

NA3 Wolborough Masterplan Consultation Draft Summer 2018 Summary of Consultation Responses

This is a summary of the comments received to the Wolborough Development Framework Plan. Consultation took place between Friday 3rd August and Friday 28th September 2018 and included a public consultation event at Buckland Athletic Football Club.

Consultee	Summary of comments or issues	Response or proposed change
<p>Historic England</p>	<p><u>Overall</u> – DFP is positive opportunity to set clear aspirations and vision for allocated site. Evidence base to support the DFP should contain sufficient information to demonstrate that the Council has undertaken its responsibility to avoid or minimise the impact of development on the Grade 1 listed church (para 190 NPPF) and that any identified harm can be clear and convincingly justified (para 194 NPPF).</p> <p><u>Significance</u> – Important to have robust and detailed assessment of the significance of the heritage asset and how its setting contributes to the significance. This assessment needs to be completed before the DFP is adopted. HE have concerns with Heritage Strategy which the Assessment of Significance work will overcome.</p> <p><u>Infrastructure</u> – The evidence base should also include an options appraisal for the major elements of infrastructure that the DFP will establish. Should provide all evidence including discussions regarding the positioning of the road</p> <p><u>Layout</u> – It is essential that the DFP incorporates a detailed explanation of the process by which each individual parcel of land has been identified as being appropriate for development and how those decisions were reached. We would raise concerns over the quantum of development and query whether the amount proposed can be accommodated without causing an unacceptable level of harm to the significance the asset derives from its setting. Mitigation has been designed, through uses and landscaping. However, this has not been based on an understanding of the significance of the church, we would query as to whether this is the right approach to be taking and if they are sufficient to avoid or minimise the harm.</p> <p><u>SPD</u> – Document should be DPD and have as much weight as possible</p> <p><u>Background</u> – The challenges as described within the text sets out a range of issues that need to be overcome. The church and its setting is a major challenge in order to achieve development on the site that does not result in substantial harm to the asset’s significance derived from its setting. Therefore, for a successful outcome, it is important that the council is mindful of the weight given to significance as a constraint on the design process.</p>	<p>Further work has been carried out – emerging Statement of Significance and Settings Assessment for St Mary’s Church, Wolborough, Newton Abbot Work prepared in conjunction with Historic England.</p> <p><u>CHANGE</u> – Changes made to Heritage Strategy in revised Masterplan document to reflect emerging Assessment for St Mary’s</p> <p>The Revised Masterplan has not been drafted with the intention of introducing policy. It constitutes a masterplan that officers consider would be suitable in addressing the Local Plan requirement for one if</p>

	<p><u>Design Principles</u> - In the absence of the Statement of Significance/Setting Assessment for the church we are unable to provide detailed advice at this stage on these issues or regarding whether proposed mitigation strategies might potentially be considered appropriate.</p>	<p>submitted with planning applications at Wolborough.</p>
<p>Natural England</p>	<p>Objects to Plan. As drafted consider it will damage or destroy the interest features for which Wolborough Fen Site of Special Scientific Interest has been notified.</p> <p>Describes South Hams Special Area or Conservation including Strategic Flyways and Pinchpoints</p> <p>Describes Site of Special Scientific Interest and need to protect and enhance as set out in Local Plan</p> <p><u>Supporting plans/maps</u> Plans/maps fail to recognise complexity and uncertainty surrounding the function of the ecohydrological system that supports the SSSI. Important to be clear that development within these areas is conditional upon evidence based approach, that provides reliable understanding of the catchment to inform suitability of development. Clear regarding this point to avoid potential misinterpretation.</p> <p><u>Part 1: The Objectives</u> Support “make sure net gains for other biodiversity while achieving multifunctional green infrastructure benefits”. In accordance with NPPF and should be based upon the use of a recognised biodiversity metric.</p> <p><u>Movement Strategy</u> Where required and subject to the identification of commuting corridors, suitable features will need to be incorporated into the road network to allow safe and unhindered movement of greater horseshoe bats</p> <p><u>Density Strategy</u> Does not take into consideration potential risk to Wolborough Fen SSSI, and appears to restrict opportunities to mitigate potential hydrological and recreational impacts. The density strategy should recognise this potential constraint.</p> <p><u>Landscape (green infrastructure) strategy</u></p>	<p>On-going discussion between TDC and NE between Consultation Draft and publication of revised document to produce Revised Document</p> <p><u>CHANGE</u> – Amend map ‘Dev Framework Map’ to show Fen catchment. Add note below key to say “development within the fen catchment is conditional upon evidence”</p> <p><u>CHANGE</u> – add “based on the use of a recognised biodiversity metric”</p> <p><u>CHANGE</u> – Add this text</p> <p><u>CHANGE</u> – Density Strategy removed however, this consideration has been included in Land Use Strategy text</p> <p><u>CHANGE</u> – Add text “These links will be subject further evidence</p>

<p>Subject to the identification of appropriate corridors through an evidenced based approach (based on reliable survey), welcome proposals to provide green wildlife links for greater horseshoe bats. Green links to support greater horseshoe bats are indicative</p> <p>Incorporate objectives to maintain and enhance the SSSI, that will be achieved through appropriate land use within the SSSI hydrological catchment, and consideration of potential recreational impacts upon the SSSI (e.g. nutrient enrichment associated with dog fouling</p> <p>In advance of facilitating access to the existing woodland, biodiversity impacts will require full consideration</p> <p><u>Greater Horseshoe Bat design framework</u> HRA refers to mapping of four bespoke GHB roosts</p> <p>Illustrative plan shows plating to encourage bats to fly over the roads. Proposal is not based upon behaviour of low flying species such as GHB, and is contrary to Design Principles provided in HRA. This type of mitigation is inappropriate to address severance impacts associated with new roads upon GHB activity</p> <p>Long term habitat management will need to be based upon the duration of impact. Habitat management will need to be in-perpetuity where the impacts are permanent and irreversible</p> <p><u>Drainage Strategy and Appendix A – Wolborough Fen Monitoring Strategy</u> - Construction impacts -Spatial distribution of recharge within the groundwater catchment to the west of the</p>	<p>but are indicated on the landscape strategy map”</p> <p><u>CHANGE</u> – A response to potential recreational impacts on the Wolborough Fen SSSI associated with nutrification</p> <p><u>CHANGE</u> – Addressing the interaction between additional public access to woodland and associated biodiversity impacts</p> <p>This was a drafting error and should have referred to two roosts as shown on the Greater Horseshoe Bat Design Framework map.</p> <p><u>CHANGE</u> – Remove illustration on page 25 (Greater Horseshoe Bat Design Framework). A bespoke approach will be required through planning applications</p> <p><u>CHANGE</u> – Text on page 25 amended accordingly</p> <p>Comments reviewed by TDC Drainage Officer and Natural England re-consulted. On-going discussion between Consultation Draft and publication of Revised</p>
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	<p>SSSI</p> <ul style="list-style-type: none"> - A likely increase in the amount of water that can be fed by infiltration into the groundwater to drain into the SSSI - Emergency overflow from infiltration basins/attenuation ponds - Reference to the proposed development layout - Level of detail provided in the <i>Wolborough Fen Monitoring Strategy</i> - Method for monitoring groundwater levels - Possible extension of monitoring following atypical seasonal rainfall <p><u>HRA</u> Detailed advice provided for attention and action</p> <p><u>SEA</u> Section 2.6 Table 1 should read ‘no adverse effect upon the integrity of the Natura 2000 site “Further assessment on the potential impacts of these will be required especially in relation to the SSSI to ensure any development does not detrimentally impact its hydrology” – this is not consistent with Local Plan policy</p>	<p>document to produce the revised Drainage Strategy and Monitoring Strategy.</p> <p>The masterplan is not a Local Development Document. HRA not included alongside the revised Masterplan.</p> <p>The masterplan is not a Local Development Document. SEA not included alongside the revised Masterplan.</p>
<p>Natural England Additional comments</p>	<ul style="list-style-type: none"> • Plan on page 10: amend Legend Note to “Development within the Wolborough Fen SSSI hydrological catchment is conditional upon evidence.” • Also, amend legend to “Development area – Residential (indicative)”. • Section 3.2 needs to reflect this by adding a bullet point along the lines of: “In order to ensure that proposals safeguard and enhance Wolborough Fen SSSI, development within the SSSI hydrological catchment will be subject to a robust evidence base that can be utilised to rule out detrimental impacts” 	<p>Propose amend SSSI Surface Water Catchment label to read ‘SSSI Surface Water Catchment – development subject to robust drainage mitigation’</p> <p>Disagree – the masterplan is already marked ‘illustrative’ and reflects the allocation</p> <p>Insert new bullet point at 3.2 (page 11): ‘Development within the SSSI hydrological catchment will be subject to a robust evidence base that can be utilised</p>

