

Dear Abbotskerswell Parish Resident,

Development of land at Wolborough Barton - proposal for 1,275 homes, hotel and link road

The landowner has lodged what's called a hybrid application. The reference number is 17/01542/MAJ.

This involves a mixed-use application involving 1,275 new homes, a primary school, up to 3,500 square metres of employment floor space, two care homes, community facilities, a local centre, open space including play areas, allotments, Multi Use Games Area and other associated infrastructure. There is also a proposal for the change of use of the existing agricultural buildings opposite Wolborough Church to a hotel, restaurant and bar/drinking establishment and revised route and timing for the proposed new link road.

Abbotskerswell Parish Council and Wolborough Residents' Association(WRA) have worked meticulously through the extensive suite of TDC web portal documents – there were 2,257 pages – to produce a formal response from our Parish Council. With WRA, APC jointly concluded that we should OBJECT to the submitted hybrid application. The joint reasons for objecting are presented with this flyer for you to consider and fully understand the collective position that we are taking.

Abbotskerswell Parish Council are proposing to object to the latest proposals and we wanted to let you know what's happening and how you can help by giving your view to TDC. That the application site is historically important, is valued by its local community, and is extremely environmentally sensitive is irrefutable. Therefore, at this stage, the precautionary principle should be applied and the application refused.

APC Recommendation: Abbotskerswell Parish Council considers the application as it stands is unsustainable and therefore strongly OBJECTS to application 17/01542/MAJ.

If you wish to make representations on this application, you have until the 24th October (TDC Planning Committee Meeting) to do so.

Democratically, it is particularly important that individuals also make their views known, whether for or against. You can see Abbotskerswell Parish Council's submission on the Abbotskerswell Parish Council website at www.abbotskerswell.org.uk which explains why we feel this application, in its current form, is detrimental to the Parish, to Ambrook Ward and to Teignbridge South. The Parish website also gives links to the Planning Application on TDC's website, where you will see the latest submissions, responses and comments. These can also be accessed on the internet at:

<https://www.teignbridge.gov.uk/planning/hidden-forms/planning-application-details/?Type=Application&Refval=17/01542/MAJ>

To **read** the documents, please click on "**Documents related to this Application are available here.**"

To **comment** online, please click on "**You can comment on this application using this form.**"

If you wish, you can - **email** a submission to planning@teignbridge.gov.uk or - **send a letter** directly to TDC Planning Department, Forde House, Brunel Road, Newton Abbot, Devon TQ12 4XX

Whichever method you choose, please make sure you use the planning reference 17/01542/MAJ.

Abbotskerswell Parish Council, 21st September 2017

Ian Perry
Teignbridge District Council
Forde House
Brunel Road
Newton Abbot
Devon TQ12 4XX

21st September 2017

Dear Mr Perry

PCL Planning – Application 17/01542/MAJ17/01542/MAJ
Land at Wolborough Barton, Coach Road, Newton Abbot, Devon, TQ12 1EJ

Abbotskerswell Parish Council (APC) has worked in conjunction with Wolborough Residents' Association (WRA) to assess the merits of this hybrid application (see APPENDIX A) and APC has concluded that many issues remain unaddressed by PCL planning.

PCL's application proposes to develop **1,275 dwellings (66.72 hectares)** within NA3 Wolborough (**120 hectares**), as defined in Teignbridge District Council's Local Plan (2013-2033).

When fully developed NA3 will expand the area's population by 4000 people, potentially with 3000-4000 vehicles (domestic and commercial), across one of the most environmentally sensitive sites in Teignbridge. For comparison Abbotskerswell has population of 1,560 individuals residing in **676 dwellings**.

No attempt has been made by PCL Planning to approach APC on its NA3 plan development at any time, as confirmed in PCL's minimalistic **Statement of Community Involvement**. This is a surprisingly weak engagement statement and fails on a "meaningful and continued engagement from stakeholders" as required in TDC's Local Plan policy (**NA3 Wolborough paragraph (a)**) and is considered by APC as a serious omission on PCL's part.

In December 2012, APC and WRA previously objected to the Local Plan on grounds of Viability, Environmental Challenges, Ecological/biodiversity threats and Community and amenity and APC/WRA looked forward to TDC and PCL addressing these concerns in the promised design led masterplan.

