

**SHILLINGFORD ST GEORGE PARISH COUNCIL RESPONSE TO TEIGNBRIDGE DISTRICT COUNCIL DRAFT LOCAL PLAN CONSULTATION FOR THE PERIOD 2020 TO 2040**

We are writing in response to the Draft Local Plan for the period 2020 – 2040 which you have circulated for comment.

The plan contains two sites which impact on our Parish.

**Markhams Farm** – where 727 houses are proposed.

**Peamore** – where 933 houses are proposed.

The Markhams Farm site is within the Parish of Ide but is adjacent to our Parish throughout the length of Markhams Lane

The Peamore Site is partly within Exminster Parish and partly within Shillingford St George Parish. The plan as drafted refers to the site being purely within Exminster Parish which is incorrect. This needs to be amended.

Shillingford St George Parish Council has considered both sites in detail and wishes to express in the strongest possible terms our total opposition to the sites being included in the Local Plan as potential locations for housing development. This view was unanimously supported by Parishioners at a public meeting that we held on 20<sup>th</sup> July 2021.

Our reasons for opposing development of the two sites is set out below.

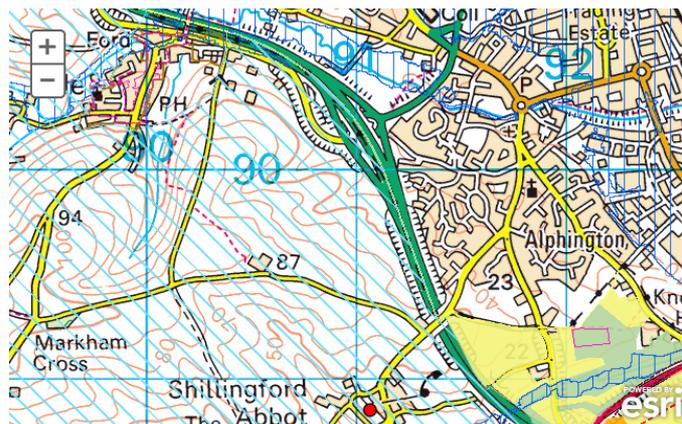
1.	<b>MARKHAMS FARM</b>
1.1	<b>Natural Environment and Landscape</b>  a) The site is totally rural in character and consists of high quality agricultural land which is being actively farmed. 



- b) The current Teignbridge District local plan for the period ending 2033 designates Areas of Great Landscape Value which are defined as: -

‘Areas of high landscape quality with strong distinctive characteristics which make them particularly sensitive to development. Within ALGVs the primary objective is conservation and enhancement of their landscape quality and individual character.’

The following plan is exacted from the official Teignbridge local plan and shows that the site is in an AGLV which is denoted by the blue hatching shown below.



- c) The proposed site being set on a hillside would be highly visible from large parts of Exeter and would further erode the unique rural setting of the City.
- d) Houses built in fields at the western end of the proposed site between the Markhams Farm and Polehouse Lane would be clearly visible from the Haldon Hills and surrounding countryside and would adversely impact on the landscape setting of Haldon Belvedere.
- e) The plan describes the site as being “predominantly flat or gently sloping developable land”. This is misleading. Only a small part of the site around the farm could be described as being flat. It’s a hillside site which slopes

	<p>down to the A30, in places quite steeply and at the western end to Markhams Lane. As such the development would be highly visible from a wide area.</p> <p>f) The site lies within the Exe Estuary SPA and Dawlish Warren SAC 10km Zone. The site contains habitats for various protected species including Bats, Dormice and Great Crested Newt.</p> <p>g) A proposed site for Travellers on part of the proposed development land was abandoned a number of years ago partly because of the adverse visual impact it would have on the area.</p> <p>h) The site lies within the Parish of Ide who have a Neighbourhood Plan which is a legal document sitting alongside the Teignbridge local plan when planning applications are considered. The Plan is designed to protect the rural character of the village and its environs. The plan states that there is limited potential and capacity for new housing in the village of Ide and there is certainly no reference in it to the destruction of large areas of agricultural land surrounding the village for housing development.</p> <p>i) The Teignbridge Local Plan Policy S21 identifies Ide amongst those villages that will be appropriate locations for limited development which meets social and economic needs, if such development <i>“protects their rural character”</i>. <b>To help protect this rural character the Local Plan Policy S22 has classified the land outside of the built-up area boundary as open countryside, “where development and investment will be managed to provide attractive, accessible and biodiverse landscapes...”</b>. The NPPF (para. 61) says that planning policies <i>“should address the connections between people and places and the integration of new development into the natural, built and historic environment”</i>.</p>
1.2	<p><b>Historic and Built Environment</b></p> <p>The landscape contains known archaeological sites – prehistoric or Roman Settlements.</p>
1.3	<p><b>Land Use</b></p> <p>a) The proposed site is currently high quality productive agricultural land which would be destroyed if it was to be developed for housing.</p> <p>b) A large part of the site is occupied by a County Farm, owned by Devon County Council and leased to a tenant farm holder. We understand that due to the success of the farm the County Council acquired 85 acres (34 hectares) of additional land in 2009 to accommodate extra livestock. We therefore find it very difficult to comprehend why Devon County Council should have put this land forward as a potential development site when they</p>

