



JLP Councils note with further details in response to Inspectors' Note EXC14

1. In their note, reference EXC14, the Inspectors requested information with respect to air quality, posing six questions. The Councils responded, reference EXD49 (and associated documents EXD49 A to F) on 16th March 2028.
2. During the Hearings the Councils advised that further to that response details would be provided with respect to major development that is either a proposed allocation, commitment or completion (within the plan period) that would be likely to have an impact on the Totnes Air Quality Management Area and the Ivybridge AQMA.

Totnes

3. Sites have been included where they are within or adjacent to the AQMA and there is no clear access / egress other than through the AQMA. Sites to the west of Totnes and at Dartington Village have not been included since there is a route to the A38 and other major destinations beyond without passing through the AQMA; and, therefore, it is not considered to be likely that more than 30% of traffic generated by the development would pass through the AQMA.
4. To re-iterate the point made in the initial response of the Councils to the Inspectors' questions, modelling is considered to be of limited value due to the complexity of development patterns in the area; and since the location and nature of exceedance is known, as are the solutions.
5. The approach of the Councils (in this instance South Hams District Council) is a strategic one, with modelling undertaken for development through the development management process. This level of assessment is considered to be commensurate to the scope and detail of the JLP and is commensurate to the requirements of paragraph 124 of the NPPF.
6. The following details provide an account of how the likely impact on air quality has been taken into account for sites with planning permission and how it will be

taken into account and addressed for allocated sites that have yet to be granted planning permission.

TTV26 Land at KEVICC

7. Land at KEVICC is allocated for residential-led development with enhanced education and sports facilities. Provision is made for in the order of 130 new homes.
8. No application has been received and formal pre-application discussion has yet to commence.
9. It is not possible to predict with accuracy the likely number of vehicle trips generated since this will be a function of the type and nature of the housing mix. As the development is predicted to come forward late in the plan period, it is not possible to state with certainty what that mix will be.
10. It can, however, be assumed that there would be an impact on the AQMA. Accordingly the proposed allocation policy requires any planning application to demonstrate how air quality had been taken into account and to set out an appropriate strategy to avoid and mitigate for any impact on the AQMA. This could include:
 - a Travel Plan
 - marketing initiatives to promote non car based travel;
 - provision of a commuted sum towards improving public transport;
 - provision of a commuted sum towards the setting up of a car club and car sharing initiatives;
 - provision of a commuted sum towards the promotion of walking and cycling initiatives;
 - provision of a site wide parking management system;
 - new and improved pedestrian links; and
 - new and improved cycle links from the site joining the National Cycle Network 2 route
11. Given the location of the site close to town and its services and with good pedestrian, cycling and public transport links; and given that housing development would be both adjacent to and linked to redevelopment of the school it is considered that substantial scope exists to minimise the impact on air quality. Furthermore the development would be late in the trajectory, when the use of electric vehicles will have advanced significantly. Crucially, it is considered that the involvement of the school in designing and implementing a travel plan allows for considerable scope to reduce vehicle movements during the 'school run' hours, when emissions are typically at their highest.

TTV27 Baltic Wharf

12. Land at Baltic Wharf is allocated for a mixed-use redevelopment, including residential, marine / employment and commercial uses. Provision is made for in the order of 190 new homes and 3,300 square meters of employment floorspace (Use Class B1 and B2).
13. Planning permission has been granted (SHDC reference 56/1939/10/O & 56/0104/13/RM) for the whole development, but it has not been completed in its entirety. A reserved matters application was approved (SHDC reference 56/0104/13/RM) for 93 dwellings and, subsequently the residential element has been completed. Almost all units are occupied.
14. For further details see:
<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/101892>
<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/130110>
15. The Transport Assessment for the outline application predicted daily trip generation and Council Officers subsequently considered the magnitude of the likely impact on air quality. The following measures were considered appropriate and were secured through conditions and a s106 Agreement:
- The applicant shall contribute through the Section 106 Agreement £200,000 for Travel Plan measures and £300 000 for strategic improvements;
 - Travel Plan secured via S106 agreement; the Draft Travel Plan includes:
 - Contribution of £50 000 towards the appointment of a Travel Plan Co-ordinator for Totnes;
 - Appointment of a Travel Plan Co-ordinator for Baltic Wharf;
 - Marketing initiatives to promote non car based travel;
 - The provision of a commuted sum towards improving public transport;
 - The provision of a commuted sum towards the setting up of a car club and car sharing initiatives;
 - The provision of a commuted sum towards the promotion of walking and cycling initiatives;
 - Provision of a site wide parking management system;
 - New and improved pedestrian links including from the north to the south boundaries, Moat Hill to Dart Trail and site entrance to the boatyard;
 - New improved cycle links from the site joining the National Cycle Network 2 route; and
 - Dedication of Sustrans cycleway arrangements currently on licence.
16. A cap on parking space provision at site is secured through planning condition to reduce reliance on car based travel / likelihood of attracting vehicles to the site.

