Existing residential properties and businesses lie within 450m of the site. Development could have significant negative effects on residential amenity and businesses from noise and potential flicker from spinning blades for the lifetime of the development.
- **Climate Change Adaptation.** The site lies entirely within Flood Zone 1 and would be dependent on the proportion of hard surfacing within the greenfield site and SuDS provision made.

Smaller Wind Turbine Sites

There are approximately 12 x 500KW sites on the District Overview Map though not on the TDC Portal link and only available in the hard copy. These sites have not been reviewed due to the limited time available for this review.

Draft Solar PV Renewable Energy Policy

This Policy is accepted with three comments.

- Item c, flood risk and water quality, should be expanded so that it includes the protection of the natural water courses, and
- Item e should be rephrased to "land and soil quality" so that it isn't limited to agricultural land.

- The statement “Solar PV development will be removed once no longer in economic use and the land restored” should be changed to

“A lifetime period is attached to any Solar PV development. Once panels are no longer in economic use, they will be either removed for reuse at another site, or the components of the panels recycled. The land will be restored to the same state that it was in before the panels were installed”.

Possible Solar Sites



Several obvious anomalies have been identified in the sites which are presented as suitable for solar PV.

- Some of the sites have already been proposed as possible residential sites in Part 2 of the Local Plan review. The comments made in the Parish Council response to Part 2 with respect to the impact on Ecology and Wildlife are, obviously, equally applicable to the installation of Solar PV.
- The Ridgetop Park (SANGS) has been identified as suitable.
- Areas along Sannerville Way (A379) which are in Flood Zones 2 or 3.
- Crockwells Meadow, owned by Exminster Parish Council, and which is reserved for the amenity of the public.

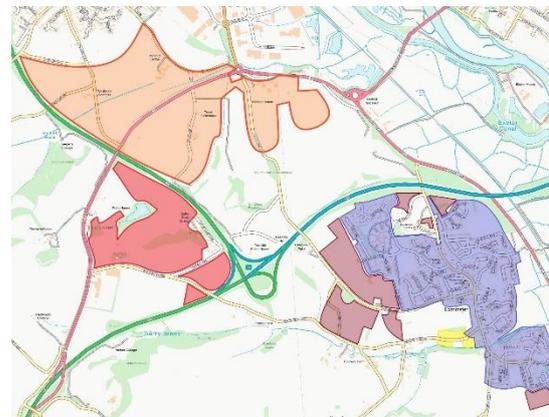
Arguments against Housing Development in Exminster

The Parish Council has already set out its arguments against further development in Exminster Parish in its response to Part 2 of the Local Plan. These arguments remain equally valid for the small residential development proposed for Days Pottles Lane. Briefly these are:

1. Teignbridge District Council (TDC) is required by the National Planning Policy Framework to collaborate with Parish Councils before making proposals. This has not happened.
2. When determining its housing requirement, TDC has chosen to include a 'buffer' of 20%, even though it is permitted to choose 5%. Reducing the buffer to 5% reduces the numbers by approximately 3000 and therefore removes the need for any further development in Exminster within the Plan period and would wholly remove the need for this residential development.
3. Exminster Parish Council (EPC) was not consulted to provide or contribute to a housing needs analysis, nor were they consulted for their views on the local issues and constraints that affect development proposals in the Parish e.g., there is no realistic prospect of increasing infrastructure within the village simply because of space constraints. Neither the GP surgery nor the school can be expanded on their present site and there are no suitable alternative sites available.
4. The Parish of Exminster has absorbed a population increase of almost 40% over the past 20 years, with no significant increase in infrastructure (surgery, school, highways, etc). The South West Exeter development (SWED), already accepted by the Parish Council and factored into the Neighbourhood Development Plan, will double the size of the population over the next 5-10 years.
5. With ongoing development on this scale in the Parish, a significant period is required to assess and mitigate the impact on the lives of residents. It is simply not acceptable, at any human level, to plan for the continued blighting of lives through continuous development and loss of amenity, for a further 20 years.
6. Within Teignbridge, Exminster Parish has about 3% of the population (before the SWED) and about 4% of the land, yet TDC are proposing it should accept another 16% of the proposed development. There can be no justification for skewing the development proposals towards a single Parish in this way.
7. The Days Pottles lane small residential development is outside the settlement limit and erodes the green buffer between Exminster village and the urban extensions, which make Exminster a village. These green areas and country lanes are important to the health and wellbeing of residents, support the local ecology, and their benefits have been highlighted throughout the pandemic.
8. Further housing off Days Pottle's Lane would result in increased traffic within Exminster and the country lanes, where it is inconceivable that improvements could be made to cater for it.

