

Exeter
City Council

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Date: 6 August 2021

Dear Sir/Madam

RE: Teignbridge Local Plan Review (Part 2) Site Options Consultation

Thank you for the opportunity to comment on the site options consultation for the Teignbridge Local Plan. This letter provides the response of Exeter City Council. It should be noted that the response has not yet been considered by the Council's Executive. This will take place in September 2021. The response has been discussed by lead Councillors.

The response is split into a series of sections covering various topics.

The duty to cooperate

There are a number of duty to cooperate matters identified in the Teignbridge Local Plan Site Options document. The City Council considers that the following matters are of relevance to the relationship between Teignbridge and Exeter. Most of these are identified in the consultation document.

- The collective response to the climate emergency including through the Devon Carbon Plan;
- Development impact on European designated sites;
- Development strategy and cross boundary mitigation;
- Landscape impact;
- Employment strategy;
- Transport strategy;
- Education strategy;
- Leisure, sports and cultural provision;
- Healthcare provision; and
- Coastal change.

The proposed Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge offers the potential to explore these matters more comprehensively across the wider area. We look forward to discussing these issues further through evidence and strategy as our respective plan-preparation progresses.

Development strategy

The City Council notes the proposed development strategy for Teignbridge and the inclusion of continued development on the edge of Exeter with the potential to accommodate a further 1,800 homes. It will be vital to continue engagement with the City Council relating to potential developments proposed in this area. Habitat mitigation, landscape impact, infrastructure delivery and wider discussions on housing and employment strategy will be matters requiring further discussion and strategic approaches going forwards.

It should be noted that the development strategy for Exeter is currently set out in the Core Strategy and the Liveable Exeter programme. These documents identify the need to focus development at sustainable locations in the city centre and a series of brownfield sites. As well as enabling sustainable development and minimising the need to travel, development in these locations will also support the protection of the landscape setting area of the city. On this basis, there would be concerns regarding proposals for development on areas of land which, although in Teignbridge, provide part of the landscape setting for the city.

Through the Liveable Exeter programme and, in time, the emerging Local Plan, the City Council is proposing to bring forward significant development in the south west of the city, including at Water Lane and Marsh Barton. The impact of these developments alongside potential site options in Teignbridge on the edge of the city will need to be planned for strategically, recognising cross-boundary impacts.

Employment provision

A key consideration will be coordinated thinking regarding employment provision in Exeter and the fringe of the city in Teignbridge. Additional residential development proposed at Marsh Barton will have an impact on the availability of employment space in Exeter and alternative space will be required to accommodate some of these existing employment uses. Sites which provide an opportunity for further employment development in Teignbridge, close to the south western edge of Exeter would be a welcome strand to wider employment strategy. Such sites would need to be in an appropriate location close to the city, be of a scale to provide sufficient space to viably support the regeneration of Marsh Barton and would need efficient access to the strategic road network. Economic evidence, including the Greater Exeter Economic Development Needs Assessment and the emerging Exeter employment study should support this strategic thinking going forwards to recognise the cross-boundary, functional relationships in the area.

Looking specifically at some of the emerging evidence, Exeter is likely to see potential growth in key transformational sectors such as data analytics, green technology and digital communications, sectors which now form vital elements of the economic development strategy for the city. On this basis, it is considered that there are opportunities for accommodating complementary sectors such as distribution on the proposed employment areas south west of the city in Teignbridge.

Transport provision

If development sites on the edge of Exeter are allocated within the Teignbridge Local Plan, continued joint working with Exeter City Council and Devon County Council should help to ensure that appropriate transport provision is made to mitigate development impact. This work will need

to take account of development proposals in the Liveable Exeter programme and the emerging Local Plan to ensure a coordinated position. Continued discussions should ensure that the concepts set out in the Exeter transport strategy are delivered to promote active and sustainable travel to minimise car trips, help support air quality improvements in the city and play a key role in achieving carbon targets.

Depending on which sites on the edge of Exeter are included in the next stage of the Teignbridge Local Plan, it is likely that in some cases off-site transport provision may be required within the city to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from developments located in Teignbridge.

Education provision

If development sites on the edge of Exeter are allocated within the Teignbridge Local Plan, it is vital that continued joint working with Exeter City Council and Devon County Council takes place relating to education provision. This will help to ensure that appropriate education provision is made in a coordinated way to take account of development proposals in the Liveable Exeter programme and the emerging Local Plan alongside those developments sites in Teignbridge on the Exeter fringe. Depending on which sites on the edge of Exeter are included in the next stage of the Teignbridge Local Plan, it may be that in some cases off-site education provision may be required within the city of Exeter to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from development in Teignbridge.

Leisure, sports and cultural provision

The development site options on the edge of Exeter are likely to have impacts on the leisure, sports and cultural facilities in the city because they will look to Exeter for various forms of leisure provision. Given the scale of the residential site options and, in some cases, the limitations caused by local topography, it is unlikely that significant provision could be made on site. Further discussion will therefore need to take place between the Councils to develop an appropriate strategy for providing playing pitches, built leisure and cultural provision. Discussions will need to consider the type of provision required and funding arrangements.

