

# BICKLEIGH PARISH COUNCIL

The Council Office, The Woolwell Centre, Darklake Lane, Woolwell, PL6 7TR

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## ROCKSPRING BARWOOD PLYMOUTH LTD

### BICKLEIGH PARISH COUNCIL PLANNING RESPONSE

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## INTRODUCTION

At the Full Parish Council meeting on Thursday 12<sup>th</sup> March 2020 Bickleigh Parish Council voted unanimously to object to the outline planning applications detailed below:

### **PLANNING APPLICATION REF 4185/19/OPA**

**APPLICANT:** Rockspring Barwood Plymouth Limited \*

**DESCRIPTION:** Outline application for up to 1,640 new dwellings; up to 1,200 sqm of commercial, retail and community floor space (A1 – A5, D1 and D2 uses); a new primary school; areas of public open space including a community park; attenuation basins; a primary substation and other associated site infrastructure. All matters reserved except for access.

**ADDRESS:** Land at Woolwell Part of the Lane at Woolwell JLP Allocation. Policy PLY44

### **PLANNING APPLICATION REF 4181/19/OPA**

**APPLICANT:** Rockspring Barwood Plymouth Limited

**DESCRIPTION:** Outline application for 360 dwellings and associated landscaping, new access points from Towerfield Drive and Pick Pie Drive and site infrastructure. All matters reserved except for access.

**ADDRESS:** Land at Woolwell Part of the Lane at Woolwell JLP Allocation, Policy PLY44,

Our response focusses on key areas that we consider are of considerable importance and explain in detail why we object to the planning application. These are:

- Access
- Traffic and Transport
- Climate Change
- Education
- The Housing Mix
- Community provision, including medical care
- Public Forum

## ACCESS

There are three main access points to the land included in the proposed development:

1. **Main Access** – a new roundabout on the A386 between the Roborough Recreation Hall and the Dartmoor Diner.
2. **Pick Pie Drive Access** – opening up the end of the existing road for access to the new housing development from the middle of current residential area.
3. **Towerfield Drive Access** – opening up the end of Towerfield Drive to provide access to a satellite new development of houses which will eventually join the rest of the proposed development.

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\* Throughout this document Rockspring Barwood Plymouth Limited is referred to as Barwood.

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## 1. Main access

This main access to the new development will need to be completed prior to the start of any building. We would like the developer to guarantee this.

The construction of the roundabout will cause severe delays to current traffic flow during peak periods. We would like the developer to detail how this will be managed and over what period.

The current masterplan doesn't specify how the transition from rural moorland, which is the edge of the national park, to urban fringe will be visually managed. More detail is needed on this as the presentation of the main access to the new development will be crucial in preserving the rural aspect of the area. The transition point should avoid hard boundaries. (source Tamar Valley AONB). What plans are there to sympathetically manage the new access, so it is in keeping with the current surroundings?

We would also like to understand what plans are there to preserve or replant natural hedgerows around the area of the new main access?

## 2. Pick Pie Drive Access

We do not support the Pick Pie Drive access being opened for cars to use. It will result in an unacceptable increase of commuter and heavy building traffic and its associated noise and pollution for the residents whose properties back onto this road.

There is also the very real possibility it will be used as a short cut alternative to the A386 which will result in a 'rat run' effect. This would be very detrimental for the area as increased traffic will be encouraged onto a road which already suffers congestion at peak times. Most notably the main road which runs past the existing primary school which struggles to cope with current traffic volumes during peak periods.

We would, however, be open to the idea of the proposed access at the end of Pick Pie Drive being a designated cycle and bus route with car usage only up to the new access point for existing residents.

## 3. Towerfield Drive Access

With Towerfield Drive being used by the DWP offices for parking on both sides of the road, how will the developers guarantee the safety of those cars with heavy plant machinery and building supplies being delivered on a constant basis?

How will the developers minimise the effect of the increased traffic/noise on the new Eco Village residents during the building process?

What thought has been given to the timing of when this satellite development of Towerfield Drive will join up with the main development given that when the houses become occupied the increased traffic flow along this narrow road will become unsustainable?