TTV28.1 Dartington Lane

17. Provision for 45 houses.

18. Dartington Hall Trust, the landowner, is engaged in pre-application discussion with SHDC and the community. The Trust seeks to bring forward the development as a custom build project. The Trust is committed to development that is in keeping with and furthers their sustainability objectives.

19. For further details see <https://www.dartington.org/our-work/the-plantation/>

20. It is considered that significant scope exists to reduce the need to travel by car given the close proximity to good cycle, pedestrian and public transport links to Totnes and Dartington village.

TTV28.2 Great Court Farm

21. Provision for 75 houses.

22. Outline planning permission was granted for 75 houses (SHDC reference 03/2163/14/O).

23. For further details see

<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/140149>

24. Construction has commenced following the approval, in 2017, of reserved matters.

25. Air quality assessment, transport assessment and travel planning undertaken as part of the DM application. To mitigate the impact the s106 agreement secures:

- off-site highway Improvement works in accordance with the recommendations of the Highways Officer including Traffic Regulation Orders and a contribution per dwelling of £1643.24 towards the Totnes Strategy set out by the County Highway Authority;
- a contribution of £62,000 towards off-site improvements to the footpaths within the Bridgetown Corridor to improve the pedestrian and cycling links from the site into the town centre; and
- provision of bus and cycle vouchers for every dwelling totalling £300 per dwelling and the provision of a travel and welcome pack for new residents; and
- Implementation of the Travel Plan.

TTV28.3 Transition Homes Totnes

26. Provision for 27 houses.

27. Permission has been granted (SHDC reference 2927/15/FUL) for 27 houses with outline for the erection of a Community Building and commercial building (B1 use).

28. For further details see

<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/154395> and <https://www.transitiontowtotnes.org/transition-homes/>

29. The application was not supported by an Air Quality Impact Assessment. Officers at the Council, however, used modelling for the ATMOS (TTV28.5) and other developments in Totnes to determine the likely impact on air quality. In this respect it is notable that the site has good access to pedestrian, cycle and public transport routes to Totnes Town Centre and Dartington Village; and that the mix of uses seeks to reduce the need to travel.
30. To reduce and mitigate vehicular trip generation the development is the subject of a Green Travel Plan that includes measures to facilitate alternatives to personal car use and ongoing monitoring and evaluation. Alternatives to personal car use would include secure cycle storage (2 spaces per dwelling and visitor spaces adjacent to the community building); helping residents establish a shared electric bike scheme; at least one car club vehicle on site; working with residents to establish car sharing (separately from the car club); lift sharing; on-site car parking limited to one space per residence plus additional visitors spaces; providing desk space in the Community Hub building to encourage home working. The effectiveness of the Green Travel Plan will be evaluated annually by the Residents Group, and also by Transition Homes CLT (Community Land Trust) who have the right (in consultation with residents) to make any necessary changes to ensure the plan objectives were met.
31. Welcome and Travel Packs to be provided with £300 vouchers for sustainable travel (bus/cycle) secured via S106 agreement.
32. A site management plan to include details of parking arrangements, the one way system and waiting times to demonstrate how parking on the site will be managed will be prepared under a planning condition.

