

Planning, Transportation & Environment

Lucombe House
Topsham Road
Exeter
Devon
EX2 4QD

24 September 2020

Dear Sir/Madam

Re: Farringdon Neighbourhood Plan Submission Version

Thank you for the opportunity to comment on the submission version of the Farringdon Neighbourhood Plan. Devon County Council is supportive of the Neighbourhood Plan for the area and its aims to provide the community's vision for the future.

The County Council does not have any objection to the plan, but has a small number of comments reiterating points made in our response to the pre-submission version regarding highways and waste planning which are attached below in the schedule of comments.

If you have any queries regarding the comments made, please do not hesitate to get in touch.

Yours faithfully,


Mike Deaton
Chief Planner

No.	Section	Comment
Highways		
	Policy Farr5 Self-Build and Custom-Built Dwellings Page 22	Given the opportunities for sustainable travel are limited in this area we would suggest that a requirement for electric vehicle charging points at any new/ custom build is included within Policy Farr5.
Minerals and Waste		
	Inset Map for Policy Farr6 Page 25	DCC as the WPA welcomes the reference now included in para 9.2 to the Devon Waste Plan's allocation in Policy W6 for energy recovery within the business park. However, it is noted that our previous comments to the pre-submission version of the plan, dated 25 June 2020 and attached below, regarding the Inset Map for Policy Farr6 have not been taken into account. The purple line on the inset map provided alongside Policy Farr6 showing the 'extent of employment site' excludes two units which have been permitted and built on the NE part of the plan. These should be included as they form part of the existing site.
	Paragraph 9.11 Page 27	Policy Farr6 seeks to prevent an outward expansion of business or commercial development and the identified boundary of the site is based on Policy VP05 of the East Devon Villages Plan. This is in the context of business and commercial development and the supporting text in para 9.11 expands on this point. Whilst this is noted, the Neighbourhood Plan should acknowledge at this point (para 9.11) that the Waste Plan allocation in Policy W6 (site W6C in the policy) extends beyond this purple line boundary and therefore the principle of additional waste development in this location is established.

Planning, Transportation & Environment
County Hall
Lucombe House
Topsham Road
Exeter
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EX2 4QD



25 June 2020

Dear Sir/Madam

Re: Farringdon Neighbourhood Plan Pre-Submission Version

Thank you for the opportunity to comment on the pre-submission version of the Farringdon Neighbourhood Plan.

The County Council has a small number of comments to make regarding highways and minerals and waste which are attached below in the schedule of comments.

If you have any queries regarding the comments made, please do not hesitate to get in touch.

Yours faithfully,



Mike Deaton
Chief Planner

No.	Section	Comment
Highways		
1.	Policy Farr6 Existing Business and Commercial Areas Page 27	As set out below, some of the text included in this policy could be clarified: d) using ‘adverse effect on living conditions’ as opposed to just ‘effect’; e) clarifying what is meant by an adverse impact on parking provision; e) including public transport as this is arguably the most realistic option for sustainable travel; g) listing g) ‘promote access on foot or by bicycle’ above ‘ e) not have an unacceptable adverse impact on the transport network and parking provision’ would seem more appropriate.
2.	Policy Farr11 New Community Facilities and Services Page 32	c) the local road network should read local highway network or local transport network.
3.	Policy Farr12 Walking and Cycling Routes Page 35	We would recommend that this policy references strengthening links between footpaths and public rights of way to public transport routes and facilities, for example at Farrington Cross.
Minerals and Waste		
4.	Paragraph 4.9 Page 9	We support recognition of the role of the Minerals and Waste Plans in paragraph 4.9, however currently the document makes no reference to the Waste Plan’s allocation in Policy W6 for energy recovery within the business park. This should be acknowledged and could be incorporated to paragraph 9.2 which discusses the waste uses on site.
5.	Inset Map for Policy Farr6 Page 28	The purple line on the inset map provided alongside Policy Farr6 showing the ‘extent of employment site’ excludes two units which have been permitted and built on the NE part of the plan. These should be included as they form part of the existing site. Furthermore, the purple line boundary on this part of the plan should align with that for Policy W6C of the Waste Plan, as the principle of additional development in this location is established in this area. As currently drafted, the County Council as Waste Planning Authority objects to Policy Farr6 as it is in conflict with Policy W6 of the Devon Waste Plan which has been attached to this response for reference.

