

Draft Teignbridge Local Plan (Part2)

Site Options Consultation – Bovey Tracey Town Council Response

During the development of the first iteration of the Teignbridge Local Plan 2013 to 2033 the community of Bovey Tracey were presented with a set of proposals for our town that achieved the wider objectives of the Plan – a balanced approach to change in and around our community.

As a Town Council we recognise and value the area where we live and we are committed to protecting and managing this really important asset for future generations. We recognise within the context of our Parish (Bovey Tracey and Heathfield) that a small number of new homes will need to be built over the course of the next decade, paying particular attention to affordable houses for local families and accommodation for older people. BUT these developments need to be sensitive to diverse ecology and the high levels of biodiversity we have in our parish, some of which lies within Dartmoor National Park.

As a Town Council we welcome the commitment to limit development to the most sustainable locations, improving the balance of housing, employment and facilities but these are finite opportunities within our community. We therefore feel that the options to achieve this balance within our parish, given the historic level of development within our town, are very limited.

During the development of our Neighbourhood Plan (due to be adopted in November/December 2021) we have consulted widely with our community. What is clear from these conversations is an appreciation within our population of the qualities of our town. What has been made equally clear to us is the view that these qualities are fragile and if we are not careful we could destroy that thing that we are seeking to protect.

The area of local development that is universally supported by the residents of our parish is the reprovision of the Primary school within the Town. The Local Plan 2013-33 identifies a site for the new facility off Le Molay-Littry Way (BT4). Given the increase in population that will result from historic planning consents it is clear that the current premises are and will be inadequate to meet the projected demand. The Town Council strongly supports reprovision of the school on the identified site as this in turn will produce a vacant flat site close to the centre of our community that would, in our view, be perfect for the provision of housing for the older members of our community due to its close proximity to town centre facilities. Current Local Plan Policy BT2D supports this. These are NDP identified needs and would provide a once in a generation opportunity to demonstrate that we value our younger and older people for the diversity that they bring to our community.

Proposed Sites Consultation

Perfect sites for development in the parish of Bovey Tracey are now long gone. The Local Plan 2013-2033 provided an allocation of approximately 635 homes (excluding 83 at Cardew Pottery approved ahead of plan) and development was scheduled over the 20-year life of the plan. In 2021, just 7 years after the Local Plan 2013 was adopted (May 2014), Bovey had already overachieved on most of its allocation. The Local Plan referenced 5% of Teignbridge's allocation would fall to the Parish of Bovey Tracey; current figures show that in the initial 7-year period of the plan that has lapsed the Parish has gone beyond that allocation with 5.12% having been accommodated, and that excludes the smaller infill

developments not referenced within the plan. The Parish is thus over its current allocation, which should be taken into consideration in the next phase of the Local Plan being put forward. The Town Council would like to make the following site-specific points:

Golf Course (producing 200 - 300 homes)

The Town Council would like to raise the following concerns in relation to this site:

- 1) Even if many of the houses can be located discretely, there will be a loss of habitat, with light and noise pollution being introduced into a previously very quiet area (particularly at night). Being so close to the National Park, the increase in pollution will adversely impact on the Dartmoor National Park and will take away yet another corridor through which animals can travel between our key green spaces. Any development in this location would require the most stringent of investigations and mitigation in relation to its impact on biodiversity, not just on the location itself, but regarding the surrounding area and movement of species in and out of the National Park.
- 2) The site is on the opposite side of a busy fast road where even the national speed limit is regularly ignored. This road will be a physical and social barrier with future residents not fully living in Bovey Tracey.
- 3) There does not appear to be any possibility of creating a safe and welcoming cycle or pedestrian route to the town centre. Moretonhampstead Road is not suitable, being a narrow, windy and actually fairly busy road, without a path on either side, and which drivers use as a cut through to reach the east side of the Parish and beyond to Exeter and Torbay. Monks Way is a fast, busy road, again without a path on either side.
- 4) The site is not served by any meaningful public transport and the only means of transport to and from the site will be by private motor vehicle, which makes the proposal unsustainable.
- 5) The site is currently providing a large sink for rainwater, slowing its flow into the River Bovey below. Even with significant SUDs put in place, given the disruption from an increase in built environment further down in the catchment area, we are concerned that this development upstream may lead to a greater probability of flooding in an area which has seen significant flooding already over the past few years and which, through climate change, is likely to see even greater flooding in future.
- 6) The site is located off the A382 Monks Way, close to the junction with Moretonhampstead Road. There is no dedicated pedestrian access into the site and the vehicular access is via a ghost island right turning lane junction 45m south of the junction with Moretonhampstead Road. This A382 in the vicinity is subject to the national speed limit for single carriageways (60mph) and there is no street lighting either on the A382 Monks Way or Moretonhampstead Road.
- 7) The nearest existing highway links connecting this site to the town are either via Moretonhampstead Road or via Monks Way and Station Road. There is a minimal footway provision (12% of road length) along Moretonhampstead Road between the junction with Monks Way and Hind Street which could form a link to the town centre and there is no footway