TTV28.4 Riverside

33. Provision is made for what is the residual employment element (3,200 square metres of employment floorspace) of a long standing mixed use allocation.
34. Permission was granted (SHDC reference 03_56/0447/12/O) for mixed use development 'comprising about 100 dwellings; up to 5350 sq m of office / light industrial floorspace; up to 60 units of extra care accommodation and associated communal facilities; and up to 350 square metres of floorspace for community use.
35. For further details see:
<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/120988>
36. The residential element (100 C3 units) has been completed and is predominantly occupied (application reference 03_56/1419/14/RM)
37. For further details see
<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/141333>

38. The site lies in a central location with good pedestrian access to the Totnes Town Centre. Consideration of the application included an Air quality and transport assessment. Appropriate measures to reduce and mitigate impact on air quality were secured:

- £127,000.00 transportation contribution secured via S106.
- Footpath/cycle link to Parkers Close secured by planning condition.

39. Application 4165/17/FUL for the 68 bed care home is awaiting decision. For further information see

<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/174165>

40. Transport assessment and travel planning was submitted with the application. Council Officers will seek Electric Vehicle charging points as a planning condition, DCC as Highway Authority has made no objection to the application.

TTV28.5 ATMOS

41. Provision for 62 houses.

42. The site is the subject of a successful Community Right to Build Order (SHDC reference 0440/16/CRB). Reserved matters applications have, however, yet to be received.

43. Further details see

<http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/160497> and <http://atmostotnes.org/>

44. The development proposal is for mixed use including over 3.5 hectares of employment land capable of supporting 'over' 99 homes (includes C2), and a range of community facilities.

45. The site is immediately adjacent to the main railway station in South Hams (Totnes), which is easily accessible on foot. The Town Centre can be accessed using existing pedestrian and cycle routes. Development would enhance and develop the sustainable access routes and also to create additional opportunities for visitors coming to Totnes by rail to access the town more easily. It is proposed that a landing stage is developed on the River Dart to enable people to access the site via the river. In the area of the landing stage a new activity/civic space will be created, complementing those already in existence at Steamer Quay and the Plains.

46. The Travel Plan supports low-emission transport options for all users and includes provision of a pool of all-electric vehicles available for all site users as part of a zero carbon car-share scheme.

47. Responding to the aim for the site to be self-sufficient in energy from renewable sources, the Energy Centre will bring together the electricity

generated from the hydro power on the weir to the North-west corner of the site and power generated from PV panels on the roofs of buildings. Biomass boilers located within the Energy centre will provide a renewable supply of heat to the site through a District Heating Network.

48. Air quality and transport assessment has informed the decision making process. A key finding of the Air Quality Assessment was that 'Impacts on NO2 concentrations were predicted to be negligible at eight sensitive receptors and slight at five sensitive receptors. Impacts on annual mean PM10 concentrations were predicted to be negligible at all sensitive receptors. These represent worst-case locations and therefore it is unlikely that any other receptors would be significantly affected by the proposed development'.

49. The Travel Plan is secured by planning condition.

TTV28.6 Ashburton Road

50. The proposed allocation carries forward the employment element of a long standing mixed use allocation where the housing element (50 houses) has been completed with all properties occupied.

51. The planning application reference is 14_56/2246/13/F. For further information see <http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/122819>

52. Air quality and transport assessment informed the DM process. The development was considered to be acceptable subject to a 'Totnes Strategy' contribution of £1,648.64 per dwelling (£82,432.00), which was secured through a s106 agreement. The money will contribute to the National Cycle Network between Dartington and Totnes, widening footways along Ashburton Road and improvements to the Redworth Junction.

53. The development includes provision of a footpath / cycleway through the site to a point where a bridge can cross the stream area into the Plantation and then link in further to the national cycle network beyond.

54. Implementation of a Travel Plan is secured by planning condition.

55. Delivery of the employment element (the proposed allocation) would result in 1,200 square metres of B1b, B1c and B2 uses where these are compatible with the location and neighbouring uses.

Cumulative impacts

56. The details provided above for each site illustrate that the JLP seeks to allocate land where there is good access to pedestrian, cycle and public transport links and that measures to enhance these have been requirements where planning permission has been granted. The measures facilitate existing as well as new residents having easy access to alternative modes of transport to the private car.

