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Email to: paul.jeffrey@exeter.gov.uk

Dear Mr Jeffrey

Outline Planning Application Ref: 15/0641/01 Land between Shillingford Road and Chudleigh Road (known as Aldens Farm West)

The Alphington Village Forum committee has examined the above and has noted serious shortcomings with this application. We **object** to this planning application on the following grounds.

1. The Planning, Design and Access Statement has not adequately explained or justified the development proposed for the site

According to the **Government's online Planning Practice Guidance**, the Design and Access Statements "provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users. Design and Access Statements can aid decision-making by enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal. The level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long."

Exeter City Council's Development Brief for the site (para 3.2) states that "A Design and Access Statement must be submitted with any planning application, setting out the design concept and principles (including the approach to sustainable design) that have informed the proposals.

This requirement, however, has not been met.

The applicant's Planning, Design and Access Statement does not explain -

- the existing site constraints
- the design concept and principles
- how the number of 'up to 116 dwellings' was arrived at
- what the density is likely to be. It is therefore unknown how the development will relate to the density of neighbouring housing.
- how much open space is likely to be provided and roughly where it is. It is therefore unknown how future open space will relate to existing hedgerows and trees.

Furthermore, the applicant's Planning, Design and Access Statement is not proportionate to the complexity of the application. Only pages 19 to 29 concern design and access matters. These, however, convey little information and certainly do not explain "how the proposed development is a suitable response to the site and its setting".

2. The Planning, Design and Access Statement has had insufficient regard to the Exeter City Council Development Brief for the site and consequently fails to meet its requirements

The applicant's Planning, Design and Access Statement (para. 6.5) states incorrectly that "much of the Development Brief is not relevant" at the outline planning application stage.

In fact, **Exeter City Council's Development Brief** for the site (para. 1.1) states that "This Brief is a Supplementary Planning Document and therefore a material consideration in the determination of any planning application(s) proposing to develop the site."

Furthermore, the Development Brief (para. 1.2) states that "This Brief is aimed at those involved in planning and designing any new development at the site. It also provides those with an interest in the project - neighbours, local residents and any other interested parties - with guidance on the issues that will be considered during the planning process."

The lack of regard for the Development Brief has resulted in its requirements for the following, either being inadequately considered or not being met -

- density of housing
- open space and landscape
- community facilities
- bus service
- biodiversity
- cycle and walking routes
- carbon energy

3. Information submitted with the planning application is out of date

According to the **National Planning Policy Framework (para. 165)** "Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area".

The following documents, however, are not up to date -

- Preliminary Ecological Appraisal and Extended Phase 1 Habitat Survey (June 2012)
- Bat Surveys (July to Sept 2012)
- Dormouse Survey (Dec 2012)
- Arboricultural Survey (Feb 2013)

4. No Green Infrastructure Framework has been provided

Exeter City Council's Core Strategy Policy CP19 requires this development area to have a Green Infrastructure Framework and **Policy CP17** requires the development to "set the built form within high quality and diverse green spaces".

Exeter City Council's Development Brief for the site (para. 3.1) requires the site to be developed as a place which "provides a net gain in biodiversity and avoids damage to existing trees, hedgerows and associated species, incorporating these within a landscape and green infrastructure framework".

The essential point about a Green Infrastructure Framework is that it is provided as the framework within which development proposals are worked out. But no such Green Infrastructure Framework has been provided. This has meant that it is not possible to see how (and whether) existing hedgerows, trees, grassland and green lanes will be incorporated into any green areas to be provided in the new development.

5. Inadequate open space will be provided

The applicant's Landscape and Visual Assessment states (para 4.5) states that the South West Masterplan - "notes that existing green infrastructure does not currently feature strongly around Alphington with limited existence of Public Open Space, located to the north of the village, and play areas only located to the north and east".

This planning application proposes the building of housing on Alphington's green fields. This will only worsen the lack of public open space in Alphington. No proposals are made for the amount and general location of public open space which would show how this situation could be avoided.

