

Hatherleigh Town Council response to Plymouth and South West Devon Joint Local Plan, 'Smaller towns and key villages' April 2017

5. Please give details of why you consider the Local Plan is not legally compliant, unsound or fails to comply with the duty to co-operate.

We believe the plan does not meet the *Soundness* criteria for the town of HATHERLEIGH for reasons set out below:

1. It does not 'meet development and infrastructure requirements' because...

a) There will be insufficient primary school places in the town of Hatherleigh to accommodate further large developments beyond September 2017.

The current capacity is at 178 (March 2017) and is expected to rise to 188 pupils in September 2017. That equates to class sizes of between 22 and 30 in each of the 7 classes (one for every year group).

The primary school have no additional classrooms and some rooms are relatively small meaning there is extremely limited capacity to cope once the number of children rises beyond an additional 10 after September 2017, as stated by the headteacher, Caroline Boother.

According to Devon County Council calculations in *Education Section 106 Infrastructure Approach document 2013* they establish that, "on average, each family dwelling (i.e. dwellings with 2 bedrooms or more) generates approximately 0.25 primary aged pupils (ages 5 to 11)".

We can therefore assume that 150 dwellings will generate 37.5 children. If Hatherleigh were to increase in size by 200 homes in the next decade, this could equate to a pupil yield of approx 50 extra children.

**Please note that we dispute this calculation as being too inaccurate in the same way that similar calculations base requirements for car park spaces for dwelling units at 1.5 space for each unit. It is an undisputed fact that car park allocation is usually inadequate on account that most families now own at least 2 cars!

If the schools intake was 10 pupils per year in line with this years' expectation, then the projected increase would be 170 pupils by the year 2034. Almost double what it is now.

Taking account of the statement above by the head teacher, even if there were an expansion to the building at this current site, it would not be sufficient to double in size and accommodate 7 additional classrooms.

If you visit the current site you can see that any expansion would be limited unless the schools playing field came into the equation. However building on school playing fields goes against Govt standards for school premises and the need to provide outdoor space for physical education.

Perhaps the option of building a new school has been considered? This would be a huge undertaking and one that appears highly unlikely considering reductions in the education budget (and [s106 money would not stretch to fund a new school](#)) . Also the case study of the proposed build of a new school in Okehampton shows that any proposal for the building of a new school in Hatherleigh would not come forth for a substantial amount of time, ie not within the lifetime of this Plan.

If Hatherleigh cannot accommodate its own primary school pupils it can no longer be termed a Sustainable Settlement and goes against the general sentiment and vision of the Joint Local Plan of development being 'appropriate and proportionate' and its policies:

SPT1: services that meet needs of local people

SPT2: 9. Have appropriate level of services to meet identified needs

Measures of Sustainable Communities (figure 3.2) walking distances to nearest primary school

SO6: 5. Promoting schools facilities to reinforce strong communities; 6. Reducing the need to travel

SO8: 1. Provision of small towns to play their role as local service centres for their surrounding areas.

The suggestion that children from Hatherleigh could be bussed elsewhere shows a highly contradictory approach as it goes against the vision of what a sustainable community should be and it goes against National Govt Policy on its projections for increasing the percentage of children who walk to school.

Dept of Transport, Cycling and Walking investment Strategy, pg 6. *“Our long term goal up to 2040 is that walking and cycling should be a normal part of everyday life, and the natural choice for shorter journeys such as the commute to school, college, work or leisure trips.”*

b) employment land allocation - direction of expansion site possibly unfeasible

Questions are raised on how TTV29 12 can deliver the employment space stated. The section of this allocation (previously named WD_06_02_8/13) closest to the industrial estate does not line up with any road continuation of the industrial estate. Any access through would have to be through the neighbouring field, can this be guaranteed? This field is also not in the new settlement boundary.

If this route is unavailable, where does this leave the employment allocation and the proviso of a mixed use development? How suitable is the other access point from the A3072?

We fail to see how there is sufficient space between the current property dwellings for a substantial road junction at Hannaborough Lane entrance required for an employment space of 8000 sqm.

We also fail to see how sufficient consideration has been taken of ‘development and infrastructure requirements’ considering the fact that:

1. Hannaborough Lane is a single track road

2. The single track lane serves 6 properties which include:

a) a nursing home of 48 residents with associated care staff (employs a total of 89 members of staff - nurses, cleaners, kitchen staff, activities), and 15 privately rented flats.

b) two working farms with associated large vehicle traffic.

The junction of Hannaborough Lane where it meets the A3072 is excessively busy as its location serves the entrance to the nursing home. There is also insufficient parking to cope with the number of visitors to the home which forces cars to park on the road in the immediate vicinity causing at times access problems for other residents on Hannaborough Lane.

It also needs uninterrupted access for ambulance emergency services.

This therefore has implications on the feasibility of TTV29 12 for allocating 8,000 sqm of employment space.

Without this employment space is there sufficient employment opportunities or justification to accommodate the influx of another large housing estate? **Creating homes without supporting employment allocation further exacerbates a commuter culture and again goes against the general sentiment and vision of the Joint Local Plan for creating Sustainable Settlements.**

C) The Linear nature of the new development boundary.

The extension to the settlement boundary projects beyond a natural development line thereby increasing the need for new inhabitants to drive into our small town centre with already overcrowding of street car parking spaces. This linear positioning also conflicts with DEV10 and the need to avoid *“developments that appear to be an unrelated addition to the rest of the town”*.