Development sites on the edge of Exeter

The consultation document identifies three residential and three employment sites on the edge of Exeter. All six site options will link functionally with Exeter and therefore further discussions will be required to address a variety of cross-boundary issues. It will be important for development to provide an appropriate mix of uses and local facilities to enable a degree of self-containment whilst acknowledging the functional links with Exeter and the need to travel sustainably to access jobs and higher order services. Development must also be located in a way which protects the landscape setting of Exeter. Each of the sites are addressed in turn below.

Markham's Farm

Development at Markham's Farm is likely to have an impact on the landscape setting of Exeter because of the rising land and ridgelines within the site which contribute to the landscape sensitivity of the area and the existing local designation as an area of great landscape value. Although the setting is already to some extent eroded by the location of the A30, the landscape setting area of Exeter abuts the A30 and the administrative boundary with Teignbridge. The potential for landscape impact and for the site to form a single development in the wider rural area would need to be minimised with careful management. If development were to take place, development on the ridgeline should be avoided in order to minimise landscape impact on the setting of the city.

Development at Markham's Farm is likely to increase the demand for trips into Exeter through Alphington and on Alphington Road. In order to manage this impact in terms of increased journey times, residential amenity and air quality, a comprehensive transport strategy is required to maximise the use of active travel and public transport including park and ride. This should take into account the likelihood of long-term development at Marsh Barton alongside potential transport improvements which Marsh Barton could make in future. Joint work with Devon County Council will be vital here taking account of the existing Exeter transport strategy and emerging Local Cycling and Walking Infrastructure Plan.

Education will be an important consideration for this site. Given the location just to the west of the city, education provision will need to be considered in the context of the existing pupils in Exeter but also development proposals at Marsh Barton and Water Lane as included in the Liveable Exeter programme. Working with Devon County Council, a comprehensive education strategy is required to consider the various development proposals in the wider area. If off-site education was provided, this would need to be funded from the development.

The site options information in the consultation document sets out that local public open space and play areas should be provided on site at Markham's Farm. Existing ECC play areas in the vicinity of the site have limited capacity for additional use or expansion to cater for additional demand and would be too far to be reasonably accessible for residents of these sites. Given this context and the scale of development proposed, on site provision is supported. This should include full play provision for all age groups (i.e. LAPs, LEAPS, NEAPs and MUGAs) following as a minimum standard the recommendations of the Fields in Trust guidance 'Beyond the Six Acre Standard'. Looking more widely, provision of skate facilities should be considered on site; the nearest facilities within Exeter are located at Flowerpots more than 3 km away and there are no plans by ECC to provide skate facilities any closer to the proposed sites. Further consideration will need to be given to the potential for on-site playing pitch provision at Markham's Farm. Additional provision in Exeter within close proximity to the site is not currently planned and therefore a lack of more local provision would lead to a greater need to travel. Depending on active travel routes improving access, pitches could potentially be improved to enable them to accommodate additional demand, however this would be subject to appropriate financial contributions being made by development in this location.

Peamore

Peamore offers the potential for further development to the south west of Exeter. It will be important to provide for a mixture of uses in the area including housing and employment (the adjacent employment site option is noted).

Although the area is located within an area of great landscape value, it is separated from the built up area by the A30 and the land is generally rolling as opposed to steeply rising from Exeter. On this basis, development here would have less of an impact in landscape terms than the other site options. However, the prominent location of Peamore when viewed from the A38 and A379 means the site is visible as a gateway to Exeter. On this basis it will be important to ensure a high quality and distinctive development to promote the status of Exeter as a key regional centre.

A comprehensive package of transport measures will be vital to support the delivery of development at Peamore and the adjacent employment site option. Joint work with Devon County Council will be vital here taking account of the existing Exeter transport strategy. Provision should also build on the strategic highways and active travel provision which is currently being delivered at South West Exeter. Off-site transport provision may be required within the city of Exeter to help mitigate development impact. Appropriate funding would need to be sought from the development towards its delivery.

Education provision for the site would need to be considered in the context of the existing provision in Exeter and the all-through school currently being delivered at South West Exeter. Working with Devon County Council, a wider, comprehensive education strategy is required to consider the various development proposals in the wider area. If off-site education was provided, this would need to be funded from the development.

The site options information in the consultation document sets out that local public open space and play areas should be provided on site at Peamore. Existing ECC play areas in the vicinity of the site have limited capacity for additional use or expansion to cater for additional demand and would be too far to be reasonably accessible for residents of these sites. Given this context and the scale of development proposed, on site provision is supported. This should include full play provision for all age groups (i.e. LAPs, LEAPS, NEAPs and MUGAs) following as a minimum standard the recommendations of the Fields in Trust guidance 'Beyond the Six Acre Standard'. Links to the provision being made at South West Exeter should also be considered. Looking more widely, provision of skate facilities should be considered on site; the nearest facilities within Exeter are located at Flowerpots more than 4 km away and there are no plans by ECC to provide skate facilities any closer to the proposed sites. Further consideration will need to be given to the potential to provide on-site playing pitch provision at Peamore. This should take into consideration the provision being made at South West Exeter. Additional provision in Exeter within close proximity to the site is not currently planned and therefore a lack of more local provision would lead to a greater need to travel. Depending on the improvement of active travel routes, pitches in Exeter could potentially be improved to enable them to accommodate additional demand, however this would be subject to appropriate financial contributions being made by development in this location.

