



BUCKFASTLEIGH TOWN COUNCIL

Judith M. Hart
Clerk to the Council

Website: www.buckfastleigh.gov.uk

**TOWN HALL
BOSSELL ROAD
BUCKFASTLEIGH
DEVON TQ11 0DD**

Tel / Fax (01364) 642576

Email clerk@buckfastleigh.gov.uk

Mr C. Hart
Planning Officer
Dartmoor National Park Authority
Parke
Bovey Tracey
Devon, TQ13 9JQ

14 September 2018

Dear Mr Hart,

Re: Planning Application 0452/18 - Proposed: Residential development for up to 30 dwellings together with associated highways and drainage infrastructure, open space and landscaping at land at Holne Road, Buckfastleigh

The Town Council would like to voice our objection to the current planning application on the following grounds:

Affordability

As evidenced by the applicant's consultation and the draft Neighbourhood Plan, there is a predominant need locally for truly affordable low cost and/or social housing, not for market value dwellings. In this application the Dartmoor National Park Authority (DNPA) 50% target of so-called 'affordable' homes is being completely ignored.

We question how much the token contribution of £200,000 proposed will build in the way of 'affordable' housing and where and how will this be spent?

The Section 106 draft quotes a viability assessment that supposedly demonstrates that the developers cannot afford any 'affordable' homes as part of the proposal. It has proved impossible to locate this document, so we are unable to comment. We suspect that this is merely the start of a bargaining game and in our opinion if there is a target for affordability then DNPA should reject this application unless this target is met.

Economic Benefit

The application proposes that the local community will benefit economically through inward investment by an additional 30 homes (Planning & Socio-economic Statement 7.4-7.6).

Buckfastleigh has very little local employment and what there is mostly low-income work in the care and hospitality sectors. It has very little in the way of local amenities and shops. The town acts increasingly as a dormitory settlement for Plymouth, Exeter and the surrounding centres and we see very little net contribution accruing to the local economy - spending and earning are done elsewhere. It is therefore extremely unlikely that a household could spend £12,180 per annum in the town as quoted.

It is also suggested that new home owners will spend £5,000-£10,000 to furnish their homes. We propose that this would provide little benefit to the local community, apart from the local electrical store they would probably have to be buying their furniture second-hand from Refurnish, the local recycling charity. It would be almost impossible to spend that much!

Services

Any new development must be considered in the light of an ongoing background of cuts to public services. Local education, the youth service and early years provision, transport, health, social care and medical resources have all been cut severely in recent years. The Town Council is struggling to try and fund services for young people and the elderly to fill some of these gaps.

As an example, the Travel Plan included in this application is already inaccurate. Buckfastleigh is no longer served by the 88 bus on Sundays and Bank Holidays as the funding from Devon County Council (DCC) has 'expired'. This service has also been cut back during weekdays. This is part of a continuing background of ongoing cuts to public transport connecting Buckfastleigh and Buckfast to the surrounding areas and clearly demonstrates the continuing trend.

With regard to offsetting some of the additional strains placed on the community by this proposal, no contribution towards increased educational costs (approx 12 students) is being sought by DCC. The County Council will request 5 years funding towards transport costs for children attending South Devon Community College and £250 per dwelling towards early years education (Section 106 Draft Heads of Term). We do not see how this is adequate or sustainable. Section 106 payments are one-off and once spent do not help with the long-term provision of services. Once they are exhausted there is no more money to pay for these extra burdens on infrastructure.

Local primary and secondary schools are under tremendous pressure due to a swathe of cuts in recent years with support staff and teachers lost. Rather than 'sustaining' them (Planning & Socio-economic Statement 7.8), the extra pupil load (without any additional funding), will merely cause additional strain. Though DCC states that there is surplus capacity and therefore no investment is required, we have received a very different message from local schools.

From the estimated £38,580pa of additional council tax generated (7.11 Planning & Socio-Economic Statement), very little would in fact end up in the local community. As District and County Council cut local services and focus spending on 'centres of excellence' in bigger towns, no more funding is received by the Town Council from the District Council from next year, so the majority of this will leak out. Buckfastleigh Town Council would receive approximately £3,500 which would be spent directly in the community but is such an insignificant amount it would be of little benefit.