	<ul style="list-style-type: none"> Is it appropriate for the “Context Plan” on page 6 to indicate areas subject to potential development? It would appear that the “Context Plan” is to illustrate the current baseline, and on that basis should not include indicative development areas (or green infrastructure). Section 1.11 refers to the “context plan” on page 8. However the plan on page 8 has no legend and does not appear to relate to context or the constraints summarised on page 7. Under Sections 3.32 and 3.35, a further point/sentence needs to be added to emphasise that the landscape plan may require amendment further to evidence gathered to better understand the Wolborough Fen SSSI ecohydrology. Page 24: amend Legend to “Development parcel (indicative)”. Similarly, pages 32, 34, and 36. 	<p>to protect and enhance Wolborough Fen through an appropriate drainage strategy’</p> <p>It doesn’t directly show development areas but does show GI. To provide clarity, NA3 GI deleted from mapping but KK4 (outside of the allocation) retained.</p> <p>Insert new 3.49 ‘As outlined above, this illustrative landscape strategy may be subject to changes associated with a more detailed understanding of associated matters, include wildlife links and Wolborough Fen SSSI hydrology.’</p> <p>Mark all plans ‘indicative’</p>
<p>Environment Agency</p>	<p>Broadly supportive of the approach.</p> <p>Neighbourhoods 2, 3 and 4 all include small watercourses flowing through them. Pleased to see that these watercourses, along with sustainable drainage features and flow routes have been incorporated into green infrastructure.</p> <p>Welcome commitment to monitoring of Wolborough Fen before, during and after construction. Lowland Fens are listed as a Priority Habitat for which the Environment Agency is the lead partner. Nonetheless, because Wolborough Fen is also designated as a Site of Special Scientific Interest Natural England are the competent authority for commenting on impacts to the site. Likewise we are pleased that the groundwater monitoring strategy will inform the sustainable drainage strategy within this catchment which covers the southern half of proposed neighbourhood 2.</p> <p>Neighbourhood 1 includes an area of former landfill. The masterplan indicates that allotments will cover most of this area with some areas of development. The exact nature and extent of landfill needs to be fully understood and a remediation strategy developed as appropriate to ensure that development does not cause</p>	<p>Noted and welcome. We will continue to engage with Natural England.</p>

	<p>pollution of the water environment.</p> <p>In addition Neighbourhood 4 surrounds another area of former landfill. Any risks of contamination from this former landfill site to adjacent development will need to be properly investigated.</p>	
South West Water	<p>Passed to our Asset Planning Department to allow them to programme any improvements to our infrastructure to ensure able to meet the additional demands upon it.</p> <p>It would be of assistance if at the earliest opportunity an indication of the anticipated build programme and phasing of the development could be provided to assist in our planning and timing of any improvements.</p>	Noted. We will continue to liaise with South West Water over development programmes and timescales, including at Wolborough.
National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Wolborough Development Framework Plan area.</p>	Noted.
Marine Management Organisation	<p>The Marine Management Organisation is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife Marine licensing. No specific comments.</p>	Noted.
England Hockey	<p>It states under the Open Space section that there is a plan to build a new MUGA facility in Neighbourhood 1 over 2.300sqm. However there is no mention of this facility in the Strategic Environmental Assessment.</p> <p>There is no design specifications for the MUGA, so unable to comment on the strategic need for hockey. What surface will the MUGA be ie 3G or sand based, floodlights or no lights? Need to ensure that this MUGA facility meets the National Governing Body design specification to ensure maximum community use. There is mention of use of community parking and toilet facilities. What ancillary facilities will be aligned to the MUGA in regards to changing and hospitality? Will the Community facility include a small club house?</p> <p>There is demand for a new sand AGP on the A38 corridor, where Stover School has been one site agreed. England Hockey would like to see:</p> <ol style="list-style-type: none"> 1. Possible off-site contributions to Stover project or, 2. Possible Hockey Plus surface at secondary school for multi-sport activity (Hockey Plus is a new technical specification for surface from England Hockey). 	<p>In line with the 2018 playing pitch strategy, the masterplan's MUGA proposals are not orientated towards a specific hockey facility.</p> <p>Teignbridge will continue to help facilitate the new hockey facility that England Hockey describe.</p>
Sport England	<p>All new dwellings in Wolborough in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p>	The masterplan identifies an opportunity for a single informal playing pitch in Neighbourhood 1.

	<p>Neighbourhood 1 appears to contain a single playing pitch on a challenging site (topography). Type of playing pitch? Ancillary provision? Co-location considered? Single pitch sites are a challenge to manage and be financially sustainable.</p> <p>Nothing planned in Neighbourhoods 2 & 3.</p> <p>Neighbourhood 4 surrounds an existing playing field site with no on-site provision. Will there be enhancements to the existing site? Formalised community access to the proposed school playing and sports facilities? Sport England would encourage development in Wolborough be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.</p>	<p>The Wolborough allocation is, however surrounded by various playing pitches and, in accordance with the playing pitch strategy, it is likely that the Local Plan playing pitch requirements will be addressed through financial contributions to upgrades identified in that strategy</p>
<p>Devon County Council</p>	<p>The Development Framework Plan (Education)</p> <p><u>Site locations</u> – Identification of both primary and secondary provision is welcomed. Primary school close to community centre appropriate. Secondary provision may be better placed on edge of development rather than bordered by built environment.</p> <p><u>Delivery timescale</u> – The timescales for development delivery are considered to be appropriate for the current strategy but may require amendment should CIL funding not be forthcoming or development across the town is delivered at faster rate than anticipated.</p> <p>Movement Strategy (Highways)</p> <p><u>Overall</u> – Supports positive approach taken to respond to requirement for masterplan</p> <p><u>Movement Strategy</u> – Refer to potential traffic impact of the development upon Stonemans Hill and Coach Road before the through route is completed. These roads are currently not of appropriate standard to accommodate significant additional traffic and may require improvements.</p> <p><u>Connecting Streets and Green Links</u> – The Government published ‘Inclusive Transport Strategy’ in July 2018 which aims to raise awareness and provision of appropriate inclusive physical infrastructure to enable disabled people to negotiate public spaces. Shared surfaces in residential streets can, subject to all other matters being satisfactory, be included within the adoptable areas of proposed Section 38 agreements.</p> <p><u>General</u> – Support the enhancement of existing footpaths</p> <p><u>Bus route</u></p>	<p>Education</p> <p>Noted. The land identified for secondary provision is in public control, which will be a significant benefit when delivering an education facility.</p> <p>Movement Strategy</p> <p>Agree</p> <p><u>CHANGE</u> – additional text in Movement strategy paragraph 3.15</p> <p><u>CHANGE</u> – addition to ‘tertiary streets’ section to reflect the Inclusive Transport Strategy.</p> <p>Welcome. Off-site upgrades may be appropriate.</p>