Disappointedly in this application, many of APC/WRA's original objections raised remain unresolved in PCL's submission. The original issues with assigning NA3 are now resurfacing and are echoed within numerous stakeholders' consultation responses, namely: Historic England, South West Water, Devon County Council (DCC), Campaign for the Protection of Rural England (CPRE), Natural England, Chamber of Trade, Royal Society for the Protection of Birds (RSPB) and Devon Wildlife Trust (DWT), with further shortcomings also identified by TDC's own departments (*Design and Heritage -Trees, Design and Heritage – Landscape, Contaminated Land Recommendations, Environment and Safety Services, Royal Haskoning DHV Report, and Rigare Groundwater and Wetland Science Report*).

Some issue resolutions are likely to take up to two years to gather the required evidence before any reasoned judgement can be made on the viability and legality of this application. TDC must recognise the prematurity of this application and the weaknesses in PCL's incongruous submissions when measured against stakeholder responses.

That the application site is historically important, is valued by its community, and is extremely environmentally sensitive is irrefutable. Therefore, at this stage, the precautionary principle should be applied and the application refused.

APC Recommendation: Abbotskerswell Parish Council considers the application as it stands is unsustainable and therefore strongly OBJECTS to application 17/01542/MAJ.

Plan Teignbridge (2013-2033) Policies: APC believes the application fails to address the full scope of **Local Plan Policy NA3 Wolborough** and its respective sub paragraphs a) to n) as shown below:

- a) Failure to produce a comprehensive landscape and design led masterplan;
- b) Failure to coherently deliver sufficient employment development;
- c) Failure to assure the delivery of 20% affordable housing;
- d) Ill-defined social and community infrastructure;
- e) Ill-defined and ill-conceived vehicular route;
- f) Loss of green infrastructure, with no suitable alternative natural green space (SANGS);
- g) Severe impact to the setting of St Mary's Church;
- h) Green buffer not adequate to protect Decoy woods and requires supporting rigorous evidence;
- i) Wolborough Fen SSSI and Greater Horseshoe Bat flight routes and foraging areas severely threatened;
- j) Wildlife mitigation methods not sufficiently covered by rigorous evidence and proven techniques;
- k) Renewable energy opportunities dismissed;
- l) Inclusion of local food production areas overwhelmed by loss of farmland and landscape;
- m) Recreational space inadequate for size, density and intensity of the proposed development;
- n) Inferior Bespoke Greater Horseshoe Bat Mitigation Plan:
 - i. It has not been demonstrated beyond reasonable scientific doubt that the South Hams SAC will not be adversely affected;
 - ii. no in combination assessment with other plans or projects has been conducted by PCL or TDC.

Furthermore, detailed objections and observations regarding NA3 policies are given in APPENDIX A below.

APPENDIX A

Detailed **OBJECTIONS** to the above planning application on the following principal grounds:

1. The Application is premature;
2. The Application must not proceed until a masterplan for the NA3 allocation has been fully developed, put to public consultation and agreed; without this there is a democratic deficit denying Planners, Councillors and the public adequate engagement and scrutiny;
3. The Application must not proceed until new infrastructure is in place;
4. The Application must not proceed until water and sewerage infrastructure are in place;
5. The Application must not proceed until detailed environmental, archaeological and landscape assessments are completed;
6. The Application should be refused because submission documents lack detail, do not allow a cut and paste option for comment and contain opinions, not accepted evidence.

The Application is Premature

- This application was submitted before the Teignbridge Draft Development Framework Plan has been published.
- The PCL "masterplan" covered only three quarters of the Local Plan NA3 allocation.
- The 'Masterplan' for NA3 has not been subject to public consultation contrary to Teignbridge's own published Technical note for Development Framework Plans for master planning the Strategic Site Allocations.
- With only three quarters of the allocation covered by the "masterplan" it is impossible to effectively judge the impact of the NA3 development on the wider community.
- In the absence of an agreed Masterplan that has been subject to public scrutiny and the scale of the development (effectively a new "town" the size of Ashburton) it is unacceptable to determine so

much of the detail, particularly for those areas where there are serious questions about conclusions drawn by PCL and the effectiveness of mitigation measures proposed by the Applicant, as Reserved Matters.