Atwells Farm

Landscape impact is a key concern regarding this site. Previous landscape studies covering this wider area identify that the ridge in this location represents a clear physical and visual barrier for Exeter while there are long views to the site from the west and south west. Together, these factors mean that the site plays an important role in the landscape setting of the city and has a very high visual sensitivity. There are clear linkages between the site and the designated landscape setting area of Exeter which it abuts. Development on this site would negatively impact this landscape

setting and undermine one of the key strands of the development strategy for Exeter – the need to protect the landscape setting of the city.

The topography at Atwells Farm is also likely to have an impact on the potential to deliver high quality, functional active travel on the site; the steep slopes are likely to deter significant mode share for walking and cycling. If these modes do not play a significant role, car travel is likely to be the main mode of travel to and from the site. If this were to be the case, there would be negative impacts on the local highway network including relating to air quality. Were development to take place at Atwells Farm, off-site transport provision may be required within the city which would need to be funded by development.

Education provision would need to be considered in the context of a wider strategy for the city paying particular attention to the emerging development sites from the Liveable Exeter programme. If off-site education was provided, this would need to be funded from the development.

The site options information in the consultation document sets out that local public open space and play areas should be provided on site at Atwells Farm. Existing ECC play areas in the vicinity of the site have limited capacity to cater for additional demand and would be too far to be reasonably accessible for residents of these sites. If the site is included for further consideration, on site provision is therefore supported. This should include LAPs, LEAPS and a MUGA. Furthermore, given that there is limited additional development expected in the local area, an absence of appropriate existing NEAP standard play areas within a reasonable walking distance of the site, and due to the challenging local topography, we would also expect a NEAP to be provided on site.

In summary, the site is not considered appropriate for development and the City Council would not support its inclusion in the Local Plan.

West Exe Business Park, Peamore

As already mentioned, there is a need for further strategic collaboration to cover employment strategy for the city and its fringes. Notwithstanding the need for this work, it is considered that this site could play an important role within this wider strategy.

The site is located on the south-western edge of Exeter and would function as an extension of the existing Peamore industrial estate. It would offer an appropriate location for employment development to meet potential future demand on this side of the city derived from the long term redevelopment proposals for Marsh Barton as set out in the Liveable Exeter programme. This location would be particularly suitable for light industry and logistics which would complement the emerging employment sectors which are set to grow in Exeter.

The site is located in close proximity to the A38 for trips to and from the south. North bound access to the M5 would benefit from improvements and should be considered in the context of long term transport strategy for the wider area including the adjacent Southwest Exeter allocation. The City Council supports the proposals for a park and ride on the A379 corridor. If provision could not be made here, an alternative would need to be investigated elsewhere on this corridor.

The site is located at an important gateway location for the city and therefore development should be of a high quality including appropriate landscape and infrastructure.

Brown's Farm, Splatford

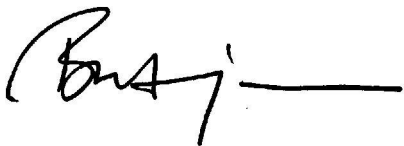
The site is located within 5km south of Exeter and therefore could meet some of the potential future demand on this side of the city derived from the long term redevelopment proposals for Marsh Barton as set out in the Liveable Exeter programme. However, the site is not adjacent to the city and has constraints which limit the scale of development which could be delivered on site. Transport access to and from the A38/M5 to the north and towards the south is fairly direct however access from the southbound A38 is poor and would need improving. Given the location of the site is some distance from larger settlements, accessibility by non-car modes is likely to be challenging. These issues could affect the attractiveness of the site for investment. If the site were to come forward it may be appropriate for light industry and logistics which would complement the emerging employment sectors in Exeter.

Opposite Exeter Court Hotel, Kennford

The site is located within 5km south of Exeter and therefore could meet some of the potential future demand on this side of the city derived from the long term redevelopment proposals for Marsh Barton as set out in the Liveable Exeter programme. However, the site is not adjacent to the city which could affect its attractiveness to businesses. Transport access to and from the A38/M5 to the north and towards the south is fairly direct, however access from the southbound A38 is poor and would need improving. Given the location of the site is some distance from larger settlements, accessibility by non-car modes is likely to be challenging. If the site were to come forward it would be appropriate for light industry and logistics which would complement the emerging employment sectors in Exeter.

I hope these comments are helpful in progressing the Teignbridge Local Plan and we look forward to working with you on the various matters set out in this response. If you have any questions please do not hesitate in contacting me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Bindu Arjoon', followed by a horizontal line.

Bindu Arjoon
Deputy Chief Executive