

From: [REDACTED]
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To: Planning Policy
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Categories: Reg.18 consultation

I wish to comment in respect of sites identified in Feniton as having the potential for mass housing development. I am shocked that the evaluation for these sites seems unaware of the conjoined inquiry by the Planning Inspectorate of 2014, in which three separate sites, to host a total of 262 new houses, was rejected. (References: APP/U1105/A/13/2191905; 2197001; 2197002; 2200204.) The reasons behind the Planning Inspectorate's decision to reject appeals by these three developers remain relevant in respect of all the sites featured on page 453 of your report.

Biodiversity

While it is correct to state that there are no 'designated biodiversity sites' impacted, the rural nature of Feniton means that the land surrounding the village provides a rich habitat for a wide variety of species. The statement that all the sites 'comprise of improved grassland' is simply untrue. I fail to see how the report evaluates all these sites as 'neutral/zero', when a visual inspection would confirm the rich diversity adhering to the topography of this countryside.

Landscape

'Feniton sits in a natural bowl between higher ground to the west and east, and shallower rising slopes extending north and south ...' (Conjoined Inquiry, page 9.) Accordingly proposed developments would encircle a rural community, significantly 'looking down' upon the village, and spoiling the setting of Feniton itself. (For example, the degradation of the visual appeal of the western approach into Feniton by the proposed Strategic Land Partnerships application of 2014 was singled out by the Planning Inspectorate as a negative feature.)

I agree that from a landscape point of view, Feni_05 offers an opportunity for improvement. However the other sites should all be scored negative.

Climate change carbon emissions

This is an egregious travesty of a response. Both ignorant and irresponsible, it repeats the fallacious claims of previous developers, and makes no effort either to look to historical precedent or current reality. The mere presence of a railway station at Feniton does NOT de facto make the village 'sustainable'. The Conjoined Inquiry devoted pages 18-21 to the issue of Feniton's sustainability. It was very clear that more mass housing would degrade the quality of life for villagers, would risk turning Feniton into a dormitory town, and lead to a dramatic increase in road traffic. Since 2014, access to public transport has deteriorated, train services to Exeter have reduced in order to accommodate stops at Cranbrook, and Feniton, already a community heavily reliant upon cars, has become all the more dependent upon private transport. The narrow roads that surround the village would become all the more choked in the event of more housebuilding. (Indeed, Wainhomes' application APP/U1105/A/13/2200204 got round the impact of increased traffic emerging onto a single lane by the simple expedient of ignoring it altogether in favour of assessing the impact of increased traffic onto a different road on the other side of the village!)

While a previous Planning Inspector determined that an approved housing development found Feniton to be 'a sustainable location', the Conjoined Inquiry Inspector added that 'it would be incorrect ... to equate this with a

finding that any and all further residential development must necessarily be sustainable too' (page 20, my emphasis). The Sustainability's report at this point is a travesty. Scores for all sites should be negative.

Climate change adaptation

The report acknowledges that flooding will remain an issue for the village for the foreseeable future, but is complacent about the implications of future build. The landscape 'bowl' in which Feniton is situated will always channel water to the centre of the village. Concreting over greenfield sites will simply make things worse. Feniton_05 is lower than Ottery Road, which floods frequently to the extent that raw sewage emerges in neighbouring properties. Current flood mitigation measures will help current problems. They won't deal with problems emanating from new build. Scores for all sites should be negative at this point.

Health and wellbeing

It is telling that the only negative comment about the train service in Feniton is that it can be quite noisy, as opposed to its diminished role in servicing local needs. Anyone moving into Feniton is going to require a car to get around, given the very limited range of services accessible on foot. (N.B. that the pop up post office is in Old Feniton, is only open for a few hours a week, and requires access via unlit narrow roads without a pavement.) The village primary school is already over capacity. Scores for all sites should be negative at this point.

Connectivity and transport

The report's statement that 'the presence of a railway station accounts for all sites being afforded a positive score' underlines just how crude and unsophisticated this exercise has been. This sentence, and related sentiments, will be seized upon by developers as evidence that EDDC supports mass housing development in Feniton. It is important to stress that the 'country lanes' in Feniton are mostly single track (see above), and that ALL the second choice sites reviewed in the Sustainability Appraisal report are accessed via such roads. . The allocation of a positive score to all sites should be, at the most optimistic, neutral.

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