

Spatial Planning
Teignbridge District Council Offices
Forde House
Brunel Road
Newton Abbot
TQ12 4XX

20 December 2023

Dear Sir or Madam

Consultation on Proposed Submission (Regulation 19) Local Plan 2020-2040 Addendum (Nov 2023), Policies Map, Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulation Assessment, 8 November – 22 December 2023

Please find our comments below on the changes in the above documents. This is the joint response of Holcombe Residents Association, Oakland Park Residents Association and Friends of Oaklands Wood, Dawlish Facebook Group. At the time of writing, Holcombe Residents Association has around 400 members, Oakland Park Residents Association represents 148 households with a population of about 300 and Friends of Oaklands Wood, Dawlish Facebook Group has 175 members. We trust these comments will be taken into account by Teignbridge District Council and that it will recommend modifications of the Local Plan to the Inspector accordingly.

Proposed Submission (Regulation 19) Local Plan 2020-2040 Addendum (Nov 2023)

Change:

1.13 In some circumstances it may be necessary and reasonable for land outside the settlement limit, including land identified in Policy GC2, to facilitate development, for example by accommodating drainage and 'SUDS' requirements, active travel routes, other necessary infrastructure works, publicly accessible open space, and wildlife areas.

Comments:

We consider that the 'circumstances' should be clarified: We are concerned that the provision of supporting infrastructure, public open space and/or wildlife areas that are necessary to deliver development, beyond settlement limits within the open countryside has the potential to harm the character of the countryside and the rural/coastal setting of settlements in the district. This could have a detrimental impact on the tourist appeal of some settlements. It encourages a 'hard edge' to settlements instead of a gradual change from urban to rural through the use of such

infrastructure mixed with development. It effectively extends the settlement limits into the countryside. This should not happen where there is a risk of coalescence between settlements.

Change:

GP6A: Open Space and Recreation Facilities

The redevelopment of open space, play, sport and recreational land and buildings (including playing fields) for another use will not be permitted unless one or more of the following relevant criteria apply:

- a. It can be demonstrated that the use is no longer necessary and there will continue to be sufficient, equivalent provision within the local area; or
- b. The existing use is causing a significant problem which can only be resolved with relocation, or the proposal is for alternative sports and recreational provision. Where replacement facilities are proposed, they must outweigh the loss of the existing provision and must be of equivalent or better provision in terms of quantity and quality in a suitable location, wherever possible within 10 minutes walking distance of the community it served.

The redevelopment of Local Green Spaces, Public Rights of Way, Connecting to Nature sites or other Green Infrastructure designated in the Local Plan or Neighbourhood Plans (as shown on the Policies Map) will not be permitted unless the existing use is causing a significant problem which can only be resolved with relocation, and which outweighs the loss of that type of provision. Where a proposal affects an area designated as Local Green Space, the designating community must be in agreement with the proposed change.

Comments:

The definition of 'open space' should be clarified. The NPPF definition is 'All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.' We consider that the three fields adjoining Oaklands Wood, Dawlish meet this definition. The fields have footpath connections to the wood and a Public Right of Way running along the edge of the wood to the north.

We question use of the word 'redevelopment' in the second paragraph, as it suggests these areas are previously developed, whereas in the majority of cases they won't be, therefore 'development' would be a more appropriate word to use.

As discussed in more detail below, we consider that Oaklands Wood and the three fields it adjoins with to the south should be designated as a Local Green Space in the Local Plan. Please find enclosed a petition with 1,291 signatures supporting this. (NB. The petition comprises an online version with 1,228 signatures and a paper version with 63 signatures. An accompanying plan showing the area we consider should be designated a Local Green Space outlined in red, is also enclosed.)