We fear that any financial benefit from this development would be lost to the local community whilst at the same time there would be an increased drain on local resources that are already stretched to breaking point. In our opinion, any new housing development should go hand-in-hand with increased and sustainable resources to local services.

Consultation

As seems to be normal in planning consultation exercises, activities are reported as evidence of adequate consultation (Planning & Socio-economic Statement 3.3–3.5 and 'Statement of community involvement'), but there is little information about the responses received or recognition that they were overwhelmingly negative. It is clear from the results of the consultation and feedback we receive that local people do not want a development on this site which will result in additional pressure on local education provision, transport, health and medical resources, sewage treatment capacity etc. and will have no benefit to the community with the majority of the properties being beyond reach for the few local people in proven housing need.

Complaints were also received by the Town Council about the structure of the online questionnaire which was trivial and was constructed in such a way that there was no room for objections to the proposal.

This site has been the subject of a request for removal from the local plan allocations by the Town Council as a result of consultations during the recent Neighbourhood Plan.

At time of writing, 18 comments had been received on the DNPA planning portal, all of which are effectively objecting to the proposal in its current form.

It merely serves to further disenfranchise the population from becoming involved in any so-called consultation, if their responses are ignored and it is simply seen as a 'done-deal'.

Flood risk

Buckfastleigh is at increasing risk of more frequent flooding from the river Mardle with several major incidents over the last few years. We are concerned that although attenuation storage is recommended in the Flood Risk Assessment and the Section 106 draft proposes a management company to maintain this, we have no guarantee that attenuation will necessarily be adequate (especially in the light of increasing rainfall due to climate change) or that it will be effectively maintained in years to come, thus increasing surface water runoff into the nearby Mardle tributary and subsequent increased and more frequent risk of flooding below in the town centre.

Increasing periods of high rainfall and development of greenfield sites also increase the frequency of overspill of untreated sewage into the highly environmentally sensitive River Dart from the sewage treatment works below the town.

Sustainable Development and the Environment

The need for 'Sustainable Development' is at the heart of the 'National Planning Policy Framework' is reiterated several times in this application (Planning & Socio-economic Statement 6.41). We however see no indication or evidence whatsoever that this development would be in any way 'sustainable'. The Sustainable Development Commission States that Sustainable Development is about "...Living within our environmental limits...", 'reducing climate change' and "about ensuring a strong, healthy and just society...." "...meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity".

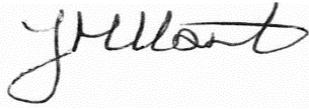
We cannot see how this proposal in any way meets those criteria. Is it a sustainable development? Does it incorporate low-energy and low environmental-impact technologies? Is it carbon-neutral or made from environmentally-friendly materials? Does it meet Passive House standards or incorporate community or self-build housing initiatives? Does it enhance the natural environment and support biodiversity? does it lower environmental risk? Does it result in a more cohesive, inclusive or equal community (which providing truly low-cost and social housing would do)?

What are the 'exceptional circumstances' and the 'public interest' that are served by this greenfield development in a National Park? (Planning & Socio-economic Statement 6.12). The site is not as claimed part of the town, it is a greenfield site outside the current extent of built environment. It is a field and is clearly an intrusion into open countryside (6.19).

With, for example, the loss of 75% of flying insects over the last 30 years and 130 bird species fallen by 90% since 1970, it is increasingly clear that we have a duty to safeguard the natural environment for future generations. The National Parks are the last havens of wildlife in this over-crowded country where man has increasingly wiped out any living organisms. Any encroachment on the

environment in the diminishing green space but particularly in a National Park should need some serious justification, it cannot be represented as 'sustainable' in this regard.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Hart', written over a light grey grid background.

Judith M. Hart
Buckfastleigh Town Clerk

C.c Buckfastleigh Town Councillors