

## **PARISH COUNCIL'S OBSERVATIONS REGARDING PLANNING APPLICATION FOR CONTAINER STORAGE IN FIELD OPPOSITE PETROL STATION ON A3052:**

We, **The Parish Council of Aylesbeare**, write with regard to the above planning application. It is incumbent upon us to identify and safeguard the countryside, retaining its distinctive character for the enjoyment of residents and visitors. We have reviewed the plans and know the location well. The Parish Council **does not support** application number **19/0100/FUL** and wishes to object in the strongest terms to the proposed development of this site/location.

To that end we make reference to the **East Devon District Council Local Plan**, together with the draft **Parish of Aylesbeare Neighbourhood Plan** and the **National Planning Policy Framework**:

A key objective of the Local Plan is to conserve the environment, the landscape, historic character, its wildlife, agriculture and natural resource value. Development on High Quality Agricultural Land (Grades 1, 2 and 3a) will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.

High Quality Land will be protected from development not associated with agriculture, respecting the intrinsic features that help define the character of rural East Devon.

It should have regard to the District Landscape Characterisation Assessment (LCA) and be appropriate for the location. Development in open countryside outside defined boundaries will be resisted.

(The site in question is Grade 2 land.)

These policies would be the starting point for consideration of any form of development within the Parish and EDDC's Planning Department should take full account of these policies where this application is considered.

### **FURTHER MATERIAL CONCERNS:**

#### **ANOB:**

The proposed development is situated in clear view, in open countryside, in what is considered to be the 'Gateway to The Jurassic Coast' and lying less than half a mile from the boundary of East Devon's Area of Outstanding Natural Beauty (ANOB).

"Neighbourhood planning consultations have revealed that communities across East Devon strongly support the protection and enhancement of East Devon's outstanding natural environment" and, "Many people choose to live within the area due to its setting and the surrounding natural environment." - EDDC Local Plan.

Remedial tree planting and screening will not reduce the visual impact of the site for many years to come.

#### **NEED:**

There is no demonstrable need of more self-storage. The district is already well served by several such facilities, none of which are operating to capacity. There are two large industrial/business parks within two miles of Oaklands Field that have the capacity to accommodate any future storage provision. The Applicant already has such an operation of approximately 126 containers (with ample room to expand?) at his Woodbury location.

#### **ACCESS/HIGHWAYS/SAFETY:**

The proposed access is almost opposite Oaklands Service Station, on the A3052 which is an increasingly busy and congested road with a 50 MPH speed limit. **This is an Accident Black Spot.** Accidents on this stretch of road, typically involve vehicles queuing to enter the garage or overtaking on what is a 'fast A road'. Increased traffic entering or emerging from the proposed development can only increase the risks to road users. This will be further exacerbated during holiday periods when traffic volumes multiply significantly.

## **RUN-OFF/FLOODING:**

Residents of Withen hamlet are already experiencing problems with the flooding of the brook which runs directly from Oaklands Field and down through the middle of the hamlet. This is noted by the Environment Agency on their Aylesbeare CP Surface Water Flood Map (copy attached). Any additional hard structures will only increase the rate of run off from the site. There have in recent years been incidents where properties have experienced flash-flooding. There is an ongoing issue with the erosion of stream banks and bed effecting several properties. The flow continues onto Perkins Village and Rosamondford with the potential to cause further problems. The Parish Council feels that a proper Flood Damage Assessment (FDA)/Flood Risk Assessment (FRA) would be appropriate at this time and refer again to the Local Plan section 22, which includes the following sections:

22.35 Remedial work may be required some distance from the application site. In such cases the developer will be expected to enter into a planning obligation to ensure that the required work is carried out. Developers will be expected to cover the costs of assessing surface water drainage impacts and of any appropriate mitigation works, including long term management.

