

Kim Rhodes

SA/0139

From: Gallacher, Gaynor [Gaynor.Gallacher@highways.gsi.gov.uk]
Sent: 07 June 2010 14:10
To: Forward Planning
Cc: Bayliss, Simon; 'Lovatt, Jon'
Subject: Dartmouth, Ivybridge, Kingsbridge, Totnes and Rural Areas Site Allocation DPDs - Highways Agency comments

Attachments: 20100607122220616.pdf



2010060712222061
6.pdf (3 MB)

Dear Forward Planning team

Please find attached the Highways Agency's comments on your recent DPD consultation.

Regards

Gaynor

Gaynor Gallacher, Business Support
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Safe roads, Reliable journeys, Informed travellers Highways Agency, an Executive Agency of the Department for Transport.

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OF THE RURAL AREAS

Our ref: South Hams LDF
Your ref: CR/GS/LDF/SADPD

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07 June 2010

via email: forward.planning@southhams.gov.uk

Dear Sir/Madam

SOUTH HAMS LOCAL DEVELOPMENT FRAMEWORK (LDF) – DARTMOUTH, IVYBRIDGE, KINGSBRIDGE, TOTNES AND THE RURAL AREAS SITE ALLOCATION DEVELOPMENT PLAN DOCUMENTS (PUBLICATION STAGE – APRIL 2010)

Thank you for providing the Highways Agency with the opportunity to respond to the South Hams Local Development Framework (LDF) Site Allocations Publication Stage DPDs. We support the objective of this work, which will inform the sites and help the District to meet its development land requirements as set out in the adopted Core Strategy. We have been involved in all stages of the preparation of the Site Allocations DPD and our comments should be read in conjunction with our previous responses to the Regulation 25 (Feb '09), Options (June '09) and Additional Sites (Jan '10) consultation stages.

The Agency's primary interest is the A38 Devon Expressway, which passes through the north of the South Hams District, and connects Exeter to the east with Plymouth to the west – it is part of the Country's Strategic Road Network (SRN). Strategic level modelling has shown that traffic demand at this location is likely to increase substantially in the period to 2026 due to development growth. Decisions on the location and size of development sites must recognise the need to maintain the SRN's strategic purpose;

The Agency looks for Development Plan Documents, including Site Allocation DPDs to be underpinned by an appropriate transport evidence base covering the following:

- a description of existing transport problems, issues and trends;
- transport objectives that are specific and distinctive, which respond to existing problems and issues, provide a sense direction for the development of transport policies and measures and which are supported by indicators against which predicted plan outcomes may be compared;
- an assessment of transport impacts of development proposals and an assessment of the options for addressing these impacts which can demonstrate their appropriateness and deliverability;

- transport evidence that underpins the proposed transport policies and which assists in explaining what is to be delivered, where it is to be delivered, when it is to be delivered and how it is to be delivered.

We expect appropriate evidence to be set out in supporting documentation with key elements included in the AAP itself. This should demonstrate the link between transport problems, objectives, the proposed policies and measures and the predicted outcomes of the plan.

I note there are a number of aspirations for transport in the AAPs but consider that the potential outcomes of the plans in relation to transport are uncertain. In particular it is not clear how development may impact on the strategic road network or whether proposed policies will assist in minimising and mitigating potential impacts.

For example, in the case of the Ivybridge Site Allocations DPD, the plan indicates that the A38 close to Ivybridge is operating at capacity. It also includes an objective to improve the self-sufficiency of the town and to ensure that new development minimises the need to travel and optimises the choices between travel modes. When it comes to policies, an approach is set out for improving self containment and to encourage more use of sustainable modes of travel for local trips within the town, but it is not clear how this policy approach will influence longer distance trips, transport emissions or congestion.