<p>Supportive of provision of a new or extended regular bus route to serve the development and provide links to surrounding areas and town centre. It is anticipated that the through-route will provide a suitable route for a bus service providing accessibility across the site; it is therefore necessary that the route is of suitable width and design to allow for the movement of buses. In order to promote sustainable transport, the bus route would be required at an early stage in the development to influence travel behaviour. Reference within the document to the provision of bus stops within a maximum walking distance of 400m is welcomed.</p> <p>The County Council is committed to working together with the District Council and the service providers to work towards the introduction of a bus service to serve development across Newton Abbot and will seek financial contributions from development towards achieving this. Early discussions have already taken place with Stagecoach regarding the vision for bus services across the town including at NA3.</p> <p>Drainage Strategy (Flood Risk)</p> <p>Para 3.49 (b) It is unclear which area this statement refers to – the area at the industrial estate or the area adjacent to it? It should be explained as to why infiltration is not an option here given that the water will be discharging to the Aller Brook to the west of the site.</p> <p>Heritage Strategy (Historic Environment)</p> <p>The archaeological potential for the site is referenced in paragraph 3.64, but there is no strategy set out or reference to any mitigation measures that will be implemented, how any heritage assets with archaeological interest will be protected or enhanced by the development or how any heritage assets that are present may influence design or layout of the development of this area.</p> <p>A geophysical survey has been undertaken of a large part of the area but, to date, the County Historic Environment Team is unaware of any intrusive archaeological field evaluation being undertaken to test the efficacy of the survey and to enable an understanding of the significance of any heritage assets present that will be affected by development.</p> <p>The County Council therefore advise that any Masterplan for development, including Green Infrastructure, is supported and informed by the results of a full programme of archaeological work, namely the results of the geophysical survey and a field evaluation.</p> <p>Economy</p> <p><u>Employment space</u> – Supportive of requirement for high quality employment space to be provided across the allocation including B1, B2 and B8 space. Newton Abbot has a large existing B8 offering; it should be ensured</p>	<p><u>CHANGE</u> – insert, ‘The County Council is committed to working together with the District Council and the service providers to work towards the introduction of a bus service to serve this development as part of a strategy for development across Newton Abbot and has underlined the importance of early main street delivery.</p> <p>Drainage Strategy amended following comments from NE</p> <p><u>CHANGE</u> –Heritage Strategy amended accordingly</p> <p>Noted.</p>
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<p>that any provision of B8 space is fully justified. There is a significant local demand for small scale B1 and B2 units</p> <p><u>Renewable Energy</u> – Local Plan aspiration to maximise opportunities for the generation on-site renewable energy is welcomed. It would be helpful for the framework to place a greater emphasis on the requirement to investigate the potential for inclusion of renewable at a domestic and community scale than it currently does. Reference could also be made to the inclusion of renewable energy and energy efficiency within building and public space.</p> <p>Minerals and Waste</p> <p><u>General</u> - The document does not consider the overlap of the development areas with the Mineral Safeguarding Area or para 7.37 of the Local Plan which encourages pre-development extraction of sand and gravel. Clear advice should be included in the document on the requirement for the scope of prior extraction to be investigated as part of any planning application in accordance with policies M2 and M3 of Devon Minerals Plan</p> <p><u>General</u> – The Framework Plan should include reference to Policy W4 of the Devon Waste Plan and the need for planning applications to include a Waste Audit Statement that addresses the sustainable management of waste from the construction and operational stages.</p> <p><u>Introduction</u> - The Framework Plan should reference the relevant policies in the Devon Minerals Plan and Devon Waste Plan that form part of the development plan.</p> <p><u>Map (page 8)</u> - The map should identify the Mineral Safeguarding Area (subject to an appropriate copyright statement).</p> <p><u>Key Challenges and Opportunities</u> - Under ‘site features and ecology’, reference should be made to the fact that the site overlies Aller Gravels that are a potential mineral resource.</p> <p>SEA Screening Statement</p> <p>D Resource Use - It is incorrectly stated that the site is not within a Mineral Consultation Area. Almost all of the proposed development areas are within a Mineral Consultation Area.</p> <p>D Resource Use - Statement suggests that the draft framework directs employment land to the Mineral Safeguarding Area (MSA). This is incorrect as the proposed employment land allocations are all located outside</p>	<p>MINERALS AND WASTE</p> <p><u>CHANGE</u> – Include reference to policies M2 and M3 of Devon Minerals Plan. Prior extraction provisions also referred to in Site Challenges section.</p> <p><u>CHANGE</u> – Agree include reference to W4</p> <p>As above</p> <p><u>CHANGE</u> – Include Mineral Consultation Area on Context Plan</p> <p><u>CHANGE</u> – Agree. This change has been made.</p> <p>This matter has been addressed but the masterplan is not yet a Local Development Document. Revised SEA not included alongside the revised Masterplan.</p>
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	<p>of the MSA. Additionally, the document does not mention that a large proportion of the housing land allocations are within the MSA and should address the encouragement given by paragraph 7.37 of the Teignbridge Local Plan for prior extraction of the underlying mineral resource.</p>	
<p>Devon County Council (Part 2)</p>	<p><u>Shared Space</u> In comment no.2 of previous response, the County Council made comments regarding the Government’s ‘Inclusive Transport Strategy’ published in July 2018 which raises concerns regarding the increased use of shared space schemes and the impact of this upon visually impaired people. As a result of this strategy, the County Council had been advised to pause the introduction and adoption of new shared space schemes.</p> <p>Since the submission of the previous response, further clarification has been provided by both the Transport and Planning Ministers stating that the advice given to pause all shared space scheme applies to areas of high traffic rather than to housing developments and residential streets. Whilst planning authorities need to ensure that all schemes are designed with the needs of different users in mind, the focus of the pause is on level-surface schemes in areas with relatively large amounts of pedestrian and vehicular movement such as high streets and town centres.</p> <p>In terms of the implications of this upon the Wolborough allocation, shared surfaces in residential streets can, subject to all other matters being satisfactory, be included within the adoptable areas of proposed Section 38 agreements. Until the results of the impending DfT research are known and this can be revisited, shared spaces within areas of high traffic such as town centres will not be included within the adoptable areas.</p> <p><u>Bus Services</u> The County Council is supportive of the provision of a new or extended regular bus route to serve the development and provide links to the surrounding areas and town centre. It is anticipated that the through-route will provide a suitable route for a bus service providing accessibility across the site; it is therefore necessary that the route is of suitable width and design to allow for the movement of buses. In order to promote sustainable transport, the bus route would be required at an early stage in the development to influence travel behaviour. Reference within the document to the provision of bus stops within a maximum walking distance of 400m is welcomed.</p> <p>The County Council is committed to working together with the District Council and the service providers to work towards the introduction of a bus service to serve development across Newton Abbot and will seek</p>	<p><u>CHANGE</u> – Include in movement Strategy</p>

	financial contributions from development towards achieving this. Early discussions have already taken place with Stagecoach regarding the vision for bus services across the town including at NA3.	
Devon Countryside Access Forum	No specific comments. Many of the Framework policies and associated details accord with the Forum's vision for sustainable transport and recreational access. Forwarded Forum's position statements on planning and disability access to inform the future development of this site.	Noted.
PCL Planning (representing landowner to west of NA3 allocation)	<p>Process Offer to work with the Council in order to redraft Development Framework fails to take into account evidence which underpins the planning application. Proposed masterplan is poor quality and has failed to secure effective engagement of client. It's a draft DPD, not an SPD.</p> <p>Assessment of Significance St Mary's Church, Wolborough should have been prepared ahead of Consultation Draft DFP</p> <p>Draft HRA does not consider information contained in ES submitted on behalf of our clients. Representation to the recent Devon County Council Greater Horseshoe Bat consultation document appended. No significant impact upon the SAC can arise as result of Development on the NA3 site.</p> <p>Development Framework Map <u>Employment land on Totnes Rd</u> - Increase in the employment land adjacent to Totnes Rd creates a significant constraint on viability, is impractical, poorly located, creates inappropriate movement through the neighbourhood and be undeliverable at the scale and extent suggested. Some employment on made-up land and closer to Abbotskerswell. Housing pushed further up the slope onto land that is more difficult and more visible.</p>	<p>Welcome. We have fully engaged with the landowner and other stakeholders throughout production of the masterplan. This has included recent meetings about the content of the draft masterplan.</p> <p>The approach taken was agreed through careful dialogue with Historic England, who are members of the project team for the Assessment.</p> <p>This data was drawn on in preparing the draft masterplan, which the draft HRA subsequently responded to.</p> <p><u>CHANGE</u> - Revised map includes shading to indicate that employment land could be provided elsewhere if an</p>

	<p><u>Two access points from Totnes Road</u>- Additional vehicle access from the site onto Totnes Road is not viable or necessary</p> <p>Development Principles - Restricting land with a gradient no steeper than 1 in 6 is surprising as such development is common in Teignbridge.</p> <p>Movement Strategy 3.7–3.10 focus on road design and how this would relate to development. This is important in order to create an integrated relationship between the two. Poor integration of main street in to developed areas. Tangle of primary, secondary, tertiary streets does not set out a cogent design strategy for place design.</p> <p>Density Strategy</p>	<p>appropriate solution can be identified. We have seen no evidence to support a viability case. The access points illustrate one way of serving all of Neighbourhood 1. It may be feasible to arrive at a layout with a single access point that meets the needs of all development uses.</p> <p>Objectives section amended to reflect scope for innovative approaches to steeper slopes, which is already addressed in the Density strategy and land use section.</p> <p>The illustrative masterplan responds to the importance of an integrated relationship between the main street and development parcels, following a series of workshops and discussions between designers and engineers, including representatives of the allocation’s main land owners.</p> <p>The illustrative road network reflects the topographic challenges of the site.</p>
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	<p>Higher density around Neighbourhood Hub. 25dph is a satisfactory device in itself for securing high quality townscape/ place making adjacent to link road, primary school and local centre. Difficult to understand from place making perspective. Suggest density levels should not be limited to low levels as higher densities can make better use of land. Higher density housing in the centre important in achieving this. Danger that exclusively non-residential areas at the heart of the neighbourhood will generate poor place-making. Creating a mixed-use centre including housing will help to secure a more rounded and balanced centre</p> <p>Landuse Strategy <u>Net residential area</u> - Reduces the overall developable area for residential across Anthony Rew’s landholding (over 6 hectares). Significant reduction on housing contrary to allocation.</p> <p>Landscape Strategy Landscape strategy around local centre result in fragmented place where road is separated from housing which is separated from local centre which is separated from school. Simple standing back from Church outside areas of allocated for housing is not sound basis for credible focus.</p>	<p>Description amended to reflect the scope for a high density of properties, even in low density character areas.</p> <p>Potential to accommodate residential uses within neighbourhood hub area reflected in housing objectives.</p> <p>Draft design codes not published with the revised masterplan in order to underline the flexibility that exists in relation to this and similar matters.</p> <p>The illustrative masterplan has been prepared with reference to more detailed analysis of the topography and historic environment context of the site. The masterplan is not prescriptive and recognises that innovative solutions to addressing these matters may result in additional development coming forward.</p> <p>Potential to accommodate residential uses within neighbourhood hub reflected further within the document. A</p>
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	<p>Drainage Strategy - The reduction in area that is able to deal with drainage requirements associated with Wolborough Fen is questioned as are the proposed locations for attenuation on land adjacent to Totnes Road. Is there sufficient land between the development areas and the SSSI? Location of attenuation in Neighbourhood 1 is questioned. Is there sufficient water storage capacity in the suggested strategy?</p> <p>Heritage Strategy Suggest density not best tool for achieving good quality around the church. Concerned moving the link road further south – away from church- will make it more prominent due to engineering works required in order to deal with topography.</p> <p>Main Street Design <u>Link road alignment</u> – moved 25 metres south for PCL’ suggested alignment. This will make construction more difficult make the road more visible in the landscape. Change in alignment between proposed school and the woodland will make it more difficult to develop parcels to south. East of woodland will result in cut and fill. Poor integration of main street into developed areas. Tangle of Primary, secondary, tertiary streets does not set out a cogent design strategy for place design. Changes in alignment from that proposed by PCL are questioned. Focus in guidance is on road design rather than integration of road with development and forming quality public realm.</p> <p>Part 3 – Design Code</p>	<p>Statement of Significance and Settings Assessment has been prepared in partnership with Historic England and has guided the revised masterplan.</p> <p>Drainage Strategy Principles agreed with Natural England</p> <p>The revised masterplan is now orientated towards density character, rather than specifically dwelling numbers. A Statement of Significance and Settings Assessment has been prepared in partnership with Historic England and has guided the revised masterplan.</p> <p>The illustrative masterplan’s road alignment was developed as a result of a series of workshops and discussions between designers and engineers, including representatives of the allocation’s main land owners. A Statement of Significance and Settings Assessment has been prepared in partnership with Historic England and has guided</p>
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	<p><u>Link Road character</u> - Proposed guidance will not result in high quality street. Central spine is about 1.5km long. The guidelines do not address different characters along length of corridor. Illustrative section on page 44 represents poor utilitarian solution.</p> <p><u>Connecting Street</u> – utilitarian design solution.</p> <p><u>Neighbourhood Hub</u></p> <p>Should be kept open for more detailed designed stage. Object to significant reduction in housing around Local Centre.</p> <p>Do not demonstrate how high quality environment developed in heart of neighbourhood. Central Spine isolated from development. Mixed uses and high quality.</p> <p><u>Neighbourhood 1</u> – concern regarding extent extent of employment. Inadequate sense of vision or quality of place.</p> <p><u>Neighbourhood 2</u> – concern about illustrative layout.</p>	<p>the revised masterplan, including the road alignment.</p> <p>Design Code removed from document. Detailed design across the allocation will need to respond to Local Plan policy and associated design guidance</p>
<p>Turley (on behalf of CEG) (representing landowner to east of NA3 allocation)</p>	<p>The draft DFP needs to be as flexible as possible to be able to adapt to changing economic and social circumstances during the life of the development, and accommodate a masterplan in an application submission which is based on more detailed evidence than exists in the evidence base of the DFP. This is certainly best fulfilled as a non-SPD guidance document which can be flexible, reviewed and revised if required as development progresses (if there is any need for revision as all.)</p> <p>Request the DFP is fundamentally re-drafted to reflect the emerging proposals on the CEG land at Langford Bridge Farm and address the emerging conflict in the two masterplans for the site, before providing opportunity for further review prior to adoption.</p> <p>Summary of suggested main changes –</p> <ul style="list-style-type: none"> - Reduce scope of document, including removal of Design Code and removal of Infrastructure Delivery Plan 	<p>The Revised Masterplan has not been drafted with the intention of introducing policy. It constitutes a masterplan that officers consider would be suitable in addressing the Local Plan requirement for one if submitted with planning applications at Wolborough.</p> <p>Masterplan has been re-drafted taking on board many of suggested changes</p>

