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Joint Local Plan Team
Plymouth City Council
Ballard House
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8th January 2018

Dear Joint Local Plan Team,

R.E. Written Statement on the Plymouth and South West Devon Joint Local Plan, 2014-2034

I wish to submit the following written hearing statement in relation to Matter 8 ‘Policy Area Strategies: Thriving Towns and Villages’ examining the soundness of the Plymouth and South West Devon Joint Local Plan (JLP).

It will be demonstrated that:

- two of the Air Quality Management Areas (AQMA) designated in the South Hams are close to areas are that being allocated in the JLP for large numbers of new houses, and
- the options included in the Air Quality Action Plans for these two areas, the A385 AQMA and Western Road AQMA, will lead to a worsening of air quality due to the number of additional vehicle movements arising from new developments in or near to these AQMAs, and
- given that TTV26 requires “An appropriate strategy to mitigate for any impact on the A385 Air Quality Management Area”, whilst TTV25 point 3 requires “Ensuring that all development, singularly or cumulatively, will not negatively impact on the ability of the relevant authorities to improve air quality within the A385 AQMA”, with the same being stated in the relation to the Western Road AQMA in TTV7, TTV8, TTV9, TTV10 & TTV11,
- it is likely that there will be challenge to developments in these areas due to the detrimental impact that they will have upon people living in these AQMAs (see relevant case law, for example: <https://www.airqualitynews.com/2017/11/14/planning-decision-upheld-after-air-quality-ruling/>),
- and as such the Joint Local Plan is overestimating the quantity of housing that is likely to be built in allocated sites within Dartington, Ivybridge and Totnes, which therefore indicated that the JLP will not be sound if it relies on the housing allocations included at present.

The Council’s draft Clean Air Strategy provides the following shortlist of options for the A385 AQMA, none of which will make a significant impact upon reducing the Annual Average Daily Traffic (AADT) flow in the AQMA, nor improving the air quality:

- “- Further studies are needed to determine what other improvements can be made to traffic flows on the A385, Devon County Council have signed up to carrying this work out in 2017. Once this further work has been carried out then a review of this AQAP will need to be carried out.
- However in the short term funding should be secured from developers to secure improvements to public transport signage, and to the pedestrian crossings in the town to off-set the impact of their developments.
- There is the potential for greater use of cycling for short regional journeys within Totnes and the immediate area, however the road network does not easily facilitate this, and therefore the Councils should facilitate a regional cycling strategy through a company such as Sustrans.”

At the time of writing the JLP, South Hams District Council had been informed by Devon County Council (DCC) that they would be undertaking a study in 2017 to determine what improvements could be made to traffic flows on the A385 to improve air quality in the AQMA. However, DCC has now decided not to undertake this study as they believe that infrastructure improvements will not be cost effective nor will they deliver adequate gains to address the air quality issues in this AQMA.

Moreover, of the actions included in the previous Air Quality Action Plan for the A385 AQMA, the only significant action implemented was a change to the Redworth Junction. And air quality in this AQMA has not improved since this change has been made, nor following other minor interventions. Indeed, the 2017 Air Quality Annual Status Report released in July 2017 states that, "The monitoring has shown no meaningful improvements in the air quality levels..."

Significant additional housing in both Totnes and Dartington will worsen the air quality, with the main shops, supermarket, secondary school and doctors surgery being situated very close to the A385 AQMA in Totnes. It is likely that the majority of journeys made by residents of these new developments in Dartington will be made by car along the A385 AQMA.

And proposals to make changes to the curbside parking along the Western Road AQMA in Ivybridge will not be sufficient to remove the need for that AQMA.

Moreover, page 4 of this latest Status Report adds that, "South Hams District Council anticipates that further additional measures not yet prescribed will be required in subsequent years to achieve compliance and enable the revocation of all of the AQMAs." This clearly indicates that the present plans will not address the air quality issues, which is killing local residents (a key indicator in Annex 2 of the JLP is "% deaths attributable to particulate air pollution").

The Air Quality Action Plans, as presently drafted, rely on contributions towards green travel vouchers and green travel planning, along with promoting green travel to new residents and for up to 10% of households being given access to electric vehicle installation points. However, whilst the SHDC Officer responsible for the Air Quality Action Plans has issued a standard recommendation since July 2017 requesting that a condition is placed on large scale developments such that they meet guidelines to require 10% of houses be given access to electric car charging infrastructure, few developments approved since that date have actually had this included as a condition. And this measure, set at just 10%, will lead to very little mitigation of the increased emissions of air pollutants from vehicles arising from additional development in and around the AQMAs.

It is clear that development in Dartington, Ivybridge and Totnes will negatively impact on the Local Authority's ability to improve air quality in the Western Road AQMA and the A385 AQMA. As such there will likely be challenges to future developments in and near to these designated areas. I therefore believe that including a large number of houses on allocated sites in or near to these AQMAs could leave the JLP being considered not to be sound.

Yours faithfully,



Cllr. John Green