With regard to this particular DPD therefore, I am unable to understand the extent of traffic impacts on the A38 arising from development in the plan area and the extent to which the policies in the plan will minimise traffic demands on the A38, and enable adverse impacts to be mitigated. The plan proposes an eastern access and a new junction on the A38 to encourage mode shift but it is not clear how this will encourage more use of sustainable modes as opposed to encourage more car trips, including greater use of the A38.

In the absence of an appropriate transport evidence base and the uncertainty this creates, increased reliance is placed on ensuring transport issues can be adequately addressed at the planning application stage through appropriate Transport Assessments and Travel Plans and it would be helpful if this could be more clearly set out in the plans.

As a general requirement we will require applications, which exceed the indicative thresholds set out within Appendix B of the DCLG/DfT Guidance on Transport Assessments (March 2007) to be supported by a Transport Assessment (TA) or Transport Statement (TS). However, in light of the predominantly rural nature of the District, the Local Authority will require a Transport Assessment for all proposals outlined within the DPD exceeding 25 dwellings and for some non residential floor space schemes falling under the DfT indicative thresholds depending on the site's context. This should provide a comprehensive review of all the potential transport impacts of a proposed development, with an agreed plan to mitigate any adverse consequences. Our comments on the sites below should take into account the requirements of this paragraph.

The Assessment will need to consider the likely modal split of journeys to and from the site, the impact of the development upon the local and SRN and identify any mitigation works that will need to be funded by the developer, together with details of proposed measures to improve access by non-car modes. Where impacts from proposed developments are expected on the SRN, applicants are advised to consult with the Agency at pre application stage to agree on appropriate assessment criteria, and if necessary, appropriate mitigation measures. Full guidance on the content is provided in 'Guidance on Transport Assessment' DfT / DCLG (March 2007).

A Travel Plan will be prepared for all major developments in accordance with the Good Practice Guidelines: Delivering Travel Plans through the Planning Process, DfT. This should set out how the impact of travel patterns associated with the development proposal will be reduced. Travel Plans are a means by which an organisation or business can manage the transport demands of their staff and any visitors. Their aim is to reduce the environmental impact of travel associated with the enterprise. They contain a package of measures to reduce reliance on the car and promote walking, cycling and public transport use through a consideration of the requirements of staff (commuting to work and travel whilst at work), any visitors or customers to the premises and the management and purchase of company vehicles. A Travel Plan will also be prepared for all major residential developments. Please ensure you consult with the Agency when assessing a Travel Plan which relates to a development proposal identified as having an impact on the SRN.

Taking the strategic context into account, my comments on the published documents (and the development requirements and timescales that they plan for) are set out below. For ease of reference I have provided a single letter which incorporates feedback for each of the five DPD's. Each DPD is clearly headed and representations are set out in a clear and logical manner.

Infrastructure Delivery Programme

I note throughout the supporting text of the various DPD documents that reference is made to an Infrastructure Delivery Programme. It is assumed that this relates to the "South Hams Local Development Framework Strategic Infrastructure Delivery Plan" that includes within it an "Infrastructure Delivery Programme". It is noted that this IDP includes a reference to an Ivybridge eastern access including a new junction with the A38, with an unknown cost and funding source. As previously discussed the Agency is unable to contribute to the cost of any infrastructure improvements or mitigation measures required on the SRN as a result of development.

The Rural Areas DPD

Para 5.4: The vision for rural areas is supported, provided that future development within such locations is to meet local needs only.

Para 5.7: Objectives for the rural areas are also supported, particularly objective RA04. However, whilst many individual development proposals are small in scale and unlikely on their own to have a significant impact on the SRN, the cumulative effect of a number of development sites within a corridor could have a significant impact which should be considered.

Modbury

Policy RA1, West of Palm Cross Green: I have previously expressed concern at the potential for significant development within this location to have a direct impact on the function and capacity of the SRN given that it is located approximately 3 miles only to the south of the A38. The DPD is proposing to deliver 80 dwellings and 1ha of employment land.