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## TRAFFIC AND TRANSPORT

**PLY44** says that ... *'additionally there should be no occupation of new homes until the A386 WTTG Junction Transport scheme has been implemented, with the exception of where it can be accommodated without resulting in a severe impact on the operation of the road network'*.

The road network (not just the A386 itself) is already saturated especially during peak times and during times like we have experienced when SWW were in 'residence'.

The Traffic Assessment (TA) is lacking. Highways England (not Highways Devon) have indicated a required deferment of 6 months so that the TA can be fleshed out. We welcome this request so a full analysis can be undertaken.

The TA is 212 pages long – it is impossible to read; and in our opinion a barrier to public understanding. It is dated September and October 2019.

We wish to critique the following points within the TA:

- 1.1.7 – single TA applies to whole project not just the one application
- 1.1.11 – evidence of shift in transport behaviour in particular with the younger ages. These figures are based on National Evidence – not specific to the Woolwell / Bickleigh Parish area. Young people, particularly those living in Bickleigh, will need their own transport for travelling to work. The buses to Bickleigh and beyond were reduced because they were not being used. Have Barwood spoken to the public transport Companies.
- 1.1.12 – External documents are referenced using (dated) information at various points 2012, 2014, 2017 etc. We would like to understand what the trend is now. Documents refer to need to do more research, yet the TA formed on the basis of the outdated research is being used to justify development.
- 1.1.13 – the evidence presented in the TA is dated and may not be indicative of future trends
- 1.1.14 – Many of the points in this section are possibility rather than probabilities
- 1.1.17 – DfT uses the traditional approaches to prediction. Why would this development be a test case?
- 1.1.20 – TA is a package of strategies that all need to integrate and work. We would like to understand what the contingencies are if they don't.
- 1.2.3 – All of the documents referenced are more than 2 years old
- 1.2.5 statement regarding the future capacity of road with full development. The development will only increase traffic congestion during peak hours
- 2.3.7 – Quote Darklake Lane is a private road – this is incorrect
- 2.4.1 - Advises buses service the area but they only extend to the Woolwell roundabout not Woolwell itself. References keep on being made to good connections.
- 2.4.13 Talks about commitments that are long talked about but never actioned
- 2.6.3 – referring the A38/A386 Manadon Interchange the phrase *'well trafficked'* used.
- 2.6.9 – Refer to Darklake Lane as a private road again
- 2.7 is about other schemes all stated as contributing to improvements for the development traffic. There is doubt over funding for the WTTG scheme (dismissed as poorly reported press)

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- 2.8.4 – reference to reduction in collisions due to road improvement plans
- 2.9.1 – data collection exercise undertaken in July 2016
- 2.9.4 – the traffic surveys undertaken include Manual classified counts (MCC) and the Automatic traffic counts (ATC). As they have been previously provided to Plymouth City Council and Devon County Council these surveys have not been provided. These surveys should be included in the application.
- 2.10.1 – states that Woolwell well served by buses. We do not feel this is correct. *Woolwell and Roborough have excellent bus links to a number of key local locations –* We would like this explained in more detail. Numerous traffic schemes that will enhance local road network
- 3.3.4 (5) - local facilities to support new and existing residents. Where is the evidence that existing residents want the new facilities?
- Policy 5 and 18 of the Neighbourhood Plan regarding parking is not being adhered to
- Section 4 - traffic trends. Where is all the evidence of the trends which were documented years ago?
- 4.1.11 – there is lots of information regarding younger drivers but Devon population on the more mature side and people will retain their ownership rights to cars despite the trends anyway?
- 4.2.2 – where is the evidence of Devon trends?
- 5.3.3 – more statements about excellent facilities Statement re Travel Demand Management but people will do what they want to do regardless
- 5.4.122 - BICK04 policy regarding parking has been dismissed despite ratification through inspectorate. Goes on to state that Bick04 will be overridden by what DCC and SHDC say
- 5.4.14 – apparently parking needs will be determined by relevant policies and not by residents needs
- 5.4.34 – talks about push scooters, electric skateboard, hoverboard and Segway as alternatives for transport as opposed to the car – we do not feel this is realistic
- 5.4.49 – the masterplan has been developed with bus travel in mind, but no consultation has taken place on this subject with the relevant bus companies
- 5.4.57 – proposal for bus lanes in Woolwell Road during construction
- 5.5.8 – generally considered that high speed broadband, mobile services and WIFI public access will be improved to enhance home working opportunities – tell that to Devon and Cornwall Broadband customers!!
- 5.5.21 – car sharing – we do not feel this is realistic in such a rural area.