57. Further measures to reduce and mitigate impacts have and will be required through Travel Plans, with key initiatives being sustainable travel vouchers, car sharing and infrastructure for electric vehicles.
58. The most likely future scenario is that traffic will stay at a similar level to existing, with some additional traffic linked to development offset by changing travel patterns. It is considered that the high degree of self-containment (see T18A, paragraph 4.1.5); high number of self-employed workers, including many home workers (see T18A, paragraph 4.1.7); a culture of sustainability; and good cycle routes support this stability and provide a sound foundation for the successful implementation of the Clean Air Strategy.
59. The standard approach is an assumption that there will be an increase in ultra-low emission vehicles, hybrid vehicles and electric vehicles. The approach, therefore, is to promote the provision of infrastructure to support and promote take up of these technologies as well as enhancing public transport and improving provision of and access to cycle and footpaths. S106 Agreements typically require developers to give Sustainable Travel Vouchers to householders and that Green Travel Plans set out measures to further the objective of modal shift.
60. The main focus is to address the marginal failure for NO₂ at Bridgetown Hill, Totnes, where there are more pedestrians, cyclists / residents affected; although the measures also address the more significant failure at True Street junction. Through implementation of the existing Air Quality Strategy and the Clean Air Strategy, to be adopted later this year, the measures will also address impact on air quality in the wider Totnes AQMA as well as areas outside this designation. The approach is one of stabilisation in the short term with emissions levels reducing significantly in the longer term.

Ivybridge

61. Sites have been included in the centre and east of Ivybridge. Sites to the west of Ivybridge have not been included since there is a route to the A38 and other major destinations without passing through the AQMA. Consequently it is considered that less than 30% of the traffic generated by the respective developments would pass through the AQMA.
62. To re-iterate the point made in the initial response of the Councils to the Inspectors' questions, modelling is considered to be of limited value due to the complexity of development patterns in the area. The location and nature of exceedance is known, as are the solutions.
63. The approach of the Councils (in this instance South Hams District Council) is a strategic one, with modelling undertaken for development through the development management process. This level of assessment is considered to be commensurate to the scope and detail of the JLP and is commensurate to the requirements of paragraph 124 of the NPPF.

TTV8 East of Ivybridge

64. Land to the east of Ivybridge is allocated for a residential led mixed-use development. Provision is made for in the order of 540 new homes and 4,600 square metres of employment space (Use Classes B1).
65. Permission has been granted to Barratt David Wilson to construct 222 houses (SHDC reference 27_57/1347/14/F). This site is under construction (Lucerne Fields). For further information see <http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/141620>
66. Planning permission has been granted to Hannick Homes to construct 198 homes, a neighbourhood centre and business uses (SHDC reference) 57/2472/14/O. For further information see <http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/141488>
67. The third and final parcel for development is controlled by Taylor Wimpey, with a planning application anticipated in 2018.
68. Transport Assessment has infirmed the first two decisions and will be required for the third.
69. The strategic approach has been to bring forward development at this location to the east of Ivybridge where good access exists to pedestrian and cycle links as well as public transport. A railway station is within walking distance. The mix of uses seeks to limit the need to travel by car into the centre of Ivybridge (and through / affecting the AQMA).
70. For the BDW site s106 secures further measures that seek to reduce and mitigate for emissions:
- £75,000 on site renewables (delivery on site);
 - £20,000 air quality improvement (this could be used to part fund the removal of parking from Western Road)
 - Off-site cycle improvements (Woolcombe Lane) and Stage 2 Designer's Review
 - £5000.00 towards amending the speed limit on Godwell Lane and adjacent roads;
 - £5000.00 towards Traffic Regulation Orders
 - Design / review (road safety audit) for a footpath link to Filham Park. Subject to that conclusion, BDW to undertake the required works up to a maximum value of £100k.
- Welcome Pack and Travel Pack
71. For the Hannick Homes site s106 secures further measures that seek to reduce and mitigate for emissions / traffic congestion:
- New roundabout on Exeter Road;

- a through road linking from Exeter Road via the TW and BDW sites and under the A38 to provide an additional alternative route to St Peter's Way when traveling through the Town centre when driving to Plymouth;
- Provision/upgrading of footways / cyclepaths; and
- Travel Plan measures