Change:

5.3 The supply of housing land is comprised as follows:

	<u>5% Buffer</u>
<u>A. Housing land requirement over 16 years (2023/24 – 2038/39) including 5% buffer for first 5 years</u>	<u>11,664</u>
<u>B. Baseline supply available over 16 years (2023/24 – 2038/39) (B1+B2+B3):</u>	<u>13,017</u>
<u>B1: Existing commitments</u>	<u>6,732</u>
<u>B2: New allocations</u>	<u>4,125</u>
<u>B3: Windfall allowance</u>	<u>2,160</u>
<u>C. Dartmoor Allowance</u>	<u>288</u>
<u>D. Total supply (B + C)</u>	<u>13,305</u>
<u>E. Headroom/Flexibility on 16-year requirement (D – A)</u>	<u>1,641</u>
<u>F. Total number of years' supply (D/(A/16))</u>	<u>18.25</u>

Table 6. Housing land supply calculation

Comments:

Based on the table above, we do not consider that any further greenfield sites should be allocated for housing development in the Local Plan. This includes the three fields adjoining Oaklands Wood, Dawlish, which we consider should be designated as a Local Green Space through the Local Plan. It should be noted that the existing commitments above include 763 dwellings in Dawlish and 315 in Teignmouth (see Housing Topic Paper).

Change:

H5: Homes Suitable for All

To achieve a range of housing sizes and specifications that meet a wider range of needs, all new residential developments of 10 dwellings or more will:

- Be constructed with the following requirements for accessible homes or successive regulations, unless the applicant can demonstrate there are site specific reasons why this is not feasible:*
 - 30% M4(2) (Accessible and adaptable dwellings) or the latest Building Regulations requirements if higher.*
 - On schemes of more than 20 homes, 5% M4(3) (Wheelchair user dwellings)*
- Specific provision for extra care housing, supported housing, adapted housing for older people and people with special needs, including retirement housing,*

retirement communities and care homes will be supported in principle within or closely related to settlement limits;

3. *As a minimum meet the nationally described space standards with regard to gross internal floor areas and storage. Exceptions to this will only be acceptable where the housing product has been specifically custom designed as a “compact home”.*
4. *Meet the needs of household types in the locality by providing a house size mix to reflect the demand from smaller households; and*
5. *Support in principle will be given on sites within settlement limits and on allocated or Exception Sites (H7 and H8) for:*
 - a. *Shared housing, including co-housing;*
 - b. *Innovative and sustainable methods of construction such as modular homes; and*
 - c. *Custom built ‘compact homes’.*

Comments:

Criterion 2 does not make sense in relation to the first sentence of the policy, i.e. “*all new residential developments of 10 dwellings or more will: ... Specific provision for extra care housing, supported housing, adapted housing for older people and people with special needs, including retirement housing, retirement communities and care homes will be supported in principle within or closely related to settlement limits;*” It is considered that this would read better as a separate paragraph. It would also help to explain what each type of housing is in the supporting text or a glossary.

Change:

EN2: Undeveloped Coast

1. *The protection, maintenance and enhancement of the distinctive landscape, seascape and historic character of the Undeveloped Coast, and ecosystem services and networks of habitats provided by it, will be given significant weight.*
2. *New development will be regarded as inappropriate except where it is consistent with the Shoreline Management Plan and/or Marine Plan, can demonstrate that it cannot be located outside the Undeveloped Coast and satisfies one of the following*
 - a. *Is householder development in line with H11;*
 - b. *Is the replacement of an existing dwelling in line with H13 or replacement development or infrastructure complying with EN3;*
 - c. *Is the development of “exception” housing in line with Policies H7 (Rural Exception Sites) and H8 (Other Exception Sites) or is the provision of specialist housing in line with H5 (Homes Suitable for All)*
 - ~~ed.~~ *Is required for the purposes of agriculture or forestry;*
 - ~~de.~~ *Is minor development, required for the ongoing viable operation of an existing business or tourism use;*

- ef. Is redevelopment of an existing business or tourism use, where enhancement of the character of the undeveloped coast will be provided;*
- fg. Is an essential community facility required by a coastal settlement;*
- gh. Helps to deliver the Local Nature Recovery Strategy; or*
- hi. Is required for flood alleviation or coastal resilience.*