	<ul style="list-style-type: none"> - Reduce amount of detail in ALL sections of document and make clear all masterplanning consideration can be subject to change at later stages - Reconsider balance of employment uses across the wider allocation - Remove requirement for 50m corridor within strategic flyway, include recognition that the indicative corridors may need to be refined at the planning stage and that alternative planning proposals will be considered <p>Edit down and reduce the overall content and scope of the DFP, by</p> <ul style="list-style-type: none"> - Ensuring the DFP does not contain untested and unjustified policies which is intended to be used to determine planning applications for development proposed in accordance with Policy NA3 - Remove Infrastructure Delivery Plan - Remove of Employment section on page 17 - Remove section which prescribes requirements where further detailed evidence will be submitted as part of a planning application on site (drainage, highways, landscape) - Status as Non-SPD guidance document and not an SPD - Remove Codes - Remove specific measurements within the detailed text and “Code” - DFP goes into a lot of detail. Ensure no repetition and no conflicting statements - Should be stated as illustrative and heavily caveated to allow for flexibility in compliance. - Applications may differ from DFP and be implemented as appropriate to location - Amend Density scopes - Removal of quantum indicated for electricity sub-station - Flexibility in delivery of infrastructure requirement - Indicative Flyway corridors may need to be refined - Remove or re-orientate location of strategic Cycle Route D - Indicate flood attenuation can be located within Parcel S2 - Remove green link running north-south through Neighbourhood 4, to west of Kingskerswell Road - Remove all annotations of connecting streets, any specification of road widths. <p>Further detailed comments provided in - Appendix 3 Design Critique</p> <p>Infrastructure Schedule Comments on Employment, Housing, Through route, Open Spaces, Local Centre, Education.</p>	
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	<p>Consider approach taken by DFP to attempt to prescribe and secure infrastructure fundamentally unlawful and will legally challenge the adoption of any document which includes these requirements. We request the deletion of the Infrastructure Delivery Plan and Employment Obligation section, from the draft DFP to enable to proceed to adoption.</p> <p>Separately, further detailed comments provided regarding the Infrastructure Delivery Plan</p>	
<p>Vectos (representing landowner outside the allocation, to the south of Priory Road)</p>	<p>Main Street Design Provide a more direct route between the A380 South Devon Link Road and the A381. Consistent with the route shown in the Local Plan Framework should consider;</p> <ul style="list-style-type: none"> • Assessment of the impacts of routing through the development, both with and without the bridge crossing proposals in place committed through CIL • Revised assessment of highway infrastructure through the NA3 allocation 	<p>Main Street Design agreed with Devon County Council and through a series of workshops with various transport engineers.</p>
<p>Devon CPRE</p>	<p>Process Given the sensitive and complex nature of developing NA3, recommend robust and comprehensive DPD should be produced, consulted on and examined by the Planning Inspectorate. Concerned about statements in paras 1.4 and 3.2 that “it may also be possible to bring forward development based on an alternative developer-led comprehensive masterplan for the whole allocation”. This would not meet the requirement to have an overarching set of detailed principles produced by the Local Planning Authority (LPA) and endorsed by community consultation, to inform developers and to ensure that future development of Wolborough Barton is appropriate to its surroundings and contributes to the necessary infrastructure improvements. An LPA-produced DPD is essential to ensure a well thought out approach to the strategic development of this allocated site.</p> <p>Landscape Strategy – Welcomed <u>Cirl Buntings</u> – Further study needs to be undertaken to ascertain accurately the population which is present on NA3. Paragraph 3.35 refers to habitat connectivity via the network of retained vegetation and the need to avoid and mitigate the impacts on Cirl Buntings. However, some of the land in NA3 has already been used in mitigation for the construction of the South Devon Link Road. How many times can payments be made to mitigate the loss of habitats for Cirl Buntings before there is no suitable land left for them? Further study needs to be undertaken to ascertain accurately the population which is present on NA3.</p>	<p>The Revised Masterplan has not been drafted with the intention of introducing policy. It constitutes a masterplan that officers consider would be suitable in addressing the Local Plan requirement for one if submitted with planning applications at Wolborough.</p> <p>Further studies will need to be provided at planning application stage.</p>

	<p>Comprehensive surveys are essential to make outcome of development on groundwater quality, quantity and reliability better understood to ensure long term viability of the operation of Wolborough Fen as set out in Para 3.43.</p> <p>3.48 No less than 6 people and/or organisations involved in ongoing maintenance of the SUDS. There must be a single individual (person or individual) responsible for the six element who report to the Council at regular intervals. Relying on residents is particularly worrying question whether or such obligation legally enforceable or would be effective. Resources must be identified for the ongoing monitoring of the effectiveness of the drainage measures.</p> <p>Extract provided from Royal Haskoning DHV December 2016 a range of requirements and recommendations were made. para 2.1.2.1.</p> <p>The report set out the requirements for a drainage strategy in para. 2.1.3.5. The DFP has adopted the minimum monitoring and dataset recommendations described in the RH report. However, adopting minimum requirements will not provide a monitoring strategy that will uphold the high aspirations of that required in the RH report. It must surely be incumbent on TDC to adopt the highest level of protection envisioned in the RH report and include these standards within the Draft DFP, so that the aims of the drainage strategy and para. 3.43 for the Wolborough Fen SSSI can be met.</p> <p>Heritage Strategy The assessment by Historic England should be given greater weight in the DFP and more robust mitigation measures should be adopted if St Marys setting is to be adequately protected so that future generations can appreciate its significance in the landscape</p>	<p>Further work has been carried out – Statement of significance and Settings Assessment for St Mary’s Church, Wolborough, Newton Abbot Work prepared in conjunction with Historic England.</p> <p><u>CHANGE</u> – Responding to emerging work carried out as part of the St Mary’s Assessment, changes made to Heritage Strategy in revised Masterplan document</p>
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	<p>Main Street Design</p> <p>Early delivery of the link road between the A380 and the A381 should be a prerequisite of any development. Already the infrastructure in and around Newton Abbot is at breaking point; the volume of traffic using Coach Road and other lanes around Abbotskerswell is excessive, damaging the highway and private property, and putting pedestrians and cyclists at considerable risk. Any further increase in traffic would be disastrous. However, it is a road that cannot be extended to meet up with the A382 and thus, is likely to increase the pressure on the lanes to the north west of the A381 as drivers try to avoid Newton Abbot’s notorious traffic hold-ups. This detracts from its proposed use as a southern by-pass for the town. Thus it may not fulfil the policy in the Local Plan which states: “The provision of the road is critical to the creation of a sustainable transport network through the site and to improve the overall movement corridors across the town.”</p> <p>Devon County Council have commented previously that “without certainty that the route can be delivered in its entirety at an early stage in the development of the allocation, the proposed development is considered to be unacceptable for traffic impact and air quality reasons towards the centre of Newton Abbot as well as for pedestrians and cycles.”</p> <p>The DFP needs to include a greater acknowledgement of the difficulties and propose solutions in securing an early delivery of the by-pass.</p>	<p>The DFP seeks delivery of the through route at the earliest possible stage in order to address concerns surrounding the impact of increased traffic on local roads and accessibility across the allocation</p>
<p>Devon Wildlife Trust</p>	<p><u>HRA</u></p> <p>Disagree with conclusions in para 8.4, believe the allocations will result in adverse effects on integrity of south hams SAC. For following reasons:</p> <p><u>GHB Foraging Habitat</u></p> <p>Table 2 does not include ‘net loss of areas of GHB foraging habitat. Large areas of foraging habitat (mainly cattle grazed grassland) will be lost and replaced by development. HRA does not properly address mitigation for net loss of foraging habitat.</p> <p>As a minimum requirement, suggested similar wording used for foraging habitat ‘Design Principle’. DFP revised to show how no net loss of GHB foraging habitat will be achieved. In light of NPPF para 170, 174 expect LPA to press for a <u>measurable ‘net gain’</u> in GHB foraging and commuting habitat.</p> <p><u>GHB commuting habitat connectivity</u></p> <p>DFP will adversely affect GHB commuting habitat and consequent GHB movement.</p> <p>On Land Use Plan residential development at area R9 and education land at area S2 creates a Pinch Point hindering GHB north-south movement along Predicted Flight Line. Further exacerbated by Main Street running</p>	<p>No objection from Natural England regarding the indicative Greater Horseshoe Bat strategy.</p>