72. It is not possible to predict with accuracy the likely number of vehicle trips generated through the final parcel of development since this will be a function of the type and nature of the housing mix. It can be assumed that there would be an impact on the AQMA. The proposed allocation policy requires a planning application to set out an appropriate strategy to mitigate for any impact on the AQMA. This could include:

- a Travel Plan
- marketing initiatives to promote non car based travel;
- electric vehicle charging points
- provision of a commuted sum towards improvement to the flow of traffic along Western Road (including removing parking and traffic regulation order);
- provision of a commuted sum towards improving public transport;
- provision of a commuted sum towards the setting up of a car club and car sharing initiatives;
- provision of a commuted sum towards the promotion of walking and cycling initiatives;
- a through road linking from Exeter Road via the BDW site and under the A38 to provide an additional alternative route to St Peter's Way when traveling through the Town centre when driving to Plymouth;
- new and improved pedestrian links; and
- new and improved cycle links from the site joining the National Cycle Network route

TTV9 Land at Filham

73. Land to the east of Ivybridge, at Filham, is allocated for in the order of 200 new homes. The strategic approach is to bring forward development at this location to the east of Ivybridge where good access exists to pedestrian and cycle links as well as public transport. A railway station is within walking distance. The mix of use seeks to limit the need to travel by car into the centre of Ivybridge (and through / affecting the AQMA)

74. A planning application is anticipated in 2018. Transport assessments undertaken as part of preparatory work with road improvements proposed in the draft masterplan. The initial finding of assessment by the applicant / developer is that no major highway work or significant impact with respect to air quality is anticipated. This has not yet been verified by the planning authority or Highway Authority.

75. It is not possible to predict with accuracy the likely number of vehicle trips generated, however, since this will be a function of the type and nature of the

housing mix. It can be assumed that there would be an impact on the AQMA. The proposed allocation policy requires a planning application to set out an appropriate strategy to mitigate for any impact on the AQMA. This could include:

- a Travel Plan
- marketing initiatives to promote non car based travel;
- electric vehicle charging points
- provision of a commuted sum towards improvement to the flow of traffic along Western Road (including removing parking and traffic regulation order);
- provision of a commuted sum towards improving public transport;
- provision of a commuted sum towards the setting up of a car club and car sharing initiatives;
- provision of a commuted sum towards the promotion of walking and cycling initiatives;
- provision of a site wide parking management system;
- new and improved pedestrian links; and
- new and improved cycle links from the site joining the National Cycle Network route

76. Given the location of the site close to town and its services and with good pedestrian, cycling and public transport links.

TTV11.1 Stowford Mill

77. Provision for 97 homes and 2,330 square meters of employment floorspace (no net increase)

78. Planning permission has been granted (SHDC reference 27/1336/15/F). Construction has started. For further information see <http://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/151107>

79. Air quality and transport was considered in detail through the Development Management process. The s106 secures £20,000.00 for a traffic restriction order and £300.00 per dwelling for Sustainable Travel Vouchers and a Welcome Pack and Travel Plan for each new dwelling. The planning permission includes provision for electric vehicle charging points.

Cumulative

80. The details provided above for each site illustrate that the JLP seeks to allocate land where there is good access to pedestrian, cycle and public transport links and that measures to enhance these have been requirements where planning permission has been granted. The measures facilitate existing as well as new residents having easy access to alternative modes of transport to the private car.

81. Further measures to reduce and mitigate impacts have and will be required through Travel Plans, with key initiatives being sustainable travel vouchers, car sharing and infrastructure for electric vehicles.

82. A significant positive measure will be the removal of car parking on Western Road where, in tandem with a traffic regulation order, this will improve the flow of traffic and reduce the incidence of stationary vehicles contributing to emissions, particularly during peak hours. Replacement car parking will be provided on land owned by SHDC.
83. Through implementation of the existing Air Quality Strategy and the Clean Air Strategy, to be adopted later this year, the measures will also address impact on air quality outside the designation. The approach is one of stabilisation in the short term with emissions levels reducing significantly in the longer term.