

**Notes in relation to planning application 1059/22/FUL  
Car Park off Leonards Road, Leonards Road, Ivybridge PL21 0RU  
Delivery of a new A1 food retail store circa. 1950m<sup>2</sup> (shell only), associated 2-tiered  
carpark, highway works, pedestrian, cyclist and public realm enhancements**

Joint Local Plan  
Paragraph 5.41 states,

*"The town has distinct characteristics, thanks in part to being well located to access Dartmoor, and also the high percentage of independent shops within the town centre."*

The independent shops within Ivybridge form part of the town's distinctive character.

Spatial Priority SP2  
Spatial priorities for development in Ivybridge

*"The plan seeks to enhance the vibrancy and sustainability of Ivybridge."*

The application does not contain any assessment of the potential impact of the development on independent retailers in the town centre. A negative impact on independent retailers will reduce employment opportunities and will work directly against the objective of SP2.1 which seeks to support the long term resilience of the town.

The development is directly contrary to SP2.2. The development will not enhance the identity of the town.

A robust assessment of the economic impact of the development on existing businesses in the town centre is required. This will enable the impact of the development on the economy of the town to be properly considered.

The development is contrary to SP2.4. The development will not improve the existing retail offer. The proposal will not protect the integrity of the town centre. The development will not enhance the character of the town centre.

The proposals would result in the loss of in excess of 20 trees from a prominent town centre site that is within ownership of the District Council.

The Arboricultural Impact Assessment (AIA) Report by Aspect Tree Consultancy sets out that:

Paragraph 6.4 *"The proposal will entail the loss of the trees within the main part of the site. The tree loss cannot be avoided due to the substantial change in ground levels and the need to provide a two-storey car park. The development is not feasible whilst retaining the trees."*

The AIA report states,

*"the most significant impact is of the loss of trees T1 to T11 (including groups)" (paragraph 6.6),*

*"The central hedge/linear feature is visually prominent... There are several oaks that are dominant and the most significant." (paragraph 6.7)*

*"There will be a negative impact due to the removal of trees required to develop the site." (paragraph 6.12). This negative impact will take place in a high occupancy area and "limited space does not allow a like for like replacement."*

The AIA report describes the proposal as *"for the regeneration of the town centre."*

This negative impact on trees, *"needs to be viewed in light of the benefits provided by the town centre regeneration"* (Paragraph 6.13).

The question to be asked is do the proposals actually amount to a regeneration scheme for the town? Does Ivybridge need regenerating given the high number of independent retailers within the town?

If the proposed scheme does not amount to regeneration of the area, the removal of these important urban trees cannot be justified by the applicant.

Due to the lack of information submitted with the application and the quality of public consultation previously undertaken, the Town Council is not satisfied that the proposed Aldi store and loss of public parking provision will bring about long term positive economic, social and environmental change and improvement to the centre of Ivybridge.

The development is contrary to SP2.6. The development does not build on the opportunities by proximity to Dartmoor National Park. Removal of mature trees and poor landscaping to proposed new buildings and decked car park does not recognise the sensitive location.

The importance of existing trees on the site has been given little consideration in the supporting documents to the application. Trees are important for health and well-being. Retention of existing mature trees in the urban area reinforces local distinctiveness; mature trees are fundamental to creating a visually attractive environment.

Trees are important for capturing pollutants. This issue should be given careful consideration due to the close proximity of the site to an Air Quality Management Area (AQMA).

The development, with proposed removal of trees, is contrary to SP2.7, which seeks to ensure that *"all development, singularly or cumulatively, will not negatively impact on the ability of the relevant authorities to improve air quality within the Western Road AQMA."*

*"Trees and other vegetation planted in the right places can help improve urban air quality on a local scale by forming a barrier between people and pollutants. They also remove some particulate pollution from the air by catching the tiny particles on their leaf surfaces."*

*Research has found significantly lower asthma rates among children aged 4-5 in areas with more street trees. As well as reducing air pollution, trees take carbon dioxide from the air, helping in the fight to limit further climate change." The Woodland Trust*

The biggest threat to clean air is traffic emissions. Given the close proximity of the site to main roads and an AQMA, combined with the fact that traffic will be using the car parks in close proximity to pedestrians, the major role that trees have to play in reducing air pollution should not be discounted by the applicant.

Air pollution has harmful effects on the health of humans, wildlife and our environment. The retention of trees on the site to mitigate the effects air pollution should be a priority of the District Council.

*"Trees will be essential in helping us adapt our cities and landscapes to the climate impacts which are now inevitable. Green spaces with trees in cities provide shade and reduce the ambient temperature through the cooling effect of evaporation of water from the soil and through leaves – crucial during frequent severe heatwaves." The Woodland Trust*

*"Planting and protecting native trees will also provide vital homes for wildlife, supporting biodiversity. They provide food and shelter for a myriad of species, from mammals and reptiles to birds and butterflies." The Woodland Trust*

*" We should live in green places and move around through green spaces. Instead of walking alongside busy roads, inhaling the fumes and detritus of urban traffic, let's make places where we can walk or cycle to school, work or leisure through parks and green corridors with trees and plants – places where we can breathe. **It is critical that we maintain existing urban trees and expand tree cover. This requires vision from those responsible for design and planning in our towns and cities.**" The Woodland Trust*

The Government has promised 50 million more trees each year until 2050 to achieve net zero carbon. Improving air quality should be identified as an important objective.

The removal of trees on Council owned land within a town centre location is counter to the aim of working towards net zero carbon.

Paragraph 5.43 JLP

*"Ivybridge town centre has built a reputation for local distinctiveness and a high proportion of independent stores. A key challenge within the next plan period is to nurture this distinctiveness, and to maintain the vitality and viability of the town centre..."*

The applicant proposes a retail use which would compete for customers that otherwise would have visited existing shops within the town centre.

The Council declared a Climate Change and Biodiversity emergency in 2019 and subsequently developed and adopted a Climate Change and Biodiversity Strategy and Action Plan in December 2020.

The goals set out in this strategy include reducing the Council's own carbon footprint to net-zero by 2030 and increasing biodiversity on its own land by 10% in 2025.

In a report to SHDC Executive on 7 April 2022, (Climate Change and Biodiversity Action – Council net-zero update) paragraph 2.4 states:

*"the Council plays an important role in community leadership and setting the right example regarding the impact of its own activities can play an important role securing behaviour change and raising awareness of the climate emergency."*

### **South Hams District Council Climate Change and Biodiversity Strategy 2020**

Objective 3 Land Use and Biodiversity

#### **Objective/target 3.6**

Develop and adopt a Natural Environment Design Guide to support Development Management proposals – **establishing importance of street trees in urban/built environment proposals**, trees in new hedge lines, and tree/woodland planting as part of onsite public open space provision

#### **Objective/target 3.9**

New development led by South Hams to be exemplar (e.g. Building with Nature, bird and bat boxes, good design with Green Infrastructure, etc).

The importance of existing urban trees has been disregarded in the proposals, contrary to Objective/target 3.6 of the Council's own Climate Change and Biodiversity Strategy 2020.

The proposals which are Council led on Council owned land fails to meet exemplar design which is required by Objective/target 3 of the Climate Change and Biodiversity Strategy 2020.