on Hind Street which is steep and not suitable for push chairs/wheelchairs. There is no pedestrian provision on Monks Way.

- 8) A transport assessment prepared for the Dean Park phase 1 housing development off Moretonhampstead Road (63 dwellings) concluded that based on an automatic traffic counter survey all of the traffic generated by development would travel via Moretonhampstead Road and Monks Way. This conclusion is flawed because no measurement was taken of eastbound traffic generated along Mary Street with destinations towards Exeter/Chudleigh and possibly the town centre. Exeter bound traffic travelling via Drum Bridges and the A38 would have a journey of 9.5km to the 'Chudleigh' slip road compared to a distance of 6.4km travelling via the B3344 and Chudleigh Knighton to the same point on the A38. Census based traffic distribution analysis used in the transport assessments undertaken for the Bradley Bends and Challabrook developments indicated that 50% of trips generated would have a destination towards the east (A38 Exeter bound). Eastbound movements from the both the Dean Park and the Golf Centre sites would be either Moretonhampstead Road/Mary Street/East Street or via Monks Way/Station Road/Le Molay Littry Way. Typically housing developments generate in the order of 5 two way vehicle movements in a 12 hr day. For 300 houses on the Golf club site this would amount to an additional 1500 journeys per day, of which 750 would be eastbound using either Mary Street/ East Street/Bradley Road or Station Road and Le Molay Littry Way or Fore Street. This would be in addition to the 300 eastbound movements generated by the Dean Park development giving a total of 1050 two-way eastbound movements (or 88 two-way movements per hour). The existing local road network does not have adequate capacity to safely accommodate this additional vehicle movement.
- 9) Vehicular movement along Mary Street is severely constrained by residents' roadside parking and East Street is narrow and not wide enough for two cars or a car and a bus to pass in some locations. The current situation does not afford access for Emergency Vehicles and any additional traffic generation will only exasperate this.
- 10) Vehicular movement along Station Road is constrained by parked cars at the west end and by a narrow alignment, junctions with poor visibility and significant interaction with pedestrians around the main car park, the Guild and the car park to the COOP food store. On this section of road during the last 5 years there have been 4 slight and 2 serious accidents 3 of which involved a pedestrian or a cyclist.
- 11) Fore Street is often congested and regularly grid locked with traffic due to the presence of parked vehicles and its narrow alignment. There is a high volume of pedestrian movement involving crossing the road. During the past five years there have been 4 injury accidents of which 1 was serious and one was a fatality. Each of these accidents involved a collision between a vehicle and a pedestrian. This section of road currently does not have any residual capacity to safely accommodate additional traffic. In conclusion, the existing local road network does not have adequate capacity to safely accommodate the additional vehicle movement generated from the allocated and proposed additional housing.

- 12) The bus service nearest to the development to key destinations such as Newton Abbot or Exeter is reached via a bus stop on Union Square in Bovey Tracey a distance of 1.3km from the centre of the site. Where a bus stop is in excess of 400m from a residential development, it is unlikely to provide viable alternative sustainable means of travel.

Essential Mitigation

i) Establish a pedestrian and cycle link to the town centre either via new footway/cycleway adjacent to Monks Way linking to Mill Marsh Park, or alternatively the provision of new lengths of footway along Moretonhampstead Road to link in with the existing provision. These footway links would need to be lit but due to the proximity of the site to greater horseshoe bat flight zones, the lighting would need to be bat friendly. A safe pedestrian crossing of the A382 would need to be established and this would need to be accompanied by a local 30 mph speed limit on both Monks Way and Moretonhampstead Road.

Reason

In order to enable safe, sustainable non-vehicular movements to key local facilities and access to public transport.

ii) Provide town centre traffic management and movement safety measures.