Policy RA2, South of Poundwell Street: Proposals for this site are supported given its central location and previously developed nature. It is considered that the delivery of a small scale mixed use scheme will enhance the self-sufficiency of the village.

Salcombe

Policy RA3, Bonfire Hill: There is no objection in principle to the development of this site for provision of 100 dwellings and 0.5ha of employment land.

Policy RA4, Shadycombe: There is no objection in principle to the development of the site for the provision of 0.5ha of employment land.

Chillington

Policy RA4, Chillington Village Centre: There is no objection in principle to the development of 50 dwellings and 0.5ha of employment land.

Stokenham

Policy RA6, South of Carehouse Cross: There is no objection in principle to the development of 100 dwellings and 0.5ha of employment land.

Yealmpton

Policy RA7, North and east of Millzac Close: There is no objection in principle to the development of 100 dwellings and 1ha of employment land providing it is required to meet local needs and enhance the self-containment of the village.

Policy RA8, North of Riverford Shop: There is no objection in principle to the provision of 0.5ha of employment land in this location providing that it is required to meet a local employment need.

Aveton Gifford

Policy RA9, Land north of Village Centre: There is no objection in principle to the provision of 0.5ha of employment land in this location providing that it is required to meet a local employment need.

Avonwick

Policy RA10, Site west of Avonwick: Concern at the suitability of the site for future development remains due to the proximity of the site to the A38 and lack of local services and facilities within the village, which is likely to encourage new residents to travel to other settlements on a daily basis, which may have direct implications on the function and capacity of the SRN. I reserve further comment on this site until the necessary supporting evidence is provided and if necessary a package of mitigation measures to reduce the likely impact on the SRN.

Blackawton

Policy RA11, Land south of Cheavestone Lea: There is no objection to the principle of 10 dwellings being delivered on this site.

Policy RA12, Town Farm: There is no objection in principle to the development of 50 dwellings and 0.5ha of employment land.

Brixton

Policy RA13, Land north east of Venn Farm: There is no objection in principle to the development of 50 dwellings and 0.1ha of employment land on this site.

Dartington

Policy RA14, Webbers Yard and Sawmills Field: There is no objection in principle to the development of 95 dwellings and 1ha of employment land on this site provided it meets local needs and does not generate out commuting along the A38. The Agency would welcome the opportunity to be involved in the consideration of the proposals for the site at the earliest opportunity.

Diptford

Policy RA15, Wheatpark: Whilst the site is close to the A38 I acknowledge the proposals are for a limited scale of development. Further comment is reserved until the necessary supporting information is available for us to consider the likely impacts on the SRN.

Ermington

RA16, Land West of Ermington Workshops: As the village of Ermington is located approximately 2 miles to the south of the A38 there is the potential for significant development within this location to have a material impact on the function and capacity of the A38. I have previously expressed concern regarding this allocation, particularly as the village has limited facilities and public transport provision. I note there are aspirations to deliver a new shop as part of the scheme and I would expect this to be documented within the text of the sites allocation. Further comment is reserved until additional evidence is provided demonstrating the likely impact.

Harbertonford

Policy RA17, Harbertonford Mills: There is no objection to the principle of the proposals.

Policy RA18, Land to the north of the village: There is no objection to the principle of the proposals for 50 dwellings and 0.1ha of employment land on this site.

Holbeton

Policy RA19, Land North of Church Hill: There is no objection to the principle of the proposals.

Kingswear

Policy RA20, Land at Brixham Road: There is no objection to the principle of the proposals.

Loddiswell

Policy RA21, Land north of the village: There is no objection to the principle of the development of 60 dwellings and 0.2ha of employment land on the site.

Marldon

Policy RA22, Land at Five Lanes: There is no objection to the principle of the development of 35 dwellings and 0.1ha of employment land on the site.

Stoke Fleming

Policy RA23: Land opposite Primary School and Policy RA24: Land South of Primary School

There is no objection to the principle of the development of 60 dwellings within this location.

