
From: Matthew Collins <>
Sent: 30 October 2023
To: SW-Neighbourhood Planning
Subject: Comments on Okehampton Town and Hamlets Neighbourhood Plan

To Whom It May Concern,

Please find below comments from Devon County Council's Transport Planning and Highway Development Management Teams in regarding to the proposed Okehampton Town and Hamlets Neighbourhood Plan.

In general, some of the proposed policies are unnecessary and repeat or contradict the policies set out in the National Planning Policy Framework (NPPF). The inclusion of specific proposals for a Town Centre Access Road include no details or consideration of constraints or the impacts of allocating such a proposal. Unlike the infrastructure plan that underpins the Local Plan, there is no supporting evidence for the need or any technical assessment for this road or other transport related policies. No evidence, even in the form of simple outputs from census data, have been provided to support the proposed policies.

Comments on individual proposed policies are as follows:

PP5 - Employment expansion

There is no mention of active travel links or public transport within this proposed policy. It is entirely focused on cars with the mention of the 'local road network' and parking provision. Local people seeking employment where they live need to be given opportunities to travel to and from work without the use of a private car, which can be an expensive barrier for people accessing work. This proposed policy could be considered to be contrary to NPPF paragraphs 105 and 112. Consideration should be made as to whether a Planning Officer could reach a decision on a proposal if this proposed policy is made without that decision being at odds with other planning policies.

PP7 - Small employment/starter units

This proposed policy is flawed as Devon County Council as the Local Highway Authority does not prescribe parking standards, this is a matter for the Local Planning Authority.

The proposed policy in terms of only considering adverse impacts on traffic generation is flawed. While traffic includes pedestrians and cyclists as well as motor vehicles, motor vehicles are often the main consideration. What some people may think are adverse impacts on motor traffic, such as longer delays, queuing and a loss of priority, can be beneficial to other traffic – and the health of people walking, wheeling and cycling. This policy could be contrary to the NPPF para 111 where, by implication, development can be allowed on transport grounds with adverse traffic impacts providing they are not severe.

PP10 - Pedestrianisation of the Town Centre

Seeking to close the highway to certain types of traffic would require relevant Traffic Regulation Orders (TRO). The impacts of such a proposal could be far reaching, and not just linked to the need for a new route for motor traffic – be that via Oaklands to Hatherleigh Road, or any other possibility. The supporting text states 'It would also have obvious benefits to local businesses' – however benefits are not obvious or evidenced. Enforcement of TRO(s) would fall to the police who have limited resources to carry this out meaning that the general public are likely to disobey such TROs and drive through this area anyway. The rerouting of motor vehicles as a result of this proposal would need careful and detailed consideration – the impact on air quality on Market Street for example would need to be assessed. There could also be significant issues with this proposal if the A30 was closed and traffic diverted through Okehampton.

PP11 - Car parking capacity

Devon County Council requests the expansion of this proposed policy to include cycle parking.

PP12 - Parking in residential development

This proposed policy is flawed as Devon County Council as the Local Highway Authority does not prescribe parking standards, this is a matter for the Local Planning Authority.

In urban areas higher parking provision leads to higher car use, which should be discouraged as Devon County Council and West Devon Borough Council seek to reduce carbon emissions, with 30% of Devon's greenhouse gas emissions being from transport.

Part d of this proposed policy is unnecessary as it repeats NPPF para 112(e).

PP13 – Safe access to and within the Town and Hamlets

This proposed policy lacks detail and definition. It raises a lot of questions, *inter alia*: What is accessibility? How is it measured? How is a 'transport corridor' defined? What is the proper management of these routes?

This proposed policy is both unnecessary and flawed. In terms of part a of this proposed policy, Road Safety is a duty of Devon County Council. Consideration of road safety is covered by NPPF paragraph 110, 111 and 112, and safety should extend to all people, not just pedestrians. Devon County Council as the Highway Authority is responsible for highway maintenance. Part b of this proposed policy touches on the subject of management of unknown transport corridors, which could include maintenance of the highway, which is not a matter for the Local Planning Authority or Town/Parish Councils. Part c of the proposed policy is unnecessary, as 'due attention' can be paid to the impact, but that does not mean any action is taken as a result.

The principle of all people being safe while travelling is important, but already covered in the NPPF (paras 110, 111 and 112) – the proposed policy limits the remit of this to pedestrians only, specific unidentified 'transport corridors' and the impact of only the volume of traffic. This proposed policy should be removed, or significantly reworded.

PP14 - Town Centre Access Road

The need for the 'Town Centre Access Road' is not evidenced or supported by any details other than the perception that Market Street is busy and 'totally clogged with traffic'. Building a new road will not likely result in a change to this, it will provide a short cut for some, and allow others to drive more quickly and easily instead of walking or cycling, thus resulting in more traffic and the situation at Market Street will likely remain the same. The proposed policy does not consider any ecology, drainage, air quality or landscaping constraints or consider the carbon impact of the proposal in terms of additional traffic or the construction of the scheme.

This proposed policy is contrary to the supporting text of proposed policy PP15 which states: 'It is important, for both the environment and our health, to provide opportunities and encourage more sustainable modes of transport for both resident and visitor alike.'

PP15 – Cycle routes

Devon County Council broadly supports this proposed policy, however, it should be expanded to encompass all aspects of active travel, and other areas of the town. The policy is also not worded in a way that would be useful for Planning Officers to apply against development within the town in order to secure developer contributions or refuse applications that don't add to the cycle network. The Government Target is for 50% of short urban trips to be walked, wheeled or cycled by 2030, and new developments play a key roles in ensuring adequate active travel links are provided on and off site.

Regards,
Matt

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