22.36 Using Sustainable Drainage Systems (SUDS) to manage surface water has a number of benefits, such as improving water quality and the local environment. However, they also provide an important function in reducing the risk of flooding of homes and businesses, as well as adjacent or downstream properties, as a result of heavy rainfall. It is therefore a key consideration to look at the surface water flood mapping available and consider what drainage measures should be used. The Government's expectation is that sustainable drainage systems will be provided in new developments wherever this is appropriate.

## **EN22 - Surface Run-Off Implications of New Development:**

Planning permission for new development will require that:

1. The surface water run-off implications of the proposal have been fully considered and found to be acceptable, including implications for coastal erosion.
2. Appropriate remedial measures are included as an integral part of the development, and there are clear arrangements in place for ongoing maintenance over the lifetime of the development.
3. Where remedial measures are required away from the application site, the developer is in a position to secure the implementation of such measures.
4. A Drainage Impact Assessment will be required for all new development with potentially significant surface run off implications.
5. Surface water in all major commercial developments or schemes for 10 homes or more (or any revised threshold set by Government) should be managed by sustainable drainage systems, unless demonstrated to be inappropriate.

## **PARISH COUNCIL WOULD DRAW YOU ATTENTION TO THE FOLLOWING:**

1. The area of the existing storage building's roofing alone on this site already equates to that of at least ten homes.
2. 18/1187/AGR - Grant of Conditional Permission

Condition 4. Provision shall be made within the site for the disposal of surface water to ensure that there is no increase in the rate of surface water run-off from the site resulting from the development. (Reason: To protect water quality and minimise flood risk in accordance with Policy EN22-Surface Run-Off Implications of New Development of the New East Devon Local Plan 2016 and the guidance contained with the National Policy Framework.) ... Parish Council believes that this condition has yet to be met and would be fundamental to the proposed development.

## **HABITAT & POLLUTION:**

The Self-Storage Industry is entirely unregulated and little or no control can be exercised over what goes into these containers. A large percentage are used by small businesses (I e. Painters & Decorators, Industrial Cleaners, etc), any number of combinations of Hazardous (Toxic, Flammable) materials can find their way into them. Any spillage from this location could ultimately find its way into the Exe Estuary via Clyst St Mary and Topsham.

Light Pollution is also of concern; such a facility would invariably require Security and Access Lighting and this would need to be 24 hour, disturbing not only nearby residents but also native nocturnal wildlife. This area is characteristically one of the darkest parts of the local countryside. There are Owls and Bats resident about the site and a Deer run goes through it.

This area provides habitat to a range of native wildlife. With its proximity to nearby protected sites, the possibility of significant species on or near the development cannot be ruled out.

All of these would be disturbed by activity commensurate with the operation of such a facility.

Noise, metal container doors and vehicular, may also be a consideration and would certainly affect wildlife around the site.

## **IN CONCLUSION:**

Development on this site began in 2015 with the erection of a Hay Barn (15/0279/AGR) followed soon after by an improvement to the access (15/1605/FUL). Aylesbeare Parish Council was at that time supportive of this 'agricultural' activity. Under Permitted development a further farm storage building (18/1187/AGR) was approved in 2018. This did not go unremarked and concerns were raised about the possibility of a change of use and "creeping industrialisation". Whilst these concerns could not be taken into account at that time, it is now clear that they were not without substance. Parish Council is disappointed to now find an application for a material change of land use, from agricultural to commercial, which we believe is contrary to planning policies and of no benefit to the community.

Further to this, it comes to our attention that the original structure (15/0279/AGR) bears no resemblance to the approved "design and appearance", we can find no planning documentation relating to any variation. We are therefore in the process of raising an enforcement complaint in this regard and would ask that any current or future planning applications for this location be put on hold until the outcome of this matter is known.

If this application is to be decided by councillors. Please take this as **Notice** that we would like to speak at the meeting of the committee at which this application is expected to be decided. Please advise us of the date of the meeting as soon as possible.

Yours faithfully

**Aylesbeare Parish Council**