Infrastructure – Link Road

- The link road between the A380 and A381 is essential and urgent and must be built before any significant housing development takes place as detailed in the Devon County response.
- The application should be refused on the basis of undue delay because it indicates that the link road completion will **only** be once the fourth and final phase of development is underway. This delay would put an unacceptable strain on existing infrastructure causing significant disturbance, additional pollution and major inconvenience for residents of Newton Abbot.
- Currently, it is acknowledged that there is no agreement that the link road can be constructed across land owned by a third party.
- The application should be refused given the inadequate detail of the carriageways and junctions. Projected traffic volumes indicate the link road design must enable unhindered passage. The proposed carriageway width of 6.1m is not sufficient unless parking is prohibited on its entire length.
- The application proposes each dwelling will have one garage and one visitor space. Given that most households have at least two vehicles this provision will inevitably lead to private and commercial vehicles being parked on the estate roads (only 4.8m wide) so the design must take account of this to avoid congestion and parking disputes.
- The application should be refused given the absence of sufficient detail on the treatment of highway run-off which must be treated utilising proven technology to ensure the continued integrity of the Site of Special Scientific Interest (SSSI), Wolborough Fen.
- The street lighting proposals lack clarity and detail. They must demonstrate that there will be no impact on greater horseshoe bats and other light sensitive species.
- An incomplete link road will mitigate against providing an economic bus service leading to more vehicles having to use the surrounding roads.
- Development of 1275 houses from the western end will put additional and unsustainable strain on Coach Road, Priory Road, Stonemans Hill and Totnes Road.
- The Local Development Framework indicated an “avenue” styled southern link road which the application does not provide for over its length.
- When complete, phases 1, 2 and 3 will generate the need for 318 primary and 191 secondary school places; under PCL proposals children will have to travel to existing schools in Newton Abbot and Ogwell. With the distances involved and the lack of suitable footpaths outside of the NA3 allocation, this is likely to generate a considerable additional volume of traffic at peak times; a situation that will exist until “phase 4” is completed.
- The primary and secondary schools should be co-located nearer Decoy to share facilities, enable progression from primary to secondary education in a single site and be located further away from Canada Hill Primary School.
- It is highly unlikely that the proposals will provide a “viable alternative to the private car”.
- Further details of the measures and their funding of the proposed traffic management measures for Coach Road and Decoy Road are required.

Access

- Phase 1 will involve a new junction onto the A381 Totnes Road south of the Ogwell Cross roundabout and adjacent to the Denbury Road spur. This will be a dangerous exit given the volume and speed of traffic at that point.
- Phase 2 access is on a right-angle bend of the Old Totnes Road near its junction with Stonemans Hill. It will also be close to a temporary access for construction vehicles to the Brunel Lodge site which was granted planning consent recently. The permanent entrance to Brunel Lodge is on the short stretch of road between the proposed new roundabout on the Old Totnes Road and the existing Ogwell Cross roundabout posing a further traffic issue for vehicles turning right towards the A381.

Traffic

- The traffic assessment for the impact on travel within the Town is limited to nine junctions when there are cumulative effects of heavy traffic volumes on how well they work when taken in conjunction with other turnings, traffic lights and pedestrian crossings. It is often the case that vehicles cannot progress through one set of lights because another set further ahead is holding up the traffic.
- Some of the data is out of date; the Penns Mount traffic data and the South Devon Link Road (SDLR) data are from 2015. New traffic surveys are required to fully assess the impact of the SDLR and the other housing developments around Newton Abbot.

Air Quality

- The measurement locations identified in the Application does not include the most serious air quality area of Wolborough Street which will be heavily adversely impacted by the additional traffic flows, particularly if development begins from the western end of the NA3 allocation without the link road going in first.
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Construction Traffic/Pinch Point Funding

- Considerable public funding was given to improve Kingskerswell Road and provide access to NA3. Development **must** start at the eastern end of the site to avoid construction traffic having to pass through the Town or attempt shortcuts using the narrow country roads (Coach Road, Priory Road, Stonemans Hill etc.).
- Figures cited in the application for traffic volumes using Coach Road are suspect as a Devon Highways survey conducted in 2009 showed higher volumes. Traffic volumes have increased considerably over the last decade.
- A weight limit is required on Coach Road except for access to properties on that road.

Water Services & Sewerage, Power Supply

- The “Rolling Fields” are underlain with sands and gravels which provide an effective filtration and attenuation facility for rainfall. The development will see a significant area become hard surfaced with roofs, drives and roads, which will impact on the rate of discharge into Wolborough Fen, a Site of Special Scientific Interest requiring proven and extensive mitigation measures if irreparable damage is to be avoided.
- The capacity of existing sewerage facilities, both transmission and treatment, are close to capacity and are unlikely to be able to cope with the additional load from 1275 houses (1575 when “phase 4” is complete) not to mention all the other developments around Newton Abbot.
- The application is silent on the capacity of the mains water system to feed this development along with the other major developments in and around Newton Abbot.
- The removal of part of Decoy Brake will further reduce the attenuation and purification provided by woodland.
- More detailed assessment is required on the impact of extensive earthworks associated with constructing the link road and erecting the buildings and how this will affect the water table and flows through aquifers, particularly as Wolborough Fen is fed from much of the development area.
- The statement that only 8% of the catchment (for Wolborough Fen) will be impermeable seems to be a low estimate that requires confirmation.
- What are the continuing cost implications of maintaining the SUDS systems on householders?
- How will the efficacy of any SUDS system be monitored over the long term (10+ years)?