	<p>know it will destroy a productive County Farm at a time when agriculture nationally and locally needs to be supported and encouraged.</p> <p>c) On the 6 April 2021 the Devon Liberal Democrats set out in their manifesto a number of priorities. One of the priorities was ‘Made in Devon’ in which Councillor Alan Connett stated "<i>At a time when we need to support our economy and agricultural sector, we see the farms as a <b>vital part of the county council</b> and a way of helping farmers to progress in the business. <b>We will keep the farms.</b></i>" Given that Markham’s Farm is a well-recognised and successful County Council dairy farm, we find it inconceivable that a proposal has been put forward that will destroy it.</p>
1.4	<p><b>Housing</b></p> <p>a) There is no demand from within the Parish of Shillingford St George for a housing development of this enormous scale or size.</p> <p>b) The site is isolated from any current local community. The A30 completely divides the site from Alphington and the northern part of the site is approximately half a mile from Ide. This means that residents will have to travel to use any local services.</p>
1.5	<p><b>Health and Wellbeing</b></p> <p>a) Markhams Lane is used extensively by walkers and cyclists from nearby Exeter who are attracted by its totally rural nature and the extensive views of the city. The proposed development would utterly destroy this pleasant environment and would be a great loss to residents of the city and surrounding area.</p> <p>b) The plan says that; ‘High standards of design will create places of quality where residents can lead healthy, happy lives.’ It doesn’t mention the healthy, happy lives of present residents being wrecked.</p>
1.6	<p><b>Access, Transport and Connectivity</b></p> <p>a) The proposed site is separated from existing local communities and has very poor connectivity via narrow lanes. There is no easy access route to Ide and it is separated from Alphington by the A30. This means that there will be a considerable increase in vehicular traffic using already congested roads</p> <p>b) The development will result in yet more cars going into Exeter using Alphington Road or unsuitable narrow roads through villages as an alternative.</p> <p>c) The site does not have adequate public transport nearby.</p>

	<p>d) It is not right to state that a bus stop is within a certain distance of a development when that applies only to the closest point of a development.</p>
1.7	<p><b>Employment and Economy</b></p> <p>a) There is no reference in the plan to any additional employment opportunities. It is therefore assumed that people will be expected to travel either into Exeter or other local areas for work. This will place increased pressure on existing transport links.</p> <p>b) Likewise, there is no reference to additional services such as shops so again people would presumably be expected to travel to such facilities.</p> <p>c) The development would result in the loss of a number of agricultural jobs.</p>
1.8	<p><b>Infrastructure</b></p> <p>a) Using the UK average number of people per household of 2.39 the 727 houses proposed for this site would result in an additional 1,737 people moving into the area. Health services in the locality are already fully stretched and the development would put even more extreme pressure on the existing health service provision from the Ide Lane surgery and local hospital. The plan makes no reference to additional health service provision being provided.</p> <p>b) We note that current primary school provision would be inadequate to support the size of development proposed and a new facility would be required. Where is this proposed school to be sited?</p> <p>c) It is recommended in the draft plan that a 'hybrid scenario' is proposed allowing proportional growth of the defined rural villages i.e. those with at least a basic level of service provision without overburdening them. A 'defined settlement' is a settlement within Teignbridge which has at least a basic level of services including either a school or shop. The Markham's Farm site does not have direct connection to a 'defined settlement'.</p>
2.	<p><b>PEAMORE</b></p>
2.1	<p><b>Natural Environment and Landscape</b></p> <p>a) The site is rural in character and is being actively farmed. It also contains Peamore House which is a nationally important designated heritage asset protected as a Scheduled Monument. The proposed housing development would totally destroy the setting of Peamore House and the surrounding countryside.</p>

- b) The current Teignbridge District local plan for the period ending 2033 designates Areas of Great Landscape Value which are defined as:-

‘Areas of high landscape quality with strong distinctive characteristics which make them particularly sensitive to development. Within ALGVs the primary objective is conservation and enhancement of their landscape quality and individual character.’

The following plan is exacted from the official Teignbridge local plan and shows that the site is in an AGLV which is denoted by the blue hatching shown below.