BPC Neighbourhood Plan BICK04 - requires larger housing development proposals to include a clear statement that demonstrates how the new housing areas will contribute positively to our sustainability by relating to existing areas and the community assets (the facilities we currently enjoy), ensuring new infrastructure and facilities will be encouraged to avail themselves of the local networks, services and facilities.

BPC Neighbourhood Plan policy BICK18 – new housing development will be required to provide a minimum of two-off-road parking space for units with 1 or 2 bedrooms and a minimum of three-off-road parking spaces for units with 3 or more bedrooms. **Have Barwood taking this into consideration?**

Barwood Traffic Assessment - Emerging Evidence on Future Travel Trends

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Recurring themes reported in key evidence documents include but are not limited to the decline in car use and trip rates (especially amongst younger generations), the potential for home working and the digitisation of services to reduce car use, and influence of the built environment (i.e. the provision of sustainable infrastructure and proximity of facilities) on the likelihood of people to walk and cycle. **Although, the Council supports green issues because of the location of the development, with some of the parish being in a rural area, the practicalities of home working thereby reducing the use of the car, are not so feasible.**

The TA refers to young people, but the development does not take into account the older generation.

The building work could start at the same time. Different building contractors could be working on the development at the same time.

Barwood's Traffic Assessment is dated 2019 however some of the data is from 2012 (before the Eco Village at Roborough was built).

**As traffic assessment is based on historic data, Bickleigh Parish Council strongly recommends South Hams District Council conducts an independent, up to date, traffic assessment.**

## Page 157 of Barwood's Transport Assessment

10.5.1 Based on a combination of the trip banking exercise, residual capacity assessment and allowing for the adjustment to anticipated trip generation due to the on-site travel plan, it is concluded that up to circa 416 dwellings (i.e. 379 + 38) could form an initial phase of development that can be accommodated prior to the construction of the Woolwell to the George scheme, with an immaterial impact on baseline traffic flows at the junction.

10.5.2 This therefore demonstrates that there is potential for new dwellings to be built and occupied at the site in advance of the Woolwell to The George scheme being completed, even in the unlikely event that it was to slip a number of years.

**Justification is required demonstrating evidence supporting that the traffic can cope with a development of 416 'occupied' dwellings.**

## CLIMATE CHANGE

With reference to the following policies:

- **Bickleigh Parish Neighbourhood Plan Policy 2.6 Built Environment:** We should promote the code for sustainable homes. We should encourage the wider use of renewable energy.
- **Bickleigh Parish Neighbourhood Plan Policy BICK04 New housing development section 8.5** refers to a sustainable Urban Extension
- **National Planning Policy Framework (NPPF) 3.2:** The NPPF includes, at its heart is a presumption in favour of sustainable development.

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Following the withdrawal of the “**code for sustainable homes (CFSH)**” in 2015 we would like the developer to explain what plans are in hand to ensure sustainability is achieved in the development. We also seek to understand how the developer will **demonstrate commitment and investment to providing sustainable, low carbon design and construction.**

With reference to **Policy BICK09 housing**: Has the developer considered been given to full ‘Passive Housing’? If so, how do they plan to meet the 5 criteria of a true passive home? This approach will undoubtedly increase build costs, how, therefore, will the housing stock offered meet the affordability / low cost housing requirement.

We also wish for the developer to describe their vision for new homes that will have a positive, progressive influence on the environment and will enhance the lives of the people who move into them.

This development is of considerable size, yet we see no mention of working with and to “**BREEAM**” - why is this?