Reason

To enhance the capacity of the existing streets to accommodate the additional traffic generated.

To enhance the safety of pedestrians crossing into the COOP where there is already an unacceptable hazard for road users.

To enhance safety for pedestrians and cyclists on Fore Street where there is already an unacceptable accident record and to increase on-street parking to accommodate additional vehicles generated by the development particularly those used by people with impaired mobility.

For these reasons we do not believe this site should be put forward into the next phase of the Local Plan.

Bradley Bends (producing 121 homes)

Without the demand for more housing which has been imposed on Teignbridge District Council, the Town Council would see this further extension of development towards Chudleigh Knighton as being unacceptable. However it is considered to be acceptable for the following reasons:-

- 1) It relates functionally to the town centre with established walking and cycle routes.
- 2) It is well away from the sensitive landscape of the Dartmoor National Park and will only have a limited adverse impact on the local landscape.

- 3) This site is located to the east of the recently completed Bradley Bends housing development and both vehicular and pedestrian access would be via the estate road network constructed by Devonshire Homes.
- 4) There is an established pedestrian and cycle link to the town centre on the north side of the B3344 Le Molay Littry Way. The distance to the town centre is approximately 1.5km.
- 6) Based on the transport assessment for the Bradley Bends development as prepared by Sands consultants, this development would generate in the order of 600 two way vehicular movements in a 12 hr day. Of these trips 115 (or 10 additional trips per hour) would have a destination to the road network around the town centre (via Fore Street or Bradley Road) and 185 two way movements would travel along Station Road. Approximately 300 two-way movements would be generated towards the east along the B3344.
- 7) The No 39 service which links Newton Abbot to Exeter currently runs along the B3344 and most services use Bradley Road to access the town centre. The nearest bus stop is 510m from the centre of the site.

Essential Mitigation

- i) Provide town centre traffic management and movement safety measures.

Reason

To enhance the capacity of the existing streets to accommodate the additional traffic generated.

To enhance the safety of pedestrians crossing into the COOP where there is already an unacceptable hazard for road users.

To enhance safety for pedestrians and cyclists on Fore Street where there is already an unacceptable accident record and to increase on-street parking to accommodate additional vehicles generated by the development particularly those used by people with impaired mobility.

- ii) To negotiate with Devon County Council and the bus companies to locate a new bus stop closer to the development.

Reason

To encourage residents to use public transport as a means of travel to the town centre and for journeys to Exeter or Newton Abbot.

Pottery Road (producing 20 homes)

The loss of this site for employment use is something that has to be assessed in the context of the strategic distribution of employment land in the district. It does however appear not to be used intensively and its loss in a strategic context may be offset by the fact that it is wholly suitable for residential use. It is an isolated pocket of employment

land in an otherwise quiet residential area. It has good access to the town centre and to public transport and would be an ideal location for a development which could be focused on making provision for elderly people.

This site along with the Hospital site is expected to jointly accommodate 25 dwellings and would have only a minor impact on the movement network.

Old Hospital Site (producing 5 homes)

This site is acceptable, but the policy should make it clear that it should be developed with small units which should replicate the form and proportions of the existing hospital. The small units could either be social housing or if say, single bedroom, could be open market units.

This site along with the Pottery Road site is expected to jointly accommodate 25 dwellings and would have only a minor impact on the movement network.

Cannon Rd Heathfield (producing 32 homes)

An inspection of the site just using an Ordnance Survey Plan indicates that as it is surrounded by housing on three sides, it would appear to be suitable for a residential allocation. However, the area is relatively intensively used by a number of employment uses and it must be questioned whether the loss of so much industrial land accords with policies which seek to retain employment uses. It does however appear that no assessment has been made in relation to the proximity of what will be retained uses which abut the area. The food processing factory on Cannon Road has noisy ventilators which would make residential use wholly unacceptable for at least a part of the proposed allocation. It is strongly suggested that even if in strategic terms the loss of this employment land is deemed to be acceptable, an assessment needs to be made in relation to the suitability of building dwellings next to an established noisy industrial use.

