

From: Martyn Smith [REDACTED]
Sent: 08 January 2023 10:26
To: Planning Policy
Subject: Draft local plan - Feniton sites.

Categories: Reg.18 consultation

Dear Planning Policy Team,

We would like to comment on the Sustainability Appraisal that is a supporting document to the Draft Local Plan. Our comments are solely in respect of the judgements made for the sites identified through the HELAA process at Feniton (pages 453 - 461).

1. Biodiversity. Whilst it is acknowledged that there are no formal biodiversity “designations” at the identified sites these areas have rich natural hedgerows and other small scale coppices that provide important wildlife habitats. The fields in question are not all continuously improved grassland as stated. There is regular crop rotation which at times sees these fields used for spring and winter wheat, maize, potatoes and other feed crops, the cover of which also provide wildlife habitat. It is simply wrong to state that the biodiversity impact of house building on these areas is uniformly neutral. With the possible exception of the playing fields, the scores should be negative.

2. Landscape. The residents of Feniton would not agree that house building on the open land that surrounds the village would be neutral in landscape terms. It is not just the rising land approaching the ridgelines that is important to the setting of the village. The wide open flatter land, particularly to the north, is highly valued. It is easy to see why this flatter, easily developed land has been brought forward by landowners and developers in the HELAA process but it does not mean that its development would have a neutral landscape impact - far from it. The section headed “Reasons for alternatives being rejected” at the end of the Feniton assessment states that sites Feni-08, 09 & 11 are “open and exposed in landscape terms”. Development at the scale proposed by site promoters would also be highly visible from the Scheduled Ancient Monument of Hembury Fort to the north. Sites should be scored negative.

3. Historic Built Environment. No comment

4. Climate Change / Carbon Emissions. The community of Feniton is sick of hearing the myth that the existence of a railway station in the village somehow makes it a sustainable location for more development. It is the frequency and convenience of public transport services in a community that help make it sustainable, not the mere existence of a railway station. The reality is that the line between Exeter and Honiton is single track with a diminishingly remote prospect of any part of it being dualled. Therefore the frequency of services at Feniton are limited and indeed have reduced in recent years to allow more trains to stop at Cranbrook.

The Parish Council’s most recent survey of resident mode of transport to work showed that 98% of residents didn’t use the train. The Government funded Office for Road and Rail published, in November 2022, annual station use statistics for all stations in the UK. It showed that on average 6 people got on or off each train that stopped at Feniton. Hardly an overwhelming sign of its popularity, particularly as those figures are boosted annually by the thousands attending the Beautiful Days festival at Escot Park.

There is no effective commuter service from Feniton even assuming all the jobs people wanted to access were in Exeter City Centre or Honiton, which they are clearly not. The vast majority of the Feniton workforce uses a car or a van. Added to which the village has a poor and infrequent bus service, one small convenience store, few leisure facilities and no medical facility meaning that more car journeys on inadequate country lanes are generated for residents to meet their daily needs. Developing any of the sites in the HELAA will inevitably add to the car-borne population and the sustainability assessment should acknowledge this and score double negative against each site.

Incidentally, the comment about all sites being linked by good quality footpaths is completely inaccurate.

5. Climate Change Adaptation. It is helpful that the existing flooding issues in Feniton are acknowledged but the commentary completely understates the issue. The flood alleviation works will help alleviate drainage at the east of the village but will not solve the village’s problems in total and certainly has not been designed to cope with any of the sites identified for possible housing in the draft plan.

Cheriton Hill to the north and east of Feniton directs large amounts of surface water toward the village. The site Feni-11 in particular acts as a sponge for a lot of this run-off preventing even worse impacts on the village. Because of the history in Feniton, it was the subject of an Environment Agency trial in 2010 using specialised sub-soiling ploughing techniques to increase water retention. It was featured on local television news programmes at the time. Added to this, the combined foul and surface drainage system in the village cannot cope with further households and the added surface water run-off from new development, irrespective of developers’ promises of SUDS compliant designs. The sustainability analysis should score double negative for the Feniton sites.

6. Land Resources. It is understood that Feni-09 is also Grade 1 agricultural land and should be scored double negative too.

7. Water Resources. No comment

8. Homes. No comment

9. Health and Well Being. No comment

10. Access to Services. The range of services available in the village is small. Car ownership is high for a reason. Most people have to travel some distance to Ottery, Honiton or Exeter to meet their daily needs. The primary school is at capacity and children are already bussed or taken by taxi to alternatives. The school is on a very restricted site and cannot easily be expanded. Any new families moving into homes on the proposed sites would face the same issue. Again the commentary mentions the railway station but see the comments under section 4 above. At the very best, the score in the sustainability appraisal should be neutral.

11. Jobs and Employment. Feniton already has the lowest jobs to workers ratio in the District. Again the commentary talks about the rail link as if this is a major advantage to accessing jobs. It is not.

12. Town Centres. No comment

13. Connectivity and Transport. For the reasons stated above, the score should be neutral at best for all sites and more realistically negative. To remake the point, it is the existence of frequent and convenient rail services that make a location sustainable not the mere presence of a station. If services cannot be improved because of the single track infrastructure it is false to claim a place is sustainable. The reality is that the vast majority of journeys from Feniton involve private vehicle access to the A30.

Reasons for alternatives being rejected. It is good that the Draft Local Plan does not have a strategy for large scale growth at Feniton. For the reasons stated above Feniton should be treated like any other Tier 4 settlement in the Local Plan's Settlement Hierarchy and accommodate only modest growth to meet local need. It has to be realistically accepted that given the services and jobs available locally, any new housing development in Feniton will produce more car-borne journeys on inadequate lanes. Such development should be located to avoid additional traffic in the village as vehicles inevitably travel toward the A30 to access services and employment.

We hope that the Sustainability Report can be amended to reflect these points. We are very happy to discuss them further.

Kind regards,
Martyn Smith,
Chairman of Feniton Parish Council
on behalf of the Parish Council Local Plan Working Group