- c) The Peamore site lies within the Exe Estuary Special Protection Area (SPA), Dawlish Warren Special Area of Conservation (SAC) 10km Zone and the Dawlish Warren SAC 10km Recreation Zone. The southern tip of the site lies within the South Hams Special Area of Conservation (SAC) Greater Horseshoe Bat Landscape Connectivity Zone.
- d) The site is also close to Shillingford Wood and Shillingford Plantation ancient woodland, and Peamore Lake Other Site of Wildlife Interest (OSWI) (Lake with tall herb vegetation and secondary broadleaved woodland). Trood Other Site of Wildlife Interest (OSWI) (Broadleaved woodland and semi-improved grassland) lies adjacent to the site and an Unconfirmed Wildlife Site (UWS) lies within the site to the South of Peamore House. The site contains habitats for various protected species including Cirl Bunting, Bats, Dormice and Great Crested Newt.
- e) The Peamore site is isolated from any existing settlements and separated from the SWE1 allocation by the A30, contributing to the further erosion of the rural character of the landscape and reinforcing the urbanising effects of the major road network. Residential development could be conspicuous from the road users. Its presence would be an erosion of the rural setting of

	<p>Exeter.</p> <p>f) Planning permission for a summerhouse in the garden of Peamore House was refused because of not conforming to the character of the house which is an extremely important property and has been described as, 'one of the most pleasant seats in the neighbourhood of Exeter'.</p>
<p>2.2</p>	<p><b>Historic and Built Environment</b></p> <p>The proposed development would destroy the setting of Peamore House which is a nationally important designated heritage asset protected as a scheduled monument.</p>  
<p>2.3</p>	<p><b>Land Use</b></p> <p>The proposed site is predominantly high quality productive agricultural land which would be totally destroyed if it was to be developed for housing.</p>
<p>2.4</p>	<p><b>Housing</b></p> <p>a) There is no demand from within the parish of Shillingford St George for a housing development of this enormous scale or size.</p> <p>b) The site is isolated from any current local community and separated from Exeter by the A30 and split in two by the A379.</p>

2.5	<p><b>Health and Wellbeing</b></p> <p>a) The proposed Development would utterly destroy rural character of the area and would be a great loss to local residents and the city as a whole.</p> <p>b) The plan says that; ‘High standards of design will create places of quality where residents can lead healthy, happy lives.’ It doesn’t mention the healthy, happy lives of present residents being wrecked.</p>
2.6	<p><b>Access, Transport and Connectivity</b></p> <p>a) The proposed site is separated from existing local communities and has very poor connectivity other than by car. This means that there will be a considerable increase in vehicular traffic using already highly congested roads.</p> <p>b) The A379 is one of the main routes into and from Exeter and would not be able to accommodate the increased traffic without significant improvement works. There are no safe crossing points over the A379 between the developments.</p> <p>c) The site does not have adequate public transport nearby and access to a bus stop would require crossing the very busy A379.</p> <p>d) It is not right to state that a bus stop is within a certain distance of a development when that applies only to the closest point of a development.</p>
2.7	<p><b>Employment and Economy</b></p> <p>a) There is no reference in the plan to any additional employment opportunities. It is therefore assumed that people will be expected to travel either into Exeter or other local areas for work. This will place increased pressure on existing transport links.</p> <p>b) Likewise there is no reference to additional services such as shops so again people would presumably be expected to travel to such facilities.</p>
2.8	<p><b>Infrastructure</b></p> <p>a) Using the UK average number of people per household of 2.39 the 933 houses proposed for this site would result in an additional 2,229 people moving into the area. Health services in the locality are already fully stretched and the development would put even more extreme pressure on the existing health service provision from doctors surgeries and the local hospital. The plan makes no reference to additional health service provision being provided.</p>

	<p>b) We note that current primary school provision would be inadequate to support the size of development proposed and a new facility would be required. Where is this proposed school to be sited?</p> <p>c) It is recommended in the draft plan that a ‘hybrid scenario’ is proposed allowing proportional growth of the defined rural villages i.e. those with at least a basic level of service provision without overburdening them. A ‘defined settlement’ is a settlement within Teignbridge which has at least a basic level of services including either a school or shop. The Peamore site does not have direct connection to a ‘defined settlement’.</p>
3.	<p><b>Final Comment</b></p> <p>The Parish Council has held a public meeting and is aware that many residents of the Parish are extremely unhappy with these proposals and are likely to have commented individually, via the designated form, via email or by letter. The Council would expect to see evidence that all such comments as well as those presented in this document, have been taken seriously and have influenced the final decisions of TDC in the next version of the Local Plan Review. The Parish Council will be more than happy to discuss these representations at the appropriate stage of the Consultation.</p>