Stoke Gabriel

Policy RA25, Land opposite Rowes Farm: There is no objection to the principle of the development of 50 dwellings and 0.1ha of employment land on the site.

Policy RA26, Land at Paignton Road: There is no objection to the principle of the development of 80 dwellings and 0.1ha of employment land on the site.

Policy RA27: Land south of Coombe Shute: There is no objection to the principle of the development of 10 dwellings on this site.

Thurleston

Policy RA28: Land east of Seaview Road: There is no objection to the principle of the development of 40 dwellings on this site.

Ugborough

Policy RA29, Land east of the Primary School: The village of Ugborough is located 1 mile only to the east of the A38, as such any new development within this location could have a direct impact on the function and capacity of the SRN. However, I accept the proposed allocation is small-scale (20 dwellings), therefore further comment is reserved until the supporting transport evidence is produced/supplied.

Wembury

Policy RA30, Land to the south of Knighton Road: There is no objection to the principle of the development of 30 dwellings on this site.

Dartmouth DPD

Para 5.4: The vision for Dartmouth is supported, provided that future development within such locations is to meet local needs only and are accessible by a range of public transport, walking and cycling facilities.

Para 5.7: The objectives for Dartmouth, particularly objective DO5, are also supported.

Policy D1, Townstal, west of Dartmouth: Townstal: Given the distance of the site from the A38 I have no objection to the principle of the development - would welcome the opportunity to comment on the master plan as and when it is produced for consultation.

Policy D2, Collingwood Road: There is no objection to the principle of the development on the site and I note that planning permission has been secured for 45 of the 95 dwellings proposed.

Policy D3, Rook Park: There is no objection to the principle of the development of 45 dwellings and 0.1ha of employment land on the site.

Ivybridge DPD

Given that Ivybridge is located within close proximity to the A38 we have a particular interest in the location and scale of development coming forward. As way of background the existing peak period flows on the A38 around Ivybridge are well within the capacity of the route; however, regional forecasting undertaken by the Agency has indicated that this section of the A38 is likely to see substantial increases in traffic in the period to 2026. It should also be noted that the eastbound slips at the Ivybridge A38 junction (A38 / B3213) are short and link directly into a roundabout. Increased turning flows at the A38 junction (or increased traffic flows at the roundabout) have the potential to increase queuing on the eastbound offslip to the point where it extends back onto the A38 main carriageway. This is both a safety and operational concern with emerging development required to fully mitigate their impact thus ensuring local conditions at the junction are no worse with the development than if it had not taken place.

Future DPDs for this part of the District are encouraged to take account of the likely implications of additional development on the A38 and to include an explicit aim to reduce the level of out-commuting to Plymouth. This could be achieved through a balance of housing and employment provision, or through the phasing of development so that employment leads housing provision.

Para 5.3: A vision for Ivybridge that includes reference to sustainable transport links to serve its hinterland, making bespoke reference to an enhanced role for the railway station is fully supported. I also note the reference to park and ride at the railway station but it is not clear whether new rail or bus services will be provided which may influence mode share of commuter trips to Plymouth and lead to a reduction in traffic impact on the A38. It is also not clear whether improving bus connectivity to Plymouth may be an option in terms of improving sustainable travel choices and it would be helpful if this could be clarified.

Para 5.6: I support the objectives for Ivybridge, particularly objective IO1 which seeks to enhance self containment and Policy IO4, which seeks to ensure that development minimises the need to travel and optimises choice between travel modes.

Policy 11, East of Ivybridge: I have previously raised concerns regarding the proposed urban extension to the east of Ivybridge due to the potential impact of growth on the A38. It appears that this proposed urban extension will now be considerably larger than previous proposals with the DPD now proposing 100 dwellings and 5ha of employment land to the period 2016, with an additional 275 dwellings and 5ha of employment land to the period 2026. I have significant concerns about this strategy and would welcome the opportunity to be involved in the formulation of the master plan for the site at the earliest opportunity. The master plan should be informed by a robust transport strategy which identifies the likely impacts on the SRN and package of mitigation measures which will reduce the need to travel and the reliance on the SRN.