2. Is not justified because...

We are considered as a Local Centre, a town which already serves to provide facilities and services for satellite villages. How much consideration has been factored in for the expanding populations of these villages and the extra resources that will be needed for them in Hatherleigh.

We appreciate this is a strategic document, however there has to be some understanding of the specific implications for small towns such as ours when allocating figures for housing growth.

We have repeatedly responded through consultations on the fact that Hatherleigh has seen an increase in growth over and above what is expected. In WDBC topic paper *Understanding Our Objectively Assessed Need and Future Housing Targets*, pg 16: 3.17, it states “*The three towns which experienced the highest rates of growth [Okehampton, Tavistock and Hatherleigh] have seen significant levels of growth proportionate to their size and the infrastructure of the towns is now struggling in order to accommodate the population increase arising from these developments.*”

In the same document pg 17: 3.18 there is discussion on how ‘*the over delivery of homes can artificially inflate population growth*’ and ‘*artificially reflect a housing need [thereby] creating a higher demand*’. “*it is probable that an artificial reflection of housing need has been built in to the demographic trend-based scenarios showing that future projections of population growth may be overestimated as a result of previous overdelivery in the Borough*”. We consider this is how an excessive allocation has been afforded to Hatherleigh and an increase which we contest.

West Devon Borough Councils Sustainability Appraisal (Feb 2015) also recognises Hatherleigh’s high level of growth in comparison to other small towns. It also states ‘*if expansion of the town is not managed sensitively and phased over an appropriate period of time then it could have negative effects*’. We consider that allowing two substantial developments within the short to medium term (ie the next decade) is not a sustainable time frame and would produce negative effects not only for Hatherleigh but also for Okehampton and elsewhere due to extra traffic generated in employment commutes and the extra burden of overspill for neighbouring schools and their capacity.

We are yet to see the development of the market, with a 106 homes planned (plus windfalls coming forth), and so consider that with this increase and necessary community adjustment, **the market development should be the only large development proposed for Hatherleigh up to the lifetime of the Joint Local Plan**. We would like to see the appropriate policy change to reflect this.

Hatherleigh Town Council has provided evidence to remain with its stance of strongly objecting to the allocated increase of a further 50+ houses during the lifetime of the Hatherleigh Community Plan 2013 – 2026. We can see inconsistencies and insufficient investment and planning for community services, employment and car parking provision to enable this town to adequately support further large scale housing stock within the time line of this Joint Local Plan.

3. and is not consistent with national policy (NPPF) as it is unable to deliver sustainable development because....

For reasons stated above, ie lack of school places, questions over employment allocation proving justification that we do not have the sufficient infrastructure requirements and:

Increasing housing stock without the support of infrastructure and services will negatively impact on the current residents and will not be able to meet the needs of an incoming population.

The perceived well-being of current inhabitants is already stated in our Community Plan that growth has happened ‘*too much too soon*’.

Growing expanses of housing estates on the edges of towns exacerbates car usage and encourages a commuter culture especially when local employment is insufficient to support it. Hatherleigh falls into this category. Our small Town centre is unable to accommodate increases in traffic due to its narrow streets and we have limited space to develop facilities as we are bound by river floodplain, its moor and its bypass.

We also believe the plan does not meet the *Legal Requirement* criteria because –

1. It **fails to comply** with *WDBC's Statement of Community Involvement* because...

a) It ignores the Hatherleigh Community Plan

- Between 2011 - 13 WDBC encouraged us to be trailblazers and take part in a new consultative strategy to help them understand and guide Hatherleigh's future development. WDBC said this will help them make the right planning decisions for the town. We complied and put in 100s of volunteer hours to produce Hatherleigh's Community Plan 2013 - 2026. This plan was formally 'adopted' by West Devon Borough Council.
- The purpose of the Plan was to "give local people more of a say about the future of the town", and in particular "find out what local housing and development needs there are". The Plan delivered a vision and aims up to 2026.
- Considering that the town has had more than a fair share of housing development equating to a 26% increase in homes in the 4 years up to 2013. **The community stressed that over the lifetime of our Community Plan (up to 2026) only a 13% increase was considered sustainable to give the town time to absorb its recent and forthcoming growth** (i.e. the market development).
- Hatherleigh Market was given outline planning permission for 106 homes, this figure on this single site exceeds far beyond what the community consider to be sustainable. As this development is yet to be delivered there would be an unacceptable impact for our town if the market site and these other suggested sites were to proceed within a close proximity time frame.
- With only 4 years after completing our Community Plan WDBC are suggesting a further minimum of 50 homes for Hatherleigh. It makes our Community Plan out of date already and with the market site still potentially years away we could see another development boom happening again in this small town if all these sites are realised.
- We say this is unacceptable. We are being led to believe our Community Plan was a waste of time. We believe WDBC are not listening to us. We also believe that Hatherleigh Town Council and West Devon Borough Council will lose all credibility from its residents in any future consultations.

6. Please set out what changes you consider necessary to make the plan legally compliant or sound and why. Put forward your suggested revised wording of any policy or text.

Remove the site allocations TTV29 12 until at least the very end of this Joint Local Plan timeline - 2034.

Calculations are required to ascertain what an acceptable level of growth is. In order to create a sustainable level of growth, there should be a stated maximum percentage limit for block developments of over say 10 houses, ie no more than a 10% increase of housing stock in any 10 year period.