



# BUCKFASTLEIGH TOWN COUNCIL

**Judith M. Hart**  
*Clerk to the Council*

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

28 August 2019

Dear Mr Hart,

**Re: Planning Application 0300/19 – Proposed: mixed use development through the conversion of existing buildings and new build of a care village with a communal facilities hub, extended retail provision, open space, landscaping and car parking at Lower Mills, Buckfast Road, Buckfast**

This proposal is a relatively environmentally sensitive one for development on a brownfield site that has the potential to bring some economic benefit to the parish. Buckfastleigh Town Council is broadly supportive of the proposed development subject to further clarification and assurances.

## **Employment**

The closure of the Axminster site which was the last major employer left in the town, led to a major economic downturn and increase in poverty amongst local people. We desperately need local employment to help the community back towards being a thriving one again and this development could support this.

We note that the proposal will bring a welcome 120 full-time equivalent care-related jobs and a number of ancillary support roles. We are also told that some training for nursing staff will be incorporated on-site.

This proposal could be a major provider of employment that would benefit the people of the parish but only if efforts are made, both now and in the long-term, to recruit staff from the immediate local community. We would therefore welcome the following:

- Any initiative to encourage, support and train local people who live within Buckfastleigh or the adjoining parishes to take up these positions. This would not only benefit our community economically but also reduce the impact of transport emissions and road traffic congestion.
- Work with the Town Council to develop a corporate social responsibility programme which invests in the local community for eg. promote an apprenticeship scheme for 16 to 24-year olds.

## **Facilities**

We are pleased to see that a suitable replacement for the village hall has been agreed and that resources such as office space, gym and craft workshops will be made to the wider community, but would seek the following assurances:

- A new village/community hall is an important facility for the residents of Buckfast and the wider community. We hope that guarantees are in place that this resource will be made available long into the future.
- We would like to receive details of how the facilities and activities will be made accessible and affordable to local residents in the long term.

## **Economics**

We recognise that an addition of 300+ new residents in Buckfast may provide economic benefit to local retailers and service providers. The proposed development includes retail and service outlets which due to the nature of the residents and their possibly limited mobility, especially given that the town struggles with limited parking and accessibility, it is entirely possible that the benefit to the existing town traders (who are already struggling at the edge of viability) will be more than offset by the loss of existing custom due to the opening of an out-of-town facility with liberal parking and easy access to the A38.

This is a major concern of local high street traders and has been the subject of emergency meetings with the Town Council in recent months. It is also contrary to the Dartmoor National Park Authority's policy regarding off-High Street development according to the Local Plan. We believe this is a serious issue that needs to be considered very carefully as the loss of one or two more outlets in the High Street could lead to an accelerated cycle of business failure leaving Buckfastleigh as a ghost-town.

- As specified in the DNPA Local Plan there is a requirement to carry out an Impact Assessment. We would expect this to include the effects of the proposed out-of-town retail and service outlets together with parking and traffic movement within the town.

## **Transport/Traffic**

The Town Council welcomes suggestions that a minibus service might be introduced to join the proposed development to the Town Centre.

- We would like to work together with the Abbey to ensure that this is a resource that benefits the wider population of the town.

We are aware however, that at the very least staff movement alone will generate more than 500+ car journeys each day and there will be additional van and lorry movements on and off the site. These will very likely peak at staff changeover times and will be mainly straight onto the A38 via the Dart Bridge Road junction. The Highways England estimate is at 615 trips per day which it points out is 335 less than was permitted for prior industrial use, so it has no grounds for objection. Our concern here is that traffic has been on the increase in the interim period which has been exacerbated by the withdrawal of funding for the local bus service and the impact may therefore be greater than anticipated. In the midst of a climate crisis we need to be discouraging wider car use.

We note that 44 cycle parking spaces are proposed plus a cycle path.

- We would ask that any development take into account the proposed Buckfastleigh to Ashburton mixed-use path outlined in the Sustrans proposal which has been developed in consultation with local communities and can be found here: [https://cyclesouthdartmoor.files.wordpress.com/2017/10/sustrans\\_south-dartmoor-towns\\_ashburton-to-plymouth\\_ncn2\\_feasibility-study\\_v1-0.pdf](https://cyclesouthdartmoor.files.wordpress.com/2017/10/sustrans_south-dartmoor-towns_ashburton-to-plymouth_ncn2_feasibility-study_v1-0.pdf) and in particular appendix A

from the document here:

<https://cyclesouthdartmoor.files.wordpress.com/2019/08/appendices-ab-to-sustrans-ncn2-feasibility-study-20181129.pdf>

This proposal also includes a crossing of the Dart Bridge Road and goes over Dart Bridge which could therefore be impacted by the increased traffic flow generated.

### **Homes and Affordable Housing**

We welcome the fact that this is a development that will make use of a brownfield site rather than destroying more of the natural environment of the parish.