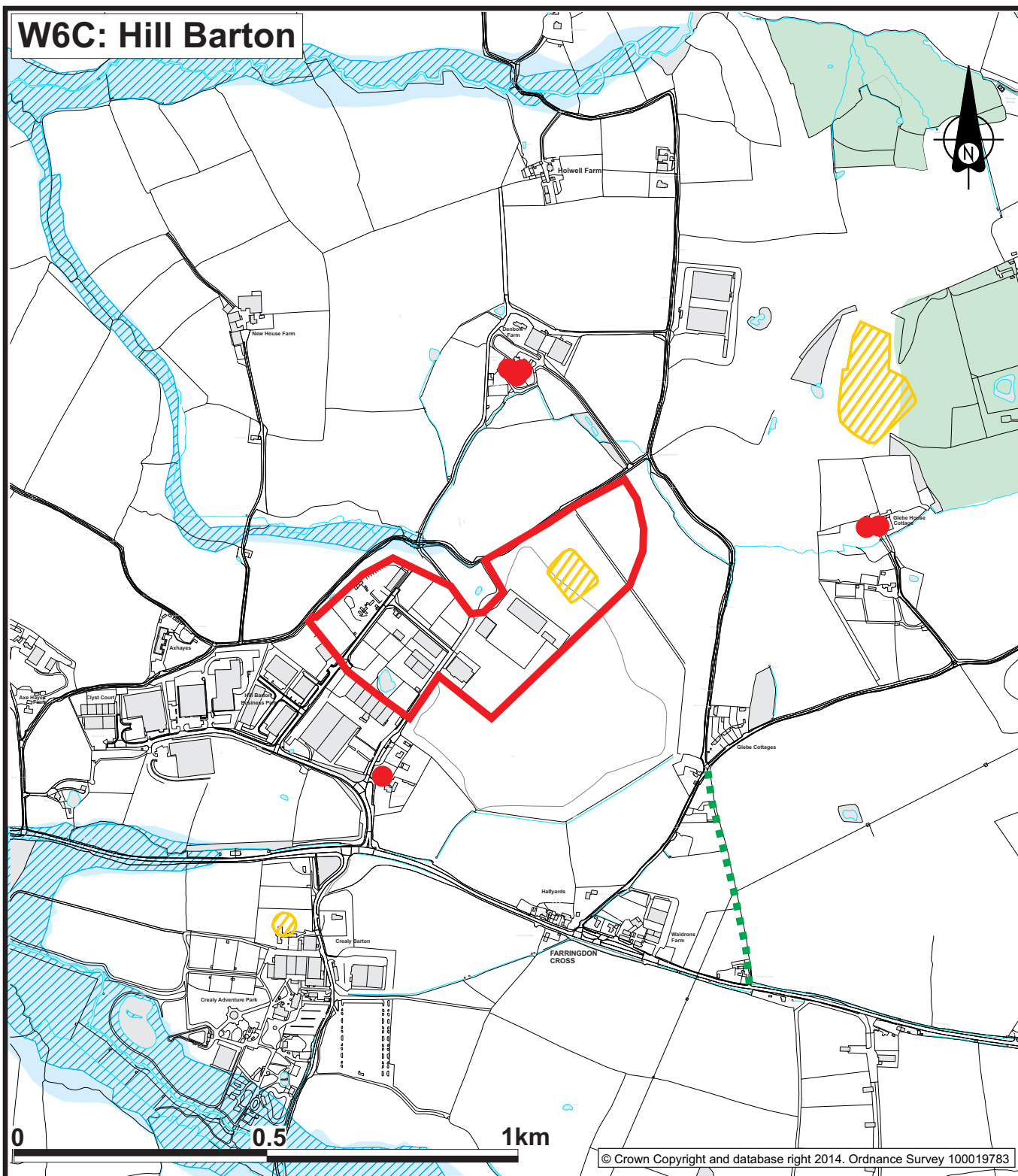
W6C: Hill Barton

Site Details	
Site Reference:	Hill Barton
OS Grid Reference:	3004 0911
District:	East Devon
Parish:	Farringdon
Total site area (Ha):	15.3
Current land use(s)	The industrial estate has a number of existing and permitted waste uses, including inert landfill and recycling, in vessel composting, waste transfer and gasification. Other uses within the estate include tarmac and concrete production, plant hire, grain store, vehicle mechanics.
Historical land use(s)	Agricultural
Adjacent land use(s)	Agricultural, with residential properties and a tourist attraction in the vicinity
Relevant planning history:	There are a number of waste facilities already located on the site.