3. *Development within the Undeveloped Coast will:*

- a. conserve and enhance the key landscape, seascape, and historic character of the undeveloped coast, including the significance of heritage assets within their coastal settings; and*
- b. Conserve and enhance the estuaries and coast as important wildlife habitats and corridors; and*
- c. Where appropriate and feasible, development will take opportunities to improve public access to, and enjoyment of, the coast, subject to criteria a and b above.*

4. *Development outside the Undeveloped Coast, but which could impact on the Undeveloped Coast will be assessed with regard to criteria 3 (a)-(c) above.*

Comments:

We strongly **object** to the new text added under 2.c.: The development of “exception” housing in line with Policies H7 and H8 or specialist housing in line with Policy H5, such as retirement housing, retirement communities and care homes, within the Undeveloped Coast would significantly harm its character. This conflicts with the whole point of the policy of protecting the Undeveloped Coast. As set out in paragraph 6.4, *“The open stretches of Undeveloped Coast have their own special character and, where possible, **should remain open and undeveloped.**”* Therefore, the new text added under 2.c. should be deleted.

Schedule 2: Proposed Changes to the Policies Map accompanying the Proposed Submission Local Plan 2020-2040

We **support** the correction of the Settlement Limit to the south of Dawlish, so that it runs along the south of development in South Downs Road and Bunting Way in accordance with the Adopted Local Plan 2013-2033. The Settlement Limit should not change in order to:

- maintain the strategic break between Dawlish and Holcombe to prevent their coalescence and preserve their separate identities (in line with Policy EN1);
- protect the landscape character of the Undeveloped Coast (in line with Policy EN2);
- protect the grade 2 agricultural land to the south for food production;
- protect the adjoining fields and Public Right of Way for their recreational value, tranquillity and value to the local community; and
- protect the adjoining area for its wildlife benefits, including curlew bunting territories.

It should be noted that the Inspector who examined the Teignbridge Local Plan 2033 considered that Site Allocation DA4 (the new housing development at Bunting Way) should **not** be extended, as it would “*undoubtedly increase the sense of coalescence*” between Holcombe and Dawlish. A hedgebank was planted along the southern boundary of this development and time should be given for it to become established, to provide a buffer between the fields and new housing, as intended. The Landscape Sensitivity Assessment (Burton Reid Associates, January 2023) for the fields confirmed they have High Landscape value, High Landscape susceptibility and High Visual susceptibility. The area is visible from the South West Coast Path and the Public Right of Way running adjacent to the Settlement Limit forms part of wider walking routes, such as the Dawlish and Teignmouth Circular ([Dawlish and Teignmouth Circular: 93 Reviews, Map - Devon, England | AllTrails](#)) and the Teignmouth and Dawlish Way ([Teignmouth and Dawlish Way - LDWA Long Distance Paths](#)). There are far-reaching views of the surrounding landscape and sea from the Public Right of Way and informal footpaths around the fields. Therefore, maintaining the Settlement Limit in accordance with the Adopted Local Plan 2013-2033 is important to protect the adjoining land as accessible green space for the local community, with its associated health benefits, and to protect the character of the town and its tourism appeal due to its coastal landscape setting.

Sustainability Appraisal/Strategic Environmental Assessment

In regard to Appendix C: Additional Alternatives Information (2nd November 2023) and specifically Site ‘Land west of Teignmouth Road 6k137ap’ in Tables C.3 and C.8, while we strongly **support** rejecting this site as a site allocation, we consider that the reasons given in the tables, copied below, are not comprehensive enough.