We also note that the current proposal contains 20% of 'affordable' accommodation which we presume would mean purchase or rent at 70-80% of market rates for such a residence.

We recognise that since this is a commercial rather than a housing development, it may be able to avoid the DNPA requirement for 50% affordable housing in new residential developments but we are concerned that it will therefore not provide housing that is affordable or appropriate to the needs of the local community. It seems very likely that the accommodation will be out of reach for the vast majority of elderly Buckfastleigh residents and will be pitched at those who will sell their more valuable homes in the South East and other more affluent parts of the country. We therefore do not see that the development as it now stands provides homes needed for local people so does not benefit the local community.

At the same time, two greenfield sites are currently allocated within the parish for housing development despite it being DNPA policy to develop brownfield sites in preference to new, greenfield development.

- We would like to suggest that, since this is the only brownfield site within the parish of Buckfastleigh (and because the housing allocation for the village of Buckfast is so small), that any major development of dwellings on this site be considered as part of Buckfastleigh's allocation, takes precedence over development of current greenfield allocations within the parish and that a considerable portion of any development be truly within reach of current Buckfastleigh and Buckfast residents reflecting local housing need.

### **Environment and Sustainability**

The site is important for Buckfastleigh's highly protected population of Greater Horseshoe Bats. There are records of 800+ bats moving through this site from their roosts in the adjacent Church Hill.

- We would like to seek assurances that any development will seek to follow the very highest levels of mitigation and work with the County Council ecologist and the Devon Wildlife Trust Greater Horseshoe Bat Project to make positive environmental improvements for the bats.

Special attention needs to focus on eliminating external lighting at the site during construction as well as once the site is occupied. Increased night-time traffic movements also pose a serious threat to the bats as they move to and from their roost.

- We would like to see measures to remove this threat developed with The Devon Greater Horseshoe Bat Project.

The Town Council is aware that part of the site lies within the restricted safeguarding zone around Bullycleave Quarry.

- What mitigation will be put in place to address the impact of an industrial accident on this site?

The application states that the development will enable offset of 50% of carbon emissions, by using PV solar cells, air source heat pumps, Combined Heat & Power (and possibly water source heat pumps) + 20KW Archimedes screw. In context, however, carbon emissions of such a development would be high with high levels of laundering and heating required compared to a purely residential development.

The Sustainability and Renewable Energy Statement is extremely vague, and, in our view, proper detailed analysis should be required before any development is permitted. Estimated electricity use from the grid is 1.3MW (from the Utilities Statement) – there are no figures for gas.

- We would expect that before planning permission is given a thorough breakdown should be required, showing energy needs and how renewable sources will impact these, otherwise they may be the first things to go as costs become a concern.

We see no indication that materials utilised in construction are from sustainable resources or are of low-carbon manufacture. The carbon embodied in the initial building construction should surely be a consideration in assessing the environmental impact and therefore be assessed and taken into account.

We recognise that this development is taking on board environmental concerns but considering that historical government targets are for an 80% reduction in emissions by 2050, and in respect of the new target set in June of net zero by that date, these measures clearly do not go far enough to address climate emergency.

### **Sewage and Waste**

We note that there is an existing sewer overflow on the site that discharges direct into the River Dart and that the Kilbury treatment works also discharge untreated sewage into the river at times of high rainfall. A development of this size and nature inevitably leads to large amounts of wastewater (with high levels of laundry requirement) and sewage which may put pressure on existing infrastructure. We understand that South West Water has extra capacity, but this would surely increase the number of direct raw sewage discharge events into the River Dart, both below the proposed development and downstream at the water treatment works.

- Has the impact of other proposed developments which includes an application for a 80 bedroom hotel at Ashburton been included in this assessment?

We could not see that the disposal of waste is addressed in the application. We would anticipate large amounts of contaminated waste and single use plastic from a facility of this nature with a medical element.

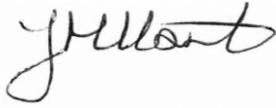
- Do current waste disposal services have capacity for this and what recycling measures will be in place to reduce landfill?

**We would also highlight that any ‘major development’ within the National Park should, as stated in the National Planning Policy Framework and the Local Plan:**

**"...be refused unless exceptional circumstances can be proved". There is no question in our minds, that by whatever definition the DNPA decide to use, this proposal constitutes a ‘major development’. It is therefore incumbent on the developers to prove that there are exceptional circumstances and that any development would provide significant affordable housing for local**

**people and/or benefits in terms of infrastructure and services. We see no sign of this in the current proposal and therefore it should be refused unless such justification is forthcoming.**

Yours sincerely,

A handwritten signature in black ink, appearing to read "J. Hart", written in a cursive style.

Judith M. Hart  
Buckfastleigh Town Clerk