Major routes into and out of Exminster, and around the wider area, would be significantly impacted as well.

Comments about the land to north and south of Days Pottles Lane for small residential development



The total size is 2.38ha, of which 1.56ha TDC consider as developable for 25-37 homes (suburban / rural). Exminster does not consider this area is fit for development for the following reasons:

- **Ecology and landscape impact:** The site lies within the Exe Estuary Special Protection Area (SPA) and the Dawlish Warren Special Area of Conservation (SAC) 10 km zone, and development of this site will generate extra visitors. The site may contain protected species including bats, Cirl Buntings, otters and dormice. The southern area is adjacent to Hooper's Field Unconfirmed Wildlife Site identified for semi-improved grassland and scrub. There is no public mains sewer along Days Pottles Lane beyond a few metres from the junction with the Main Road. Therefore, all development would require cesspits and any overflow would go into Berry Brook, carrying effluent down to Exminster Marshes and the Exe River. Berry Brook is a special wildlife corridor with biodiversity value.
- **Heritage:** The site is within half a kilometre of Devington Park, the former Exe Vale hospital which is Grade II listed building, and its former Lodges and Chapel.
- **Highways & Access:** Days Pottles Lane is a narrow and twisty lane with no pedestrian footpaths which would make it difficult for pedestrians walking between the village and the new development. The visibility splays that would be necessary to provide access will be large and require removal Devon hedges with an impact on wildlife.

There are several pressure points along the length of the lane for traffic. The exit from Days Pottles Lane into the village is constrained by buildings on the edge of the road with limited visibility to the east. The exit at the other end, at Frank Tuckers, is onto the A379 where

people turning right towards Exeter and the M5 would need to cross a busy road; this would make travelling through Exminster more attractive for these vehicles.

Access to Deepway Green for the tennis court, allotments and children's play facilities is via a steep and narrow footpath not suitable for the elderly, disabled, pushchairs and wheelchairs. Other similar facilities are quite distant.

- **Infrastructure - Education:** Exminster Primary School is at capacity and there is no opportunity to expand it on its current site. The level of development proposed would not be sufficient to generate demand for a new school or fund its delivery.
- **Infrastructure - Health.** The GP surgery is at capacity and cannot be expanded.
- **Infrastructure – sewage, mains water drainage and surface water.** No sewage treatment improvements have been considered for this or previous proposed housing developments. Surface water and storm water management is non-existent, there are no drains.
- **Amenity of Existing Residents:** There are safety concerns over cars entering and leaving the new proposed development onto a narrow lane, and then transiting through the village, worsening the queue of traffic onto the A379 Sannerville Way and crossing Bridge Road at peak times. There would also be an increase in emissions and noise caused by these vehicles.

Distribution

Councillor Alison Foden	Teignbridge District Council Kenn Valley Ward
Councillor Charles Nuttall	Teignbridge District Council Kenn Valley Ward
Councillor Andrew Swain	Teignbridge District Council Kenn Valley Ward
Councillor Alan Connett	Teignbridge District Council, Leader of the Council Devon County Council, Exminster & Haldon Ward
Councillor Gary Taylor	Teignbridge District Council Planning Portfolio Holder
Rt Hon Mel Stride MP	Member of Parliament, Central Devon
Mrs Juliette Thompson	Clerk to Shillingford Parish Council
Ms Penny Clapham	Clerk to Kenn Parish Council