	<p>east-west. Revise Land Use Plan to remove potential Pinch Point by significantly setting back proposed development adjacent to GHB corridor addressing likely adverse effects of Main Street alignment. Strategic Flyway at area R17 narrow band of green space result in pinch Point for GHB movement. Para 3.40 -Width of 'secondary corridors' only 10 to 20 metres. Too narrow. Widths for 'secondary corridors' should be minimum 30 metres.</p> <p>Following should be increased to minimum of 30 metres: 10 metre buffer between industrial units and hedge/tree in neighbourhood 1 15 metre (min) buffer to existing woodland (page 60) 15 metre (min) buffer to existing woodland (page 62)</p> <p><u>Wolborough Fen</u> Uncertainty about whether land use proposals will adversely affect SSSI. DFP revised and development in this area significantly reduced or eliminated if this uncertainty cannot be resolved.</p> <p><u>GHB survey data</u> LPA required to have sufficient information to make decision that proposed mitigation can be achieved. Bat survey reports produced in 2014 and 2015. Consider whether this is sound basis.</p>	<p>TDC Drainage Officer and Natural England have reviewed Drainage and Monitoring Strategy</p> <p>Noted. This matter needs to be addressed through the planning application process.</p>
<p>Newton Abbot Town Council</p>	<p>Town Council totally accepts principle of development at NA3 as contained in Plan Teignbridge. It's motivation is to ensure any development of the area is however delivered in responsible way that is not detrimental to the communities of Newton Abbot now, and in future.</p> <p>The Council wishes to raise its concerns regarding :-</p> <p>The timing of delivery of all infrastructure must be commensurate with the pressures the new development will have upon existing service delivery in Newton Abbot, i.e. prior to a large number of new houses being occupied, in particular:-</p> <ul style="list-style-type: none"> - The link road is imperative if any adverse impact upon the town centre is going to be minimalised. A section of Wolborough Street (the A381) already has a recognised serious air quality issue and suffers from congestion. 	<p>The revised masterplan proposes delivery of the through route at the earliest possible stage in order to address concerns surrounding the impact of increased traffic on local roads and accessibility across the allocation</p> <p>The delivery of the through route will divert traffic away from Newton Abbot Town Centre</p>

	<ul style="list-style-type: none"> - Access across the site must be adequate for all users, pedestrians, cyclists, motorists and public transport. If this is not provided there will be a danger that the mistakes made at Hele Park will be repeated (where there were no footpaths provided to facilitate children walking to school) and the residents will become totally isolated from the rest of Newton Abbot; - The key to NA3 working will be convenient access for the public and businesses to and from the A380 South Devon Highway. However, this is facilitated by a traffic light controlled single road bridge over the railway line. It is extremely important that a second bridge over the railway line is provided speeding up traffic movements. Access to the Torquay Road at the Penn Inn is also facilitated by a single lane tunnel at the opposite end of Kingskerswell Road, thus sending traffic in the other direction is also inadequate. <p>Provision of educational facilities; community facilities and a small retail presence must also be delivered in a timely fashion to limit the requirement for residents to travel across Newton Abbot to access daily services. The least the Town Council would expect will be new primary and secondary school provision made, along with the sports and leisure facilities required for these schools, which can also be used by the community out of school hours. Leisure, recreational and play facilities must also be delivered early in the development for the same reasons as outlined above;</p> <p>Ecology/Heritage – it is always going to be unpopular to build on green fields, therefore this development must be delivered sympathetically. In particular the Wolborough Fen needs protection; protection of the South Hams SAC; and rather than there being any threat to Decoy Country Park from this development, a conscious effort should be made to extend it so it may be enjoyed by the expanded population of Newton Abbot.</p>	<p>therefore alleviating pressures from ‘through traffic’ on Wolborough Street and thus improving the air quality in this area.</p> <p>The Movement Strategy includes access for all users. Revised document shows more detail on cycle routes and bus routes</p> <p>The County Council is progressing options for addressing the single track Langford Bridge to increase capacity.</p> <p>Noted. A proposed infrastructure schedule is included with the masterplan.</p> <p>The Ecology and Heritage Strategies of the Masterplan include associated mitigation proposals.</p>
Abbotskerswell Parish Council	Support Council led masterplan Process	

<p>(together with WRA representing 1,800 residents)</p>	<p>1.2 SPD will weaken TDC hand in ensuring its stated objectives are met. Additional time should be given for adopting the DFP as a DPD to help achieve right outcome for all stakeholders and biodiversity interests across the site. Substantial survey undertaken over an extended period in the time taken to produce a DPD would not delay development and final outcome is properly scrutinised by Planning Inspectorate, stakeholders and the public.</p> <p>1.3 Number of constraints and identified risks need to be addressed to provide complete picture. This must be acted upon and not merely “considered”</p> <p>1.4 “ bring forward development based on an alternative developer-led masterplan for the whole allocation”. Concerned that the validity of this masterplan could be superseded and replaced by developer led masterplan.</p> <p>1.6 “DFP informed by technical work “ – should be in public domain.</p> <p>Movement Strategy Concern Main Street is only 6.5 metres as will be a by-pass around town Early delivery of Link Road should be prerequisite. Traffic using coach Road and other lanes around Abbotskerswell is excessive and safety issue. Para 3.10 link road must come before <u>any</u> housing development. Coach Road – weight limit on this country lane No proposals have been considered to cope with the forecast increase in traffic along coach Road, Priory road and Stoneman’s Hill. This is not acceptable; firm proposals must be in place to adequately deal with this issue.</p> <p>Landscape (green infrastructure) Strategy Decoy Brake and Blackball Plantation should come into public ownership. Footpaths reinstated. Area currently used for motorcycle scrambling should be returned.</p> <p>3.34 Management Strategy – who is responsible for drafting it, financing and maintaining it in perpetuity?</p>	<p><u>CHANGE</u> – Development Plan Document preparation is now proposed.</p> <p><u>CHANGE</u> – new para 1.5 “it is also recognised that it may be possible to bring forward development based on an alternative developer-led comprehensive masterplan for the whole allocation, if produced with meaningful and continued engagement from stakeholders</p> <p>The masterplan seeks delivery of the through route at the earliest possible stage in order to address concerns surrounding the impact of increased traffic on local roads and accessibility across the allocation</p> <p><u>CHANGE</u> - Page 15. Para 3.15 regarding local road network</p>
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<p>3.35 There are a number of breeding pairs on the site. Seeking mitigation contribution if current number of breeding pairs cannot be maintained on the site is not enough, this will deprive local residents and visitors of seeing these rare birds in their natural habitat.</p> <p>Greaterhorseshoe Bat Design Framework</p> <p>Teignbridge have prejudged the outcome of the South Hams SAC draft SPD by reducing the flyways from 500m to 50m. 50 metres is not acceptable, proper scientific evidence to support such a reduction in flyways over dark-sky open ground. No scale on plan shown on page 30 showing bat flyways to be able to judge the impact of eight crossing points traversing the link road</p> <p>No evidence in the DFP to support the statement on page 27 ‘extend upon the existing vegetation to enhance and increase wildlife habitat, particularly for greater horseshoe bats’.</p> <p>Highly unlikely that the mitigation measures proposed will achieve the conservation objectives for the South Hams special Area of conservation. They fall below the standard of “<u>beyond reasonable scientific doubt</u>” and therefore put in jeopardy the continued viability of the Special Area of Conservation. Development of the NA3 site should not be considered until there is a thorough re-evaluation of all proposed measures with up to date, comprehensive data.</p> <p>Drainage Strategy</p> <p>Little account taken from reports submitted by Rigare on behalf of Devon wildlife Trust, Royal Haskoning (RH), WRA and APC.</p> <p>Illustrative photos used in DFP are misleading as no large expanses of open green land. On contrary topographically challenging.</p> <p>Comprehensive surveys are essential to make outcome of development on groundwater quality, quantity and reliability better understood to ensure long term viability of the operation of Wolborough Fen as set out in Para 3.43.</p> <p>3.48 No less than 6 people and/or organisations involved in ongoing maintenance of the SUDS. There must be a single individual (person or individual) responsible for the six element who report to the Council at regular intervals. Relying on residents is particularly worrying question whether or such obligation legally enforceable or would be effective.</p> <p>Extract provided from Rigare March 2015 report. Report indicates at 7.17 that site should be assessed for its affinities to a Natura 2000 Code 91 Bog woodland. It granted this would put the site amongst those most highly protected in the UK.</p>	<p>No objection from Natural England regarding the Greater Horseshoe Bat design framework approach.</p> <p><u>CHANGE</u> – Scale shown on every map</p> <p>All background information including the Royal Haskoning and the Rigare Reports were supplied to the multi-disciplinary team at WYG. Also Natural England are fully aware of the documents. TDC Drainage Officer worked together with Natural England and WYG to draw up the Drainage Strategy. Now the document has been revised following representation and further correspondence with Natural England.</p>
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	<p>Also extracts from Royal Haskoning Report</p> <p>The need for a management and maintenance company is referred to in the TDC DFP, but little detail is provided. The TDC DFP does not identify how maintenance of individual property soakaways and surface water drains, including SuDS will be enforced. Past personal experience with enforcement notices indicates that enforcement over a large housing estate will be almost impossible to achieve. This could jeopardise the effectiveness of any mitigation work.</p> <p>The TDC DFP has adopted the minimum monitoring and dataset recommendations described in the RH report. However, adopting minimum requirements will not provide a monitoring strategy that will uphold the high aspirations of that required in the RH report. It must surely be incumbent on TDC to adopt the highest level of protection envisioned in the RH report and include these standards within the Draft Development Framework Plan, so that all can see that the highest standard of evidence is required in order to determine development can proceed within the Wolborough Fen SSSI catchment. Anything less is unacceptable.</p> <p>Heritage Strategy Records from St Mary’s Church going back 1000 years, essential archaeological survey completed.</p> <p>Main Street Design Para 3.66 8% may not be ideal for mobility users. Hard to rationalise para 3.66 with 3.2”development parcels on slopes that are flatter than 1 in 6 metres in gradient”. “Embankment maximum gradient of 50% requiring further earth retaining design is through the Fen catchment” surely not in the Fen itself</p> <p>Utilities – existing utilities infrastructure inadequate. Companies forward capital projects do not contain identifiable plans for extending current network any time soon.</p> <p>Parking – remove permitted development rights from houses</p> <p>HRA – See letter as appendix</p>	<p>Agree challenging topography. Route chosen to minimise steepness of route.</p>
<p>Wolborough Residents Association (together with APC)</p>	<p>Same response as Abbotskerswell Parish Council</p>	