I am disappointed that an early assessment of the likely transport implications of development in Ivybridge has not been undertaken to demonstrate potential transport impacts on the A38 and how these may be mitigated. I have particular concern in relation to the suggestion that a proposed new access on to the A38 is required. The Agency has not received any evidence to support this proposal and I therefore question its need and deliverability until such evidence is

presented. Whilst the Agency will adopt a graduated and less restrictive approach to proposals for new accesses on the regional SRN (of which the A38 is part) there will still be a presumption in favour of using existing accesses and junctions. Indeed, it is important that the SRN is not regarded as a convenient means of dealing with local problems, for example by proposing additional junctions simply to relieve traffic pressures within the local area.

I must say that currently I do not consider this proposal is founded on a robust and credible evidence base, and I have concerns over the potential outcomes that will flow from the provision of a new junction on the A38 and therefore its effectiveness in delivering the objectives of the plan.

Proposal 12, Ivybridge Central Area: I have previously identified the central area as a preferred option for development in Ivybridge and I'm aware that the site benefits from an approved Masterplan. Whilst the complexities associated with sites within multiple ownership are acknowledged we are nonetheless concerned at the likely delay between the delivery of the new central area and the urban extension.

Kingsbridge DPD

Kingsbridge is located approximately 10 miles to the south of the A38 and has a range of services, facilities and public transport links. Whilst I acknowledge this is some distance from the A38 I would still expect the DPD to consider the likely impact of additional major development upon the SRN. As per my previous comments, we recommend that additional development be focused in central and sustainable locations which can be accessed by a wide range of transport modes, including public transport, walking and cycling.

Para 5.3: The vision for Kingsbridge is supported, particularly reference to the focus of the regeneration within the town centre.

Para 5.6: The objectives identified for Kingsbridge are also supported, particularly objective KO3 which seeks to ensure that development is located to minimise the need to travel and optimises the choices between travel modes.

Policy K1, North West of Kingsbridge: Whilst I would have preferred future development to come forward on brownfield sites, it is acknowledged that this site is one of the best options for growth to be accommodated in terms of availability and sustainability. I would welcome the opportunity to comment on the Masterplan as it becomes available, and I reserve further comment until the necessary transport evidence is available.

Policy K2, The Quayside: There is no objection in principle to the redevelopment of central brownfield land at the Quayside.

Policy K3, Union Road Area: There is no objection in principle to the redevelopment of central brownfield land at Union Road.

Policy K4, Garden Mill Area: There is no objection in principle to the redevelopment of central brownfield land at Garden Mill.

Policy K5, West Alvington Hill: There is no objection in principle to the redevelopment of central brownfield land at Alvington Mill.

Policy K6, Leigh Cross: I'm encouraged that the supporting text requires the provision of a Travel Plan and improved pedestrian and cycle links due to the sites detached location from the central area.

Policy K7, Avon Centre: There is no objection in principle to the proposals for the Avon Centre.

Totnes DPD

My previous response to the South Hams Regulation 25 and Options consultation expressed concerns that there is some potential for development on the outskirts of Totnes to impact on the SRN. As such future growth within the Totnes area should be served by the provision of good public transport, cycling and pedestrian networks, to reduce the reliance on the private car and future car commuting on the A38.

Para 5.4: The vision for Totnes is supported, in particular reference to the need to the enhancement of self containment and the need to reduce transport dependency.

Para 5.7: The objectives for Totnes are also supported - particularly TO4.

Policy T1, Baltic Wharf: There is no objection to the principle of the development at Baltic Wharf due to its central location and previously developed nature.