Bonds Meadow (currently part of BT1 allocation)

Further to the new potential sites listed above, a Saved Allocation (Bonds Meadow- part of the BT1 allocation) should be removed. This site is now the subject of intense debate with the campaign to "Save Bonds Meadow" citing that the National Trust who own the land are acting against their founding principles and against concerns relating to climate change. The thrust of the Town Council's view is that this land should be assessed in the light of current policies. The following points should be taken into account:

- 1) There are now local, national and international policies which seek to create and maintain woodlands which supersede the original decision to allocate the land for development.
- 2) There is no viable long-term mechanism for safeguarding the protected trees once development has taken place. In addition to the protected trees, the whole area is now a wildlife rich woodland.

- 3) To mitigate the carbon impacts of removing these mature trees, four to five times as many new saplings will need to be planted at the same time to sequester as much carbon as this woodland currently does – will all of these trees even be planted and if so, where? The Town Council has been pro-actively planting trees on its own land, as well as encouraging residents to do the same, yet the building of homes on the Bonds Meadow site would, in one fell swoop, destroy all the positive efforts we have been making as a Parish to contribute positively to the climate emergency.
- 4) The Bovey Tracey Neighbourhood Plan has included the site in Policy LE10 as a “Local Green Space (which) will be protected from development due to (its) local significance”. In their statement Teignbridge District Council have confirmed that; “Development within Bovey will need to comply with the policies of the emerging Bovey Parish Neighbourhood Plan.”
- 5) The National Trust has conceded in its letter announcing the sale that the site is only acceptable for low density housing. This suggests it will not make any useful contribution to the housing crisis or a meaningful contribution to the overall need for housing in Teignbridge.
- 6) Unless the developer comes to a deal with Burrington Estates to access the site from Moretonhampstead Road, the only other access points are via Priory and Bonds Meadow which are totally unsuitable to cater for construction traffic.

General themes/issues

In addition to the site-specific comments above, The Town Council wishes to take this opportunity to comment on more general overall concerns and issues facing the Parish if the plan proceeds as proposed:

Infrastructure

The net outcome in relation to additional housing will put more pressure on the existing infrastructure, both in Bovey Tracey and in Heathfield.

Education

Bovey Tracey Primary School has a capacity for 280 students and currently accommodates 270. The Longstone Cross development is planned to deliver 168 new dwellings of which approximately 25% are complete leaving 126 yet to come on stream. Under the current adopted Local Plan, the Dean Park development has an allocation of 120 dwellings and the North of Indio House development has an allocation of 45 homes. The Local plan review proposes a further 426 new dwellings within the sustainable travel catchment of Bovey Tracey Primary School. The total number of homes already allocated together with those proposed in

the review total 717. A primary school place will need to be provided for every 4 new houses. Thus for 717 new houses approximately **179** additional primary school places will need to be provided. This takes no account of the rising birth rate among the existing population of the town. Thus, the current primary school could not accommodate that number of children.

It has been suggested that there are spare places at St Catherines School in Heathfield. The capacity of that school is 210 and the current student roll (July 2021) is 136 so potentially could accommodate a further 74 students. The local plan review proposes an allocation of a further 20 dwellings on the Cannon Road site and for that a further 5 places would be required at the primary school. The net spare capacity at St Catherines would therefore be 69. This would plainly be inadequate to serve the planned new housing in Bovey Tracey.

Chudleigh Knighton Primary School has a capacity of 105 students. The current roll is 110 so this school has no available capacity.

There are no footway links between Bovey Tracey and either of these schools so the only viable means of delivering students to them would be via the private car which would not meet sustainable travel objectives. Each of these schools already experience unacceptable congestion and the resultant safety hazard caused by additional children being transported to school by the private car would be unacceptable.

If the housing proposed in the local plan review were to proceed to fruition there would therefore be a shortfall of at least 100 primary school places. Prior to the commencement of any planned housing development it is **essential** that a new primary school with a 500 student capacity is built in Bovey Tracey. Any new school must also include provision for Early Years. A site off Le Molay Littry Way has already been allocated in the current Teignbridge Local Plan for this purpose.

Health & Wellbeing

One additional area of major concern for a parish with a higher than national average age distribution – it is a nice place to live and many retired people choose to relocate here – is that as our population figures rise as a result of a significant number of new homes increased demand pressure is put upon our existing community infrastructure particularly primary care GP services. Whilst we recognise that TDC is not responsible for many of these community based services, we do see an absolute need for demand and supply issues to be co-ordinated in a whole system integrated approach to future planning.

Employment

More stringent controls need to be put in place to ensure that allocated ‘Employment Land’ is appropriately pursued and marketed to mitigate the risk of allocated land, which then subsequently is pursued as additional housing.