

Newton Poppleford and Harpford Parish Council

Comments on the Emerging Local Plan

Strategic Policy – Levels of future housing development

1. Aspects of the plan would benefit from revision following the removal of Government compulsory housing targets. The numbers of houses required to be built should now be radically decreased to focus only on those required for local need.
2. Focussing on the western side of the region for additional major development is logical but Council has serious concerns about the way a new town would impact on the character of the area and result in East Devon becoming less attractive to visitors and those wishing to relocate.
3. Council is also concerned that such a major development based around the A3052 would increase traffic levels on this major route and contribute further to Newton Poppleford's traffic problems. Council appreciates that problems for pedestrians and cyclists are acknowledged in the draft plan but also notes that there are no indications as to how such problems will be remedied. Council would require clarity on proposed infrastructure improvements:
 - i) Road transport – the A3052 at Clyst St Mary (where the A376 meets the A3052) and on to Sandygate / M5 J30 is already at capacity at peak times. Similarly, the capacity for the A30 / Heavitree road to accommodate more commuter traffic is questioned. For this reason it is suggested that dedicated bus lanes and/or a train/cycleway connection is considered as required to mitigate the inevitable increase in commuter traffic from a new conurbation
 - ii) Medical facilities – it is clear that existing medical services are stretched beyond capacity. Future master planning must include a demonstrable commitment for a dedicated, manned GP surgery to accommodate the requirements of up to 20,000 residents from the new conurbation.
 - iii.) Water / effluent treatment – further housing development can only exacerbate the current lack of processing capacity for effluent treatment, particularly in times of storm. Future master planning must require the inclusion of additional effluent treatment works to make up the existing shortfall in capacity and “future-proof” the capacity requirement for a new town.

Strategic Policy – Employment provision and distribution

1. Council would prefer to see a combination of residential, retail and employment provision rather than individual housing estates, retail parks and industrial estates to avoid the necessity for residents to drive to work or shop.
2. Mixed use developments are much preferred for the reasons set out above.

Strategic Policy – Development inside settlement boundaries

1. Councillors are uncertain as to why the designated ‘Settlement Boundary’ for Newton Poppleford differs from the BUAB which increases the area where development will be supported in principle. This proposed expansion is not supported by the Parish Council as it has not been consulted on and has not been democratically approved. The recently “made” Neighbourhood Plan reinforced residents’ support for the maintenance of the existing BUAB.
2. Council notes that the additional areas of land included within this new Settlement Boundary are generally unsustainable for development being in the flood plain, within the

AONB or designated as Grade 1 Agricultural Land. As stated in the extant Neighbourhood Plan, Council would not, in principle, support development on these areas of land.

Strategic Policy – Development outside settlement boundaries

1. Council agrees with the outcome of the HELAA process as it relates to this parish and is encouraged by references to the importance of Neighbourhood Plans.

91. Policy – Ecological enhancement and incorporation of design features to maximise the biodiversity value of proposals

Item 1.

Integral swift boxes be specified in place of 'bird boxes' as recommended by the RSPB. Council would also like bat and bee boxes to be recommended as in the NP Neighbourhood Plan.

Item 4

RSPB to be asked to specify the correct materials for overhanging eaves to ensure that nests are secure for the whole of the nesting period.

Item 5

ALL boundaries to incorporate holes of the appropriate size.

All items above to be made compulsory.

The use of clear glass i.e. on balconies should be avoided as dangerous to birds.

92. Policy – Trees

Council does not believe this policy to be stringent enough in parts:

1. Policy should protect hedgerows and trees. In particular, traditional Devon hedges should be protected and retained wherever possible.
2. A minimum specification for street tree planting should be stated to avoid developers paying lip service to this requirement.
3. Minimum of 1 tree per garden should be stipulated (appropriate tree for garden environment). For developments with larger green spaces a minimum number of trees should be stipulated.
4. Minimum number of trees for new hedgerows to be stipulated.
5. Trees to be planted a minimum distance from buildings (or buildings erected a minimum distance from existing trees) to ensure that mature trees do not have to be felled in future because they are undermining buildings.
6. Policy required to protect Ancient Orchards, Woodland and Veteran Trees as these are irreplaceable habitats. There should be a presumption of refusal for development which may harm such habitats.

94. Policy – Protection of designated geological sites

As drafted this policy is not strong enough – it allows too much room for developers to argue in favour of development for the 'public benefit'.

95. Policy – Protection of important geological and geomorphological sites

Such sites should be fully protected and development not permitted.

103. Policy - Listed Buildings

Council is concerned that the drafting of this policy allows developers an opportunity to justify causing harm to listed buildings.

104. Policy – Conservation Areas

Item 2 – the word “substantial” is not measurable and will allow developers with large financial resources to overwhelm public opposition. This comment is also relevant to:

105. Policy – Archaeology and Scheduled Monuments

29. Strategic Policy – Promoting renewables

In this instance the word “unacceptable” is not defined – schemes should only go forward with the support of the community.

In all three policies money should not be the deciding factor.

Strategic Policy – Climate Emergency

ALL new builds should meet this policy

Strategic Policy – Net Zero Carbon Development

Policy should be implemented as an integral part of new development. New developments should also create their own energy to avoid the need to instal more wind and solar farms. See also:

Strategic Policy – Energy Storage

Every new development should have the facility to produce and store energy.

Strategic Policy – Flooding

This Council does not support any development on land at risk of flooding.

Strategic Policy – Design and Local Distinctiveness

This policy as drafted uses a number of terms which are not measurable or are subjective. For example:

“worthy of retention” – in whose opinion?

“necessary and appropriate” – in whose opinion?

“safe” – what is considered safe?

“good levels of daylight” – what is “good”?

Item 7 Bullet point 6 – “space” should include private garden space. Front gardens should not constitute private garden space.

Item 7 Bullet point 1 - To retain distinctiveness and character, developments of more than 5 houses should stipulate a variation in design detail.

Item 8 – should mitigate against the adverse impact of light pollution.