**Policy BICK12 Space Requirements**: There is much mention of woodland buffers and edgings however there is no mention of green corridors within the housing area. Can the developer quantify where all materials will be purchased and delivered from, hopefully locally sourced, to ensure un-necessary emissions due to long haul transportation are mitigated?

The developer’s report gives many “statements” with no substance or information to substantiate how the “statements” will be delivered / achieved; please could this be provided

What is the climate change strategy? There is no mention in the developers report to a climate change strategy to promote and deliver green buildings. **There is a Government initiative set a target for all new homes to have zero carbon emissions by 2016.**

**There is no mention of any protection of public rights of way or bridleways as per the joint local plan strategic policy SPT11.**

## EDUCATION

**Item 5 of PLY44** included in the Plymouth and South West Devon Joint Local Plan quotes: *“Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the area, including a new primary school and appropriate contributions to mitigate the development on secondary schools in Plymouth”.*

The planning application includes the provision of a new primary school, however there is no information on how many dwellings are required to be built before this will be opened. A secondary school is not included as it is believed that there is sufficient space at nearby schools, namely Tavistock, Ivybridge, Tor Bridge.

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**The National Planning Policy Framework** states that “the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities” (para. 72).

**Policy BICK23** of the Bickleigh Neighbourhood Plan states “...*that all local scholars have the opportunity to go to a local school*”.

With the further developments in Tavistock, Derriford, Belliver, Pinewood, and the Eco Homes at Roborough, we have concerns by the time the development is habitable, these secondary school places will no longer be available.

Plymouth Live recently reported: *The number of children applying for a place in the city has increased this year, the council says, to 3,033 children who applied on time (by October 31, 2019) for a secondary school place. The council website also advises that “The number of secondary school aged children has been in decline but after this academic year 2017/2018 the pupil roll will begin to increase.”*

<https://www.plymouth.gov.uk/childrenandfamilies/schoolseducationskillsandemployability/pupilmumbersandforecasts>

The planning application also does not mention any provision for children of pre-school age. The current nurseries within Woolwell and Roborough are already at capacity.

## HOUSING MIX

The 2017 Strategic Housing Market Assessment for the Plymouth area 21 has shown that over 50% of all new housing provided in South Hams up until 2034, should be either one or two bedroomed dwellings.

**Policy BICK10 - Housing for the Elderly** states: *“It was made clear at the Community Consultation Event in March 2016 that new housing should offer more options for local people who want to move/downsize but stay in the area. Many attendees told us that they wished to remain living in the Parish but anticipate needing something smaller and more manageable as they get older”.*

Although we accept that the size and type of dwellings will be agreed at the reserved matters stage, we would like for this to be addressed.

A policy requirement of **PLY44** is for self-build plots. There is also reference to this within Bick 15 of the Neighbourhood Plan but there is little reference to self-build plots within the planning application. Barwood, when questioned about this in the developer forum responded: *‘We know from our public consultation that some people would like self-build plots to be provided and this will be discussed further with Officers during the determination of the planning applications. We are very happy to look at opportunities to deliver these if we can see a demonstrable demand for people to purchase and deliver self-build and custom-build homes.’* However, as it is a policy requirement that these must be provided for. We wish for these to be included within the plan, and removed if there is lack of demand, not the other way.

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## COMMUNITIES – provision for communities, including medical care

### MEDICAL PROVISION

Consultation from NHS Devon Clinical Commissioning Group (CCG) states '*based upon the Devon County Council agreed planning guidance document and formula <https://www.devon.gov.uk/planning/planning-policies/other-county-policy-and-guidance> the local GP practices that would be likely to receive new patients from the development are already oversubscribed. It would be expected that the new development would create approximately a further 792 patients based upon the 2.2 occupancy rate and without any mitigation this could lead the current patient list becoming closed to new patients.*'

*The response from NHS CCG highlights the increasing demand in the following services:*

- Accident and Emergency
- Non Elective Hospital Admissions
- Elective Hospital Admissions
- Day-Case Procedures
- Outpatient Appointments
- Diagnostic Imaging
- Community Nursing

The Woolwell Medical Centre have confirmed to the Council they have concerns.