<p>representing 1,800 residents)</p>		
<p>Ogwell Parish Council</p>	<p>Movement Strategy</p> <p>-A381 is already fragile route into the centre of Newton Abbot, prone to congestion at peak times and vulnerable to traffic jams because of the restricted width in Wolborough Street before it joins the A382, making it virtually impossible for HGVs to pass in opposite directions.</p> <p>-Need to take account of increased volume of construction traffic that will inevitably arise prior to the <i>completion</i> of properties for occupation.</p> <p>-LP states “provide vehicular route connecting A380 South Devon Link Road with A381”. The DFP does not reflect this as the eastern link is shown to Kingskerswell Road <i>not</i> the A380. The anticipated junction with the Kingskerswell Road does eventually connect with the A380 but only by turning right via a narrow bridge (over the main railway line) that is of necessity controlled by traffic lights. (Turning left is not an option as it takes traffic along narrow residential roads and underneath the railway line via a single track section.) It is our firm belief that this does not provide adequate access to the NA3 development either when completed or during the years of its construction. Development of this magnitude requires clear access at an early stage to the only dual carriageway in the area, namely the A380, because what is proposed will force the majority of traffic onto the A381, which is not capable of coping with the significant increase in volumes it will generate.</p> <p>-Vast majority of traffic using A381 will travel through centre of Newton Abbot whereas direct access to A380 would have the twin advantages of allowing both NA3 traffic to by-pass it and also relieving some of existing pressure on the town centre road network.</p> <p>-At local level, apprehension that some increase in traffic will attempt to navigate through Ogwell between the A381 and the A383 at Hele using unsuitable country lanes (e.g. Ogwell Road, Croft Road and Chercombe Bridge Road). Some attempt should be made to address this issue.</p>	<p>The delivery of the through route will divert traffic away from Newton Abbot Town Centre therefore alleviating pressures from ‘through traffic’ on Wolborough Street and thus improving the air quality in this area.</p> <p>This will be considered through the planning application – Construction Traffic Management Plan</p> <p>The revised masterplan proposes prompt delivery of the main street through the allocation, which will result in convenient access to the A380.</p> <p><u>CHANGE</u> - Page 15. Para 3.15 regarding local road network</p>

<p>Diocese of Exeter</p>	<p>Heritage Strategy – seek to maximise any possibilities for enhancement of the Church rather than simply seeking to minimise the heritage ‘loss’. Enhance connectivity from and through the new community hub to the Church (so that the design and layout of the hub signals people towards the church and then enables them to access it by foot easily). On the one hand visual framing from the south will be important. However, this needs to be achieved in tandem with, rather than at the expense of, increasing physical accessibility to the church for heritage-related and other community purposes. Pedestrian access across Coach Road and on-site and off-site parking.</p> <p>Design Code - Neighbourhood hub is described as “mixed use pedestrian priority area [...] as part of the area around Wolborough Barton Farm” and consideration should be given to including the church in that mixed use pedestrian priority area. This would mean that the church has benefits from measures to include, ‘good pedestrian and cycle access including safe and convenient crossing points, parking and public transport’.</p> <p>Services and facilities - rationale for location of primary community facilities being in neighbourhood 2 is evident but one consequence is that there will need to be clarity about how residents of other neighbourhoods (particularly 3 and 4) will access them in practical terms. What is true for the neighbourhood hub and the primary school in this regard is also true for the church.</p> <p>Infrastructure Delivery Plan - The trigger points for community facilities need to be brought forward as far as possible and strictly related to the start of any and all development included within NA3, so that there is no chance of early phases of development ‘not counting’ when it comes to calculating whether the relevant thresholds have been reached.</p>	<p>Assessment of Significance report. Details will be included at planning application stage</p> <p>Design Code removed from document.</p> <p>Noted. The revised masterplan promotes early connectivity across the site.</p> <p>The revised infrastructure schedule has been devised to promote prompt community facility provision.</p>
<p>Newton Abbot CIC</p>	<p>Should be DPD to ensure principles are adhered to as much as possible by future developers</p> <p>Vision – Welcome low density housing and green fields retained around Church</p> <p>Framework Plan - Local Plan states 10 hectares employment land should be delivered. Page 15 states “Approx 7 ha of employment land across the site”. This is further confused by the schedule on page 71 which describes a minimum of 3½ ha of employment land.</p> <p>Movement Strategy - Concern over junction of new road on the East side. Although traffic will have opportunity to turn right along Kingskerswell Road to join the new South Devon Highway, any traffic going left</p>	<p><u>CHANGE</u> – Development Plan Document preparation is now proposed</p> <p>Noted.</p> <p><u>CHANGE</u> – Page 13 updated to provide clarity</p> <p>The delivery of the through route will divert traffic away from</p>

	<p>into Newton Abbot will join already congested narrow roads in Decoy, especially when Primary School children going to/coming out school. If traffic goes West to enter Newton Abbot, along Totnes Road, no road improvements in area to improve current congestion. New development will have major impact on amount of traffic entering Newton Abbot from either direction.</p> <p>Design Code – Neighbourhood Hub - Confusion regarding the ‘Neighbourhood Hub’. Page 71, schedule describes “community building” with “D1 or D2 uses totalling approximately 1250m2 within building provided as part of the neighbourhood hub”, built after completion of 300 dwellings. No mention of this, in description of neighbourhood hub pages 54/55 only describes hotel, farm shop, small outdoor square and employment buildings/workshops. No building set aside for local community for a meeting space, use for clubs. Shop also planned on East edge of development. Since this is major development, with no other local facilities, it is considered that a community facility is a major omission. Although there may be possible meeting spaces in the hotel, these will be hired out at commercial rents. No community-led building in development, serious concern.</p>	<p>Newton Abbot Town Centre therefore alleviating pressures from ‘through traffic’ on Wolborough Street and thus improving the air quality in this area.</p> <p>Design Code removed from document. Principles still applied. Use Teignbridge Design Guide is relevant instead.</p>
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Comments from Individuals – grouped into themes

Theme	Summary of comments or issues	Response or proposed change
<p>01 Introduction</p>	<p>Support preparation of a Council led masterplan</p> <p>Why principle already agreed? Further public consultation needed. Infrastructure can’t cope. Reconsider allocation. Evidence for need for more houses. Development needs to reflect the Vision and aspirations of local communities. Seems like a ‘done deal’</p> <p>Should be a Development Plan Document</p> <p>Include plan on page 88 of Local Plan</p>	<p>Noted.</p> <p>The principle of whether or not the development will take place has already been determined through the adoption of the Teignbridge Local Plan.</p> <p><u>CHANGE</u> – Development Plan Document preparation is now proposed</p> <p>There has been considerable more evidence gathered since the Local Plan and the DFP reflects this</p>