6. There will be a net loss of biodiversity

Exeter City Council's Core Strategy Policy CP17 requires the development to "retain and enhance the biodiversity of the site and adjacent areas."

Exeter City Council's Development Brief for the site (para. 3.1) requires that the site must be developed as a place which provides for a net gain in biodiversity and avoids damage to existing trees, hedgerows and associated species ..."

The Bat Survey and Dormice Survey point to the value of the hedgerow network for these European protected species. Loss of hedgerows and lighting and disturbance from the new housing will adversely affect bat and dormice species.

There will also be a loss of a field of semi-natural grassland.

The above would result in a net loss of biodiversity on the site and no evidence has been submitted to show that this could be addressed by mitigation and compensation habitat.

7. Housing densities (dwellings per hectare) are unknown

Exeter City Council's Development Brief for the site (para. 3.2) states that "Recent developments on the edge of Exeter have achieved an average net density of around 35 dph. In order to respond to the character and appearance of neighbouring residential areas, the topography of the site and its proximity to a Scheduled Ancient Monument, those areas along the northern and southern boundaries of the site must be developed at around 20 dph. Higher densities will be appropriate towards the centre of the site".

The applicant's Planning, Design and Access Statement does not give any information about housing densities. Housing densities are measured on the net site area (i.e. after open space, hedgerow buffers, community facilities and main roads are deducted from the gross site area). We have worked out that at Aldens Farm West there will be a density of 28 dph on the gross site area (116 dwellings ÷ 4.104 gross site hectares), but the density on the net site area is likely to be much larger and could be above the 35 dph average net density mentioned in the Development Brief. Current information is therefore inadequate.

8. There is no provision of community facilities

Exeter City Council's Development Brief for the site (para. 3.1) states that the site must be developed as a place which "includes high quality community facilities for the new residents, comprising a site for a new health centre/doctors' surgery, recycling facilities, allotments and public open space."

There is no indication in the planning application that these facilities are to be provided.

9. Cycle and walking routes will be inadequate

Exeter City Council's Core Strategy Policy CP17 states that development will "create a network of safe and convenient green routes that bridge the barriers presented by transport infrastructure and promote healthy living and a sense of well-being."

Exeter City Council's Development Brief for the site (para 3.3) states that "Shared-surface pedestrian and cycle paths must be provided to maximise permeability through the site."

However, little information is provided on how the development will provide such routes.

10. There is no proposal to provide an extended A bus route

The applicant's Planning, Design and Access statement (para. 8.7) states "This application will support sustainable means of Transport, both via design led encouragement to support walking, cycling and bus use and the S106 will provide funds to assist the County Council in administering travel plan initiatives."

We would have expected a clear statement as to whether an extended A bus route will be provided or not. 'Support' and 'encouragement' are empty words; they are not proposals.

11. Air Quality is likely to worsen

The traffic flows predicted in the air quality assessment differs substantially from the traffic assessment. This, therefore, brings the findings of the air quality report into question. This is particularly important as Church Road and the northern section of Chudleigh Road already exceed or are just below the legal acceptable limits under the Air Quality Standards Regulations 2010 for 70 days a year.

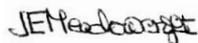
12. There has not been a co-ordinated approach to the planning of development on both sides of the Exeter/Teignbridge administrative boundary.

This lack of co-ordination is evident in -

- the lack of provision for community facilities
- the lack of a clear picture of where the open space will be located and how existing hedgerows and trees will be integrated within the new development
- the lack of consideration of traffic generation from the Bovis development in the calculation of road junction capacity
- the lack of an integrated approach to cycleway and bus route provision

We object to the planning application for the reasons given above. Please contact me if you require further clarification.

Yours sincerely



Juliet Meadowcroft
Chairwoman Alphington Village Forum

cc.

Leader of Exeter City Council, Councillor Pete Edwards
Leader of Devon County Council, Councillor John Hart
Deputy Leader of Exeter City Council, Rachel Sutton
Councillor Roy Hill Councillor Rob Crew
Councillor Suaad George Councillor Paul Bull
Councillor John Harvey Councillor Phil Bialyak