Additionally, surgeries are struggling to recruit GPs.

**BPC require further consultation with NHS CCG.** As stated in NH CCG consultee response, this is articulated in the Government's National Planning Policy Framework.

- **What discussions have taken place between Barwood & CCB (Clinical Commission Group)?** Not enough information has been provided.
- **Wider Devon Sustainability & Transformation Plan (STP) October 2016 states 'People are living longer and will require more support from the health and care system.'** - It is important that the community is informed what discussions the developers have had with CCB.
- **The CCG Plan states over the next five years they will:**
  - Ensure that plans reflect the needs of local communities
  - Engage fully with our stakeholders on future direction of travel and proposed changes to services particularly where this impacts on the number of beds available, community hospital closures, and changes to specific acute services.'
- **Neighbourhood Plan – BICK22, Health & Welfare Facilities**  
The current situation with the local health and welfare service is of growing concern

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to the Parish Council. It is felt that the current service within the Parish is running close to capacity and will not be able to cope with the demands of a growing or ageing population.

- **The 3 overarching objectives of the National Planning Policy framework are:**
  - ✓ **an economic objective**
  - ✓ **a social objective** - accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
  - ✓ **an environmental objective**
- **Although the NPPF states these objectives are not criteria which the application should be judged there is strong concern that this planning application does not address these objectives.**

**The development will incur additional pressure on the existing medical services in Bickleigh Parish.**

## RECREATION

The Council requires information on all the local groups and services who have been consulted

Although the proposal includes play provision for young children there is nothing for the youths.

## PUBLIC FORUM

### TRAFFIC CONGESTION ON THE A386

It was highlighted in the Parish Council meeting by several members of the public that the A386 simply cannot cope with additional traffic.

The Council notes that PLY44 Policy 2 states *'There should be no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network*. The Council has absolutely no doubt, that **any** building works for residential homes (whether the homes are occupied or not), will result in a severe impact on the operation of the local road network.

### TRAFFIC FLOW IN WOOLWELL ROAD

When the houses were built in Wood End Road it was supposed to be a 'rural' road. During the mornings the school run traffic is extremely busy. The Council's radar data has recorded 3600 cars have passed through Woolwell Road (over a 7 day period).

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## TRAFFIC DATA

Strong concern has been raised to the Council that the traffic data Barwood have used is over 20 years old. The data refers to young people not using own cars, which is simply not the case. Barwood have promised the community that this would be looked at.

## PYLONS

A resident queried where on the development the existing pylons are situated. If they are positioned within the 'recreational area' this is not acceptable as it will not create an area of open space or welcome natural play. There are reported health risks associated with living near pylons.<sup>1</sup>

## PHASING

A resident queried where the development would start on the site plan. We would like the developer to explain the phasing approach as this is not included within the planning application.

## CONSULTATION

The feeling is that Barwood have not completed comprehensive consultation. The community should be regularly updated with information such as how often Barwood have consulted, who they have consulted and when. During the weeks leading up to the Parish Council meeting Barwood were knocking on peoples' doors. How did Barwood randomly select the homes they would visit? What was the response rate? Has this data been published?

Although, in terms of planning consideration, this is not a material consideration, it is vital the parish (and wider community) are consulted and kept fully involved up to date with the developers plans.

## CONCLUSION

The developer has failed to address a vast number of key points within the applications and ignored several Neighbourhood Plan policies and requirements within PLY44 of the Joint Local Plan.

For these reasons, Bickleigh Parish Council object to the planning applications.

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<sup>1</sup> [https://substation-health-risks.co.uk/what-are-the-health-risks-of-living-near-pylons/?fbclid=IwAR3x0QEzFJ2OgnclSkVd62g0OX07ClxpxbaVZykAIUTDrVAd\\_S6qjYHXJKU](https://substation-health-risks.co.uk/what-are-the-health-risks-of-living-near-pylons/?fbclid=IwAR3x0QEzFJ2OgnclSkVd62g0OX07ClxpxbaVZykAIUTDrVAd_S6qjYHXJKU)