Policy T2, King Edward VI Community College: There is no objection to the principle of the proposals for the site.

Policy T3, Totnes Central Area: There is no objection to the principle of the proposals for the Central Area.

Policy T4, Dairy Crest: There is no objection to the principle of the proposals for the site, and I'm encouraged by the bespoke requirement for the provision of sustainable transport links as part of the allocation.

Policy T5, Land at Dartington Lane: There is no objection to the principle of the proposals for the site. However, given the out of centre location it may encourage additional trips on the road network, including the A38, unless carefully managed. I would welcome sight of the Masterplan previously approved by the Council.

Policy T6, Land at Ashburton Road: There is no objection to the principle of the proposals for the site. However, as with T5 above, given the out of centre location it may encourage additional trips on the road network, including the A38, unless carefully managed. I would welcome sight of the Masterplan previously approved by the Council.

Policy T7, Riverside: There is no objection to the principle of the proposals for the Riverside site.

Policy T8, Borough Park: There is no objection to the principle of the proposals for the Borough Park site, particularly given the sites close proximity to Totnes Railway Station.

Policy T9, Bourton Lane: There is no objection to the principle of the proposals for the Bourton Lane site.

Delivery, Monitoring and Flexibility

I fully support the role of the Infrastructure Delivery Group and would welcome the opportunity to advise the Group on matters relating to the SRN when required. Recognition that infrastructure required as a result of development will need to be funded by the developer is welcomed. There may be some viability issues with the delivery of some of the larger brownfield sites within the District and I agree with the Council that any reduction in developer contribution as a result of viability issues should be demonstrated by a robust evidence base.

I would expect to be consulted on any changes to the spatial strategy for the District.

Summary

The efficient movement of people and goods on the SRN has a key part to play in supporting the Country's economy. As such I'm keen to seek positive engagement in your LDF process at all stages to ensure the SRN remains available for its strategic role but also supports the economic viability and sustainable growth of the area. If you have any queries please feel free to contact me.

Yours faithfully

Ian Parsons
Network Manager
Network Delivery & Development South West - Planning
Email: ian.parsons@highways.gsi.gov.uk

cc: Simon Bayliss, GVA Grimley
Jon Lovatt, AECOM

SA/0164

Kim Rhodes

From: POWELL, Thomas [Thomas.Powell@english-heritage.org.uk]
Sent: 10 June 2010 13:42
To: Forward Planning
Cc: SIMMONDS, Ross
Subject: South Hams.doc
Attachments: South Hams.doc


Please find attached English Heritage's consultation response for the South Hams Local Development Framework - Dartmouth, Ivybridge, Kingsbridge, Totnes and the Rural Areas Site Allocations Development Plan Documents.

Regards,

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SOUTH WEST REGION

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10 June 2010

Dear Mr Swiss,

Re: South Hams Local Development Framework - Dartmouth, Ivybridge, Kingsbridge, Totnes and the Rural Areas Site Allocations Development Plan Documents

Thank you for your consultation letter of 30th April 2010 regarding South Hams' Site Allocations Development Plan Documents (DPDs), as part of the Local Development Framework.

English Heritage is the government's lead advisory body for the historic environment and as such gives advice on development proposals affecting listed buildings, scheduled monuments, registered parks and gardens and conservation areas. In this instance English Heritage would not seek to provide detailed comments but do offer the following observations, which we would hope the council would address in due course.

Government policy recognises the unique place the historic environment holds in England's cultural heritage and the multiple ways in which it supports and contributes to the economy, society and daily life. The role of the LDF is to set out specific positive and proactive policies for the area that will lead to the objectives of PPS5 being achieved.¹

PPS1 emphasises the Government's commitment to protecting and enhancing the quality of the natural and historic environment. Paragraph 19 makes it clear that, in order to achieve this; plans should be based upon 'recognition of the limits of the environment to accept further development without irreversible damage'.