The following table shows the issues and constraints present at the site identified through a thorough site appraisal. These issues pose a risk of significant harm and require addressing and mitigation measures through the planning application process.

Human health and amenity	There are 54 residential properties and businesses within 500m of the site, together with further properties on the A3052 that may be affected by traffic generated by the site. Planning permission has also been given for the construction of an additional 11 houses within 350 metres of the boundary of W6C. Development proposals should demonstrate that impacts from noise, dust, air pollution, odour and vibration, including cumulative impacts arising from other development, can be controlled and, if necessary, adequately mitigated. Visual impacts may be significant for those surrounding the site, and sufficient screening and a suitable scale should be proposed.
Land use constraints	Pre-application discussions should be held with Exeter International Airport to ensure that their operations are not adversely affected. Potential impacts may be caused by lighting, craneage during construction, and the risk of increased bird activity from landscaping, building design and surface water management measures.
Transport	The A3052 and adjoining highway network is likely to be able to accommodate development at this location with little or no modification to existing infrastructure. However, constraints at Junction 30 on the M5 and at the A376/A3052 roundabout at Clyst St Mary in peak times will need to be addressed through the Transport Assessment. In the event of that Assessment identifying any residual severe impact at these junctions, the need for mitigation will need to be addressed in discussion with Devon County Council and/or the Highways Agency.

Biodiversity	<p>The site is 4km from the East Devon Pebbled Heaths SAC and 4km from the Exe Estuary SPA, and Habitats Regulations Assessment will need to address any indirect air quality or water impacts at the planning application stage.</p> <p>While it is possible to develop the site without impact on Greater Crested Newts and Dormice, these species may be present within swales, ditches and hedgerows within the site and further survey work and, if necessary, identification of mitigation measures may be required.</p>
Land and soil	<p>The site is listed as potentially contaminated as a result of current waste management use at the site, and further assessment is required</p>
Landscape	<p>The landscape and visual impacts vary across the site. There is a high-medium to low landscape sensitivity due to potential to significantly harm the intrinsically rural landscape character that is more intact and of a higher quality further to the north. However, the artificial earth bunds and large buildings within the neighbouring Business Park degrade the landscape quality towards the south.</p> <p>Additionally, the site has a high-medium visual sensitivity due to the visual receptors, which include a few scattered rural dwellings, the few PROW users and from the nearby AONB. To minimise landscape and visual impact, any development within the currently open field will require mitigation for visual impact including strengthening hedgerows for screening, sensitive consideration of building heights and design and avoidance of access through surrounding rural lanes. Any development should address these impacts and achieve mitigation through a Landscape and Visual Impact Assessment.</p>
Historic Environment	<p>Regard should be taken to potential impacts on the setting of listed buildings in the vicinity of the site, and to the non-designated heritage assets contained on and around the site. The eastern part of the site contains a non-designated heritage asset described as "Undated rectangular enclosure south west of Denbow Cross". There is also a heritage asset within 500m of the site boundary towards the south at Crealy described as "Prehistoric ring ditch north of New Hayes". Within 1km there is a further heritage asset recorded, described as, "Prehistoric rectilinear, single ditched enclosure and rectilinear enclosure north of Glebe Copse." A programme of archaeological evaluation and recording is required.</p>
Water	<p>Development proposals should be accompanied by a surface water drainage strategy to ensure no increase in runoff into watercourses, avoid exacerbation of surface water flooding and reduce the risk of pollution being carried from the site.</p> <p>As the site for development is likely to exceed 1ha, a Flood Risk Assessment will be required, which should include evidence of historic flooding.</p>



NOTE: Exeter Airport Consultation Area for all development covers the whole site

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|---|--|---|----------------------------|
|  | Site Boundary |  | Flood Zone 3 |
|  | Unconfirmed Wildlife Site |  | Flood Zone 2 |
|  | Undesignated Historic Environment Feature |  | Listed Buildings |
| | |  | Public Right of Way |