Setting & Amenity

- The setting of the historic listed St. Mary’s Church and the wider vista of Wolborough Conservation Area provide the last open space between the Town and Torbay which will be lost contrary to the recommendations in the Council’s recent Conservation Appraisal for Wolborough.

- The substantial increase in population, likely to be some 3500 residents, will put an enormous strain on the already very widely used Green Flag Decoy Country Park possibly jeopardising its current status and amenity.
- Far from the claim that NA3 will connect the countryside with the Town, it will significantly damage the open space and through dust, noise and light pollution, have a much wider impact on the surrounding houses.
- Currently NA3 is in walking distance of households of Decoy, Aller, Buckland, Newton Abbot Town, Ogwell, Abbotskerswell and Wolborough providing great amenity value at negligible cost. Walking through a new town of 3500 residents will NOT be attractive, consequentially a significant physical and mental health benefit will be lost forever and thus detrimental to overall wellbeing to the Heart of Teignbridge.
- Once houses are complete, at a density of 30 – 40 per hectare for all but a small parcel and ranging between 2 and 2.5 storeys, the visual impact on the Rolling Fields will be considerable with most of the green aspect severed from view, particularly from lower ground such as Decoy.

Environment & Biodiversity

- Part of the western development area is already used as a mitigation site under a Stewardship agreement for Cirl Buntings in lieu of territory lost following construction of the SDLR. This area should continue to be allocated as such.
- The development area impacts negatively on a strategic flyway for the South Hams SAC. The mitigation offered is mainly opinion and largely unsupported by current research.
- PCL attempts to undermine Natural England's longstanding and accepted planning guidance for the South Hams SAC. PCL are planners NOT environmental scientists.
- No detail is provided for long term monitoring of proposed mitigation measures.
- The relevance of the SHSAC is dismissed when in fact the allocation area provides valuable inter-connecting greater horseshoe bat flyways between SAC roosts, designated and otherwise.
- The removal of 1894 m of mature Devon hedgerows and 4 veteran oaks will further impact on bat flyways as well as destroying habitat for many other animals.
- The application identifies replacement hedgerow, which must be like for like Devon banks, but omits what effect this will have on wildlife during the long period of re-establishment.
- The link road in particular and the layout of the three housing sites will cut across free movement of animals, fragment habitat and alter their feeding and breeding patterns.
- The mitigation measures proposed for Wolborough Fen are not unanimously agreed upon. Four reports differ in their conclusions. The geology of the area and the efficacy of SUDS systems has not been sufficiently investigated to support PCL's mitigation conclusions.

Arboricultural Impact Assessment

- The proposed route of the link road will see the destruction of 2.2 hectares of woodland and give potential for further damage to surrounding trees from emissions.
- Removal of such an area of woodland will create increased risk of flooding around Decoy.

Employment

- The principal additional employment land is located on the eastern side of the allocation and has not yet secured the agreement of the landowners.
- Exeter is the main draw for employment and with the development of a large industrial area at Kennford this will only increase the out-commuting risking turning Newton Abbot into a dormitory town rather than a sustainable, self-supporting community.
- There has been little growth in employment opportunities in Newton Abbot in recent years which suggests the claim that 129 (152 without 10% leakage) full time jobs is optimistic.
- Development of the western side first will require travel to work to be through the already heavily congested Town centre.

Local Education & Health Provision

- Given the resulting increase in population there must be certainty about the provision of schools. The proposed site for a Primary School and the land notionally earmarked for a Secondary School would be better co-located to make use of shared facilities.
- When schools are built adequate provision must be made for children to be dropped off and collected in safety and without causing parking problems and traffic congestion suffered by so many educational establishments.
- The proposed site for the Primary School is close to Canada Hill and would be more sustainably located towards the centre of the development.
- The UK average number of GPs per 1000 of population is .58 requiring two full time Doctors for NA3.

Footpaths/Pedestrian Access/Cycle Routes

- The “masterplan” indicates pedestrians accessing the site will use either a junction onto the A381 south of Ogwell Cross, the new road onto the Old Totnes Road or via Magazine Lane into Coach Road. There is an additional proposal to create a footpath into Stonemans Hill. The A381 has only intermittent footpaths making it impossible to walk in safety into Town via this route; to the south towards Abbotskerswell/Ipplepen there are no footpaths. Coach Road has no footpath and is a narrow lane carrying a high volume of traffic. Stonemans Hill is also a lane with no provision for pedestrians. On-site footways and cycle paths may be adequate but the surrounding infrastructure is not.
- Routes over Wolborough Hill are steep and challenging for anyone with mobility issues or pushing prams etc.
- Cycleways and footpaths should not be shared space particularly given the topography of the site when cyclists could be travelling at speed downhill.
- There is insufficient detail on how existing public footpaths will be maintained and enhanced.