	<p>Include reference to Newton Abbot Neighbourhood Plan</p> <p>Building on landfill could be dangerous</p> <p>Retaining ag land. How can that be if building at least 1500 houses</p>	<p>Reference was included on page 5 para 1.7. Included in Revised Masterplan on page 5</p> <p>All relevant organisations have been consulted</p> <p><u>CHANGE</u> -Page 7 last bullet. Expand to make clearer</p>
02 Vision (Part 1)	<p>Concern houses won't be affordable for local people. Need restrictions on who can rent or buy the new houses</p>	<p>Policy requirement of 20% affordable homes. Restricted to addressing local needs via section 106 agreement at planning application stage</p>
03 The Framework (part 2)	<p>Development Framework Well written but why coloured background on page 17 difficult to read. Support idea of 'neighbourhoods' and hope design of housing will reflect the area as hoped. Planning application been received for 3 out of 4 neighbourhoods but page 16 does not indicate which ones</p> <p>Council should insist on wider, visible green break to respect setting of Conservation Area</p> <p>Employment Land 'arms length interest' not a term commonly used by public</p> <p>Concern that too many opt outs for employment land and may never happen. 1300 houses would indicate 2600 job opportunities will be needed. How will this number be found locally? Have the travel to work distances been kept to a minimum in all Teignbridge developments since the Local Plan was approved? Have the appropriate number of jobs been created locally? If so, how many and where?</p> <p>Employment uses to the west is great mistake. Will add to traffic congestion and air quality issues in town centre- Wolborough St</p>	<p><u>CHANGE</u> – colour of page.</p> <p><u>CHANGE</u> – Introduction has been reshaped and this reference has been removed</p> <p>Buffer shown on Local Plan Policies Map</p> <p><u>CHANGE</u> – Removed from Revised Masterplan</p> <p>The masterplan provides for a variety of employment land across the allocation.</p> <p>The revised masterplan recognises the potential for alternative approaches to employment land provision.</p>

	<p>Land adjoining present cemetery is designated for 'light industrial'. This could be residential care home. 'Imagine elderly person living in Care home with daily view from window of town's cemetery!'</p> <p>As Business Manager for Newton Abbot College interested in methodology behind requirements for secondary school as part of plan.</p>	<p>The education authority has identified a need for additional secondary education facilities. We are keen to work with the schools to identify the most appropriate solution for the town</p>
	<p>Movement Strategy</p> <p>Public Transport Future bus route should be marked</p> <p>Langford Bridge Concern re traffic flows arising from the development. Following completion of South Devon link road pressure and delays in and out of Abbotskerswell over railway bridge which is single lane and traffic light controlled and also along Priory Lane Development will cause massive increase in traffic over railway bridge causing big delays. Replace with wider two lane structure or connect straight on South Devon Link Road. Providing direct link to roundabout serving A380 slip road is surely better option Development must provide for second bridge via S106</p> <p>Totnes Road Neighbourhood 1 – access from Neighbourhood 1 onto Totnes road could become a dangerous junction and affect air quality by crawling traffic. The stretch of road from end of Main Street where it joins the existing road near Cemetery, the Ogwell Cross roundabout, to be inadequate for the likely volume of traffic that will be produced. Two accesses onto Totnes Road very close together. Include traffic calming on Totnes Road</p> <p>Coach Road Road safety is an issue on Coach Road. Already dangerous for pedestrians and cyclists.</p>	<p>See response from Devon County Council (Part 2)</p> <p>The County Council is progressing options for addressing the single track Langford Bridge to increase capacity. Langford Bridge is a Community Infrastructure Levy matter, not Section 106.</p> <p>A safety audit will be required which may result in some changes to the speed restrictions on Totnes Road.</p> <p>Road safety is always a careful consideration and constitutes material planning consideration. It is a fact that new development generates additional traffic and will impact on road safety. Once the Main Street is in place and</p>

<p>Coach Road obvious pedestrian/cycle route from new development into town centre, since all other routes are longer and involve steep climbs. Need coherent strategy to reduce traffic and increase pedestrian and cycle use on Coach Road</p> <p>Need improvements if going to use for vehicles as well as cycle/pedestrians</p> <p>Include traffic calming or reduction measures on Coach Road. Currently a rat run. Potential upside of NA3 development for local residents is to make Coach Road a “country lane”</p> <p>New road suggestions Cemetery Cross- Stonemans Hill – Priory Lane – South Devon highway. Series of roundabouts give access and exits to each of four neighbourhoods.</p> <p>Totnes Road – Bradley Lane via Bradley Park – adjacent to Steppes Meadow. Move lower football pitch and Bradley Lane will get upgraded service road</p> <p>More direct route between A380 and A381 as shown in Local Plan</p> <p>Need second bridge crossing over the railway line onto A380</p> <p>Move route away from Grade 1 Listed St Mary’s Church. A route that joins at Stonemans Hill (where footpath currently comes out)</p> <p>Remove speed bumps on Kingskerswell Road</p> <p>Construction traffic Build the Infrastructure / Main Street ahead of development</p> <p>Main Street will only be completed when Neighbourhoods 2,3 and 4 are completed. Considerable amount of time when construction traffic and half of allocated houses traffic will be accessing site from Totnes road side</p>	<p>the resultant use of coach road is better understood provisions can be explored to ensure it is safe and suitable for the intended use.</p> <p>The alignment indicated in the DFP for the main street has been carefully considered in terms of its primary function as a route to serve the development, but also divert traffic accessing the A380 from the A381 (or vice versa) from travelling through the centre of Newton Abbot. In order to achieve the latter, the route will need to be designed in a way that ensures it is a desirable alternative but that does not compromise connectivity throughout the development. The route proposed through the revised masterplan is designed in such a way that does not have a significant adverse impact on the landscape or a negative impact on heritage assets. Speed bumps on KK Road installed for safety reasons. No plans to remove them.</p> <p>The DFP seeks delivery of the through route at the earliest possible stage in order to address concerns surrounding the impact of increased traffic on local roads and accessibility across the allocation</p>
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	<p>Construction traffic will use Bradley Road to access Coach Road</p> <p>Should set up a compulsory route for construction traffic via roundabout at Ogwell so vehicles aren't tempted to use the most direct route</p> <p>The proposals ignore the impact the development will have on Wolborough Street which already suffers severely from traffic problems and excessive carbon emissions</p> <p>Already congestion issues going into Newton Abbot Town Centre from Ogwell Cross roundabout, this will be serverly increased by additional traffic flow. Concern re traffic flows under railway bridge by Sainsburys</p> <p>Effectiveness of this road is limited because there is no means of providing a further connection on to A382 at Hele (thus linking the South Devon Link Road, the Totnes road, the Ashburton Road and Bovey Road at Forches Cross</p> <p>Parking Where will additional vehicles park when residents shop in Newton Abbot Town Centre? Much easier for NA3 residents to use willows where parking is free. The Vision for Newton Abbot will therefore not be achieved.</p>	<p>This will be considered through the planning application – Construction Traffic Management Plan</p> <p>The delivery of the through route will divert traffic away from Newton Abbot Town Centre therefore alleviating pressures from 'through traffic' on Wolborough Street and thus improving the air quality in this area.</p> <p><u>CHANGE</u> - Para 3.15 of Revised masterplan includes reference to addressing local road network where necessary</p> <p>Not relevant to this masterplan. Can be considered as part of Local Plan Review but connection considered unlikely to be feasible.</p> <p>Not part of this Masterplan. Town Centre regeneration developments will take account for adequate levels of parking.</p>
	<p>Density Strategy Too many houses, using up lot of green space The reduction of the total number of houses is welcomed and a reflection of the complexities of the site. As the complexities of the site become more apparent should reduce the number further to meet obligations for the area as set out in Local Plan e.g. respecting church, no impact on SSSI etc</p>	<p>The adopted Local Plan Policy NA3 criteria c) requirement is to deliver at least 1,500 homes. The revised masterplan reflects this.</p>
	<p>Landuse Strategy MUGA detached from primary school. So lessons will be curtailed by necessary walk from the school to MUGA and back again. Also, on fairly high ground should be on more level ground.</p>	<p>The primary school site is of a sufficient size that the facilities required can be accommodated on-site. It is therefore not reliant on off-site infrastructure. I assume the MUGA is intended to be a community facility.</p>

	<p>If MUGA goes ahead on high ground, flood lighting may be needed and cause great disruption to Greater Horseshoe Bat population.</p>	
	<p>Landscape (GI) Strategy Villages of Abbotskerswell and Kingskerswell will become part of Newton Abbot</p> <p>Need to include more references that the boundary with Abbotskerswell will be respected to ensure that the village retains its identity How much 'new habitat will be created and enhanced in area/hectares? Will it just be a 2m strip either side of existing hedgerows or something more substantial like a 1 hectare field?</p> <p>Strongly agree with creating high quality amenity spaces as the existing Decoy Country Play Area get extremely busy. Need to be clearer on type of play space including both wet play and areas of play equipment for diverse age groups, toilets, possibly a café and parking. Only this will ensure a sufficient draw away from Decoy Country Park.</p> <p>All housing on edge of development should have integrated bat and bird boxes and where possible solar panels. Rainwater collected from gardens and flushing loos Concern no land reserved for cemetery extension</p>	<p>Map on page 24 of Consultation Draft and page 20 of the Revised Draft shows ecological buffer and land retained in agricultural use which will be a buffer to development.</p> <p>Detail on open space is included in the Infrastructure Schedule. See also para 3.43</p>
	<p>Greater Horseshoe Bat Design Framework Flyways Para 3.40 Strategic flyways have been reduced from 500 metres to 50 metres. Has 50 metres been scientifically proven to be sustainable? Bat corridor should be at least 50 metres and secondary corridors at least 20 metres wide</p> <p>Lighting Maintained at a sufficiently low level? Restrictions on lighting that housing, industrial units etc can install in the future to maintain the bat corridor</p> <p>Plans / studies / evidence</p>	<p>Indicative Greater Horseshoe Bat framework supported by Natural England</p> <p>The impact of development at NA3 Wolborough on GHB has been considered and will be considered further. As outlined on page 25.</p>