The site encompasses land between Dawlish and Holcombe. Northern 3 fields much less steeply sloping than those of the valley to north and south of watercourse. Vehicular access via A379 to east would need to rise to reach developable land. Possibility of smaller areas for custom build/small site off spurs of development via South Downs Road. Opportunity to provide biodiversity net gain and SANGS through the creation of a valley park and development that includes good quality GI throughout. Whilst it will reduce the undeveloped gap between Dawlish and Holcombe, the site lies adjacent, in part, to existing residential estate development, which assists in providing a suitable context for the development of the northern part of the site. Potential for development in the northern part of the site but the undeveloped gap between Dawlish and Holcombe is already very narrow and further development would reduce this to around 200m. In this sensitive coastal area this is considered to outweigh the benefit of development.

The site encompasses land between Dawlish and Holcombe. Vehicular access can be achieved via Teignmouth Road (A379) to the east but would need to rise to reach developable land. Would need to provide biodiversity net gain and SANGS through the creation of a valley park and development that includes good quality green infrastructure throughout. Development would reduce the undeveloped gap between Dawlish and Holcombe which forms part of the landscape character of the area.

The revised site for Addendum Plan consideration was reduced into three gently sloping fields. A landscape buffer would be recommended along the edge of the mature woodland and adjacent to the existing adjacent residential properties. The upper fields are visually exposed to views from the northern edge of Holcombe. It is considered that Land West of Teignmouth Road would be undesirable to be developed due to its location within the Undeveloped Coast and impact on open break between Dawlish and Holcombe.

Our comments made in relation to Schedule 2 above should be referred to and added accordingly. The site connects with Oaklands Wood and local people use them for dog walking and other recreational activity. In our opinion, they already function as a SANG, with beautiful, far-reaching views and readily available, free parking on John Nash Drive. Development on the site would negate this and a SANG in the narrow valley adjacent to Holcombe would not compensate for its loss. It would be far less accessible due to its steep topography and lack the views the fields provide which make them so attractive to walkers. Furthermore, the revised site for Addendum Plan consideration referred to in Table C.8 was still reliant on the valley to deliver access and supporting infrastructure, so in effect would have resulted in the coalescence of the two settlements, with no intervening countryside.

Another reason is the footway along Teignmouth Hill to the north leading to the town centre becomes extremely narrow and vehicles using the A379 pass extremely close to pedestrians. We consider this is an unsafe walking route with seemingly no prospect of it being widened, due to the close proximity of the cliff.

Lastly, we consider another reason for not allocating this site for housing is that it should be designated as a Local Green Space instead, together with Oaklands Wood. This is due to their natural beauty and tranquillity, and recreational and ecological value. The wood is a remnant of the landscaped Oaklands Estate with local heritage value, although plant species suggest there has been woodland there for many centuries. People have used the wood and fields for walking and other recreational activity for many years. They are highly valued by the local community in both Dawlish and Holcombe. This is evidenced by the Gruffalo characters that have been placed around the wood. The enclosed petition signed by a total of 1,291 people (996 from postcodes EX7 and TQ14) provides further clear evidence. This requests that the wood and fields, as shown outlined in red on the accompanying plan, are allocated as a Local Green Space in the Local Plan. With reference to paragraph 106 of the NPPF (2023), the space is in close proximity to the community it serves, demonstrably special to the local community (see above) and local in character, not an extensive tract of land. Designation as a Local Green Space is therefore entirely appropriate in planning terms and would not undermine the delivery of housing or other sustainable development in the district. This takes into account the amount of housing already delivered in Dawlish and Teignmouth over recent years. It would be consistent with Policies EN1 and EN2, but offer additional protection from development, as befitting the value of these green spaces to the local community.

We would be grateful if Teignbridge District Council could acknowledge receipt of this letter and the enclosed petition. We would also be grateful if we could be

informed of any further developments concerning Site 'Land west of Teignmouth Road 6k137ap' and we are treated as a non-statutory consultee.

Yours faithfully

Andy Watson
Secretary, Holcombe Residents Association

Deborah Wallis
Secretary, Oakland Park Residents Association

Matthew Diamond MRTPI BA (Hons) MA
Admin, Friends of Oaklands Wood, Dawlish Facebook Group

Enc.