Full Application for Hotel/Pub at Wolborough Barton

- There must be a question of need given that the Queens Hotel is being converted into residential use because of non-viability.
- The indicative redevelopment plans for the Cattle Market area of Newton Abbot includes a proposal to build an hotel which further brings into question the potential viability of a small hotel on the edge of Town with difficult access.
- The access to the site is on a very narrow stretch of Coach Road, blind to the south west.
- The increase in traffic generated by such a facility would put unacceptable additional pressure on Coach Road.
- The application is silent on the longer-term use of the farmhouse.
- There appear to be two potential locations of a new farm, on the ridgeline on both sides of Stonemans Hill; this should be clarified and be subject to a further planning application.
- For centuries St Mary’s has been sited in a quiet rural setting. Many locals cherish this aspect and visit to absorb its serenity. The proposed development will have a detrimental effect.

Housing Supply

- With the ongoing developments at Penns Mount, Whitehills and Houghton Barton, Buckland plus smaller sites at Brunel Lodge and the former Bishop Dunstan School along with windfalls, there is approaching nine years housing supply which begs the question whether a further 1275 homes is appropriate at this time.
- *Plan Teignbridge* is a 20-year plan with 16 years to run, so with 8.58 years Land Supply, Government targets have been exceeded. The pace of Heart of Teignbridge new allocations should be conservative, cautious and further developments deferred until the 5-year review of the Local Plan is published for public consultation, debated and adopted by Members.
- Further, the Greater Exeter Strategic Plan is due to be published within a similar timeframe. This will provide a much-needed and long overdue strategic overview taking proper account of all factors

impinging on the wider community, not just the District. Excessive overprovisioning of land will only increase an excessive land bank.

- Over-provisioning of dwellings may result in falling house prices, which superficially is an attractive proposition, but conversely this may force many first-time buyers on low incomes and others into negative equity and potential financial loss.

Viability

- With the essential infrastructure for roads, sewerage etc. and the additional requirements for archaeological, environmental and mitigation assessments along with the topography of the site, is the development viable if it is to be designed and built to mandated high standards?
- With the current developments around Newton Abbot approved and underway, the development of NA3 at this time is likely to adversely affect the local housing market without bringing the benefit of increasing the stock of affordable homes.
- PCL dismiss green and efficient energy sources leading to the properties having high running costs. This conclusion must be re-evaluated in the light of future carbon reduction targets.
- What measures can be taken to avoid original and approved designs being diluted as has happened at Sherford? If the development cannot proceed at the high standard envisaged in the Local Plan, should it proceed at this time?
- A similar question of viability hangs over the capacity of the power supply to cope with all the developments in and around Newton Abbot, likely to result in over 30% increase in population.

Land Allocation

- There are conflicting entries in the documents for the future use of land south of Coach Road between the allotments and Wolborough Barton Farm.

Process

- The bundle containing supporting documents amounts to 2257 pages of repetitive information with little clarity enabling individuals to distinguish between documents relating to the outline and full application.
- Much of the documentation is not in correct PDF textual format. They are rendered as images which is highly unusual PDF format and this disadvantages all consultees who wish to make specific textual references within their response.
- Much of the content is repetitive so the excessive amount of documentation supporting the application confuses rather than enlightens and in places the information is contradictory.
- The documents were not indexed, numbered or in some cases paginated with crucial documents printed in extremely small font, resulting in readability problems for many people.
- The application should not be considered until **all** land use within the NA3 allocation is legally agreed with the landowners to avoid an incomplete development compromising the inclusion of necessary schools, medical services and crucially, the early completion of the link road.
- The PCL application documents, minimising impacts and dismissing guidance and concerns of bodies such as Natural England and Historic England, are based on PCL's opinion rather than facts. Their conclusions and recommended mitigations must be subject to public scrutiny and examined for viability and veracity before Officers and Councillors can be expected to determine the application.
- Separate applications are required for the two elements of this hybrid application and site-specific information relating to each of them **must** be presented to enable consultees, the public and other stakeholders to better appraise their individual merits.
- All matters reserved bar access for the outline application will place an unreasonable burden on the Local Authority's resources and make proper scrutiny by the Planning Committee much harder.