	<p>If mitigation not deliverable elected Members must refuse the grant planning permission</p> <p>Exclude development in any areas near or adjacent to flyways</p> <p>University of Exeter identified that link road will have significant effect on GHBs</p> <p>Plans/studies should be part of this consultation. Should exclude all development until these documents are available for elected members and the public</p> <p>No evidence has been produced to indicate that mitigation strategies for GHBs are effective (this would include new mitigated areas, bridges, underpasses etc)</p>	
	<p>Drainage Strategy</p> <p>How will developers ensure methods they use are sustainable in long term? May silt up in future? How maintained?</p> <p>In extreme rainfall will Decoy lake rise? How will this be mitigated?</p> <p>Loss of land to act as a sponge when have intense and long period of rain.</p> <p>Is there sufficient sewage capacity?</p> <p>The Royal Haskoning report raised serious concerns around the movement or interference of the Fen</p> <p>Page 33 clauses 3.1 – 3.48 The acceptable standard for the maintenance of the Wolborough Fen SSSI should be ‘beyond all reasonable scientific doubt’. Drilling in the Fen catchment area will be detrimental. Drill holes often become aquifers</p> <p>Clause 3.48 suggests a number of different people/organisations will be responsible for various aspects of the SUDS maintenance. Should be one person taking responsibility that all six elements are properly undertaken at appropriate intervals and reports presented to Full Council.</p> <p>Considerable more work and investigation is necessary to cover, inter alia, the flood water and drainage problems. The results of any further tests must be made public and subject to professional scrutiny.</p>	<p>The impact of the SUDs on local drainage has been considered. The ongoing maintenance of then will be the responsibility of an appropriate body. Many solutions are low maintenance.</p> <p>A revised drainage strategy has been prepared in dialogue with Natural England and proposes a framework for further more detailed work through the planning application process.</p>
	<p>Heritage Strategy</p> <p>Houses at 1, 2, 3 and 3A Coach Road are in Conservation Area and will be directly affected by development of Neighbourhood 2</p> <p>Enhance St Mary’s Church for the use of growing community. This may involve the layout of the community hub at Wolborough Barton Farm being sympathetic in its</p>	<p>Further work has been carried out – Statement of significance and Settings Assessment for St Mary’s Church, Wolborough, Newton Abbot</p> <p>Work prepared in conjunction with Historic England.</p>

	<p>relationship with church, including design language, car parking, signposting for all types of users and importantly easy crossing of Coach Road for pedestrians. (11)</p> <p>DFP concludes “moderate harm to the significance of “ Grade 1 Listed Church of St Mary . Historic England says development has ‘substantial harm’.</p> <p>Hotel not appropriate in this location. Should have small rooms for community use e.g scouts, guides, WI, exercise or craft groups. Small cinema. small restaurant</p> <p>Welcomes that the DFP demonstrates greater sensitivity and respects setting of St Mary’s and Conservation Area than previous planning applications. If DFP combined with truly sympathetic designs of buildings constructed in the ‘Neighbourhood Hub’, that would help make the proposed development much more acceptable.</p> <p>Location of Primary School very overlooked by Church and will impact on rural setting. Green spaces that the school needs e.g. playing fields/forest school should be closer to Church than other buildings.</p>	<p><u>CHANGE</u> – Following work carried out on the emerging assessment of significance, changes made to Heritage Strategy in revised Masterplan document</p>
	<p>Main Street Design</p> <p>Support ‘main street’ as it will go some way to avoid adding to inevitable further traffic chaos, in and around Newton Abbot</p> <p>The early delivery of the Main Street is not just essential but should be a pre-requisite for any development.</p> <p>Will suffer from gridlock, aggravation and excessive carbon emissions. Part of it is running through valley with houses on each side. In short it will be another Wolborough Street</p> <p>Noise pollution – Main Street will cause significant noise nuisance for people living on slopes of Wolborough Conservation Area. The prevailing south westerly winds and the topography of the area mean this a natural amphitheatre, amplifying any sounds.</p>	<p>The intention of the Main Street is to serve as both a development road to access the various parcels of development, but also divert through traffic away from the town centre.</p> <p>Landscaping and positioning of buildings will need to be considered to mitigate any noise impact. The road is intended to be speed limited so is not anticipated to cause significant noise pollution.</p> <p>The design of the through route will need to consider and include appropriate measures to reduce the impact upon air quality. Planning application for development will need</p>

	<p>Main Street and its junctions will need to be designed to take considerable traffic flow and parking restriction along its whole length is necessary</p> <p>Main Street serves houses on both sides and will lead to major ‘cut and fill’ operations which will devastate the existing topography and produce housing layout which is overbearing and massively unattractive when viewed from Wolborough Conservation Area and St Mary’s church</p> <p>Concern Main street carriageway is to be only 6.5m width</p> <p>Concern Main Street will be a rat run between Torquay and Newton Abbot</p> <p>Conflicting description of key transport corridor and generous tree lined residential street</p> <p>Planned footpath and cyclepaths are commendable</p>	<p>to demonstrate that the relevant junctions and local highway network will operate within capacity through a full transport assessment and traffic modelling.</p> <p>It is acknowledges that the construction of the road will require a certain amount of ‘cut and fill’ to ensure appropriate gradients and safe access can be achieved. However, the road will be designed in such a way that does not have significant adverse impact upon the landscape or on the listed building.</p>
<p>04 Design Code (part 3)</p>	<p>Neighbourhood hub</p> <ul style="list-style-type: none"> - Set trigger for community space lower so delivered in timely fashion. - Should provide for whole of Newton Abbot not just this development. - Provide for youth – more recreational facilities, ability to learn new skills. - Need space for inhabitants to meet. Utilised by all ages, clubs and creative centres. - Newton Abbot Leisure Centre small swimming pool for growing community. - Support if provides things people need, shop, Post Office, restaurant, chemist - Hub next to Coach Road is distance from other Neighbourhoods which has implications for useage and financial viability of some facilities. Vehicular access from Neighbourhhod 1 to Stonemans Hill will probably help residents of that Neighbourhood to access the hub. - Part 4 includes reference to community building but not included on page 54-55 – cast doubt on how serious you are. 	<p>Design Code (Part 3) removed from document.</p> <p>However, still requirement Local Plan Policy NA3 criteria (d) to provide social and community infrastructure including youth centre, local shops, community facilities and a site of 5 hectares for a 420 place primary school including early years provision and secondary school or other further education facility.</p> <p>Emerging Teignbridge Design Guide and Policy S2 in Local Plan</p>
	<p>Neighbourhoods</p> <p>Neighbourhood 1</p> <p>Newton Abbot 66 pleased to see inclusion of formal playing fields. Ideal opportunity to work in partnership with the council to develop this aspect at early stage.</p>	<p>Design Code (Part 3) removed from document.</p> <p>However, still requirement Local Plan Policy NA3 criteria (d) to provide social and community infrastructure</p>

	<p>Concern regarding two access points off Totnes Road and Priory Lane (assume Priory Lane mistake and mean Cemetery Road from Abotskerswell?)</p> <p>Neighbourhood 2 In Neighbourhood 2 at least half the allocated land is not only steep but also undulating in its topography, a unique and special characteristics of the area Page 88 of Local Plan (map) shows majority of land with Neighbourhood 2 as 'Other green infrastructure'. DFP shows areas of residential. Why has this changed when landscape officer and historic England against this?</p> <p>Parking Minimum of 2 parking spaces per house as garages never used for cars and on street parking causes resentment.</p>	<p>including youth centre, local shops, community facilities and a site of 5 hectares for a 420 place primary school including early years provision and secondary school or other further education facility.</p> <p>Emerging Teignbridge Design Guide and Policy S2 in Local Plan</p>
The Way Forward (part 4)	<p>Extremely important that Main Street is completed before substantial number of houses – say 200 – are constructed in Neighbourhoods 1 and 2. Ideally the whole development would start with Neighbourhood 4 and work westwards</p> <p>Include reference to Neighbourhood Facility in Neighbourhood 4. If facility is not a 'shell' building for community use/ shop what will it be?</p> <p>Need for employment land is supported. Reduced to 7 hectares on page 15,17 &25 to just 3.5 hectares on page 71. "Any shortfall to be delivered elsewhere" but no indication of where. TDC not serious about providing good employment opportunities.</p>	<p><u>CHANGE</u> – see Infrastructure Delivery Schedule</p>
SEA	<p>High standards of biodiversity and other environmental standards must be maintained.</p>	<p>SEA not needed for guidance document. But requirements still fulfilled.</p>
HRA	<p>Very comprehensive document. Further survey effort needed for each neighbourhood area, which is good, still need take overall picture of bat and wildlife use for whole site.</p>	<p>HRA not needed for guidance document. But requirements still fulfilled.</p>