¹ Planning for the Historic Environment Practice Guide, Paragraph 33

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Totnes Site Allocations

Proposal T1: Baltic Wharf

SA/0164

Although it is generally agreed that the proposed high quality mixed use redevelopment of



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Baltic Wharf offers an opportunity for more effective and efficient use of the land, as well as increased public interaction with the River Dart; English Heritage would urge the Council to investigate further the potential impact that such a redevelopment could have on the nationally significant designed landscape of Sharpham House Park and Garden. Sharpham House is a grade II* site (PAG 1692), and as such falls within the top 40% of the sites listed on English Heritage's Register of Parks and Gardens of Special Historic Interest. Although the proposed site lies along side the historic C18 entrance to Sharpham House it is recognised that previous development has taken place near the entrance of Sharpham Drive and that the proposal site is somewhat obscured from view due to the lie of the land which slopes eastwards towards the River Dart. Nonetheless, it is our recommendation that in order to inform future proposals the impact of any new development upon the significance of the asset and the way in which it is subsequently experienced should be considered and appropriate mitigation provided.

Proposal T5: Land at Dartington Lane

The proposed development at Dartington Lane lies on land immediately in front of Dartington Lodge (LB UID 101045), the grade II pair of lodges at the south entrance to Dartington Hall park (PAG 1421). Dartington Hall park is a grade II* Registered park and garden and, therefore, English Heritage would be concerned about the impact that such a development might have on the setting of the historic entrance to Dartington Hall and the effect upon the significance and subsequent interpretation of the landscape.

Whilst it is recognised that this is not yet an application it is worth reminding ourselves of PPS5 HE10.1 which states that 'when considering applications for development that affect the setting of a heritage asset, local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. When considering applications that do not do this, local planning

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authorities should weigh any such harm against the wider benefits of the application'.

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Although there is no evidence that the historic parkland extended to the land at Dartington Lane this area is considered as a valuable buffer zone to Dartington Hall, helping to ensure that its significance is preserved.

As pointed out in PPS5 HE9.1 'once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'. Therefore, English Heritage would ask the council to examine the impact of the proposals upon Dartington Hall and provide appropriate mitigation measures if development is to be approved.



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Rural Areas Site Allocations

Although the majority of the proposed developments do not impact greatly upon the historic environment English Heritage has concerns over the following proposals:

Proposal RA2: South of Poundwell Street

Although it is not proposed to develop within this area before 2016 it should be pointed out that development in Modbury does have the potential to impact upon the setting and historic character of the grade I listed Church of St George (LB UID 99708). Whilst the locality of this highly graded asset does not prevent the allocation of this land, its setting and any potential harm to it should be considered and a high quality scheme that is appropriate to the character of the area ensured.

Proposal RA19: Land North of Church Hill

The proposed development site in Holbeton is almost directly opposite All Saints Church, a grade I listed asset (LB UID 100357), and would, therefore, almost certainly impact upon the setting and character of the church. Once again, therefore, quality development would be essential and regard must be given to the character and setting of the heritage asset.

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Proposal RA21: Land North of the Village

Likewise the area indicated for development in Loddiswell is of concern due to its close proximity to the Grade II* listed church of St Michael and All Saints (LB UID 99558) and its associated cemetery.

English Heritage would expect South Hams District Council to bear in mind these comments and ensure that appropriate mitigation be provided to protect the setting and character of these nationally significant heritage assets. If you have any queries about the above advice please do not hesitate to contact us.

Yours sincerely,

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30 June 2010

Dear David

Re: Site Allocations DPDs Publication Stage – April 2010
 South Hams Local Development Framework

Thank you for the opportunity to comment on the above Site Allocations DPDs.

Devon County Council welcomes these as a positive step towards the adoption of a set of District wide allocations in support of the adopted LDF Core Strategy.

However, there are a few areas in which the County Council wishes to make representations and some specific site related objections which are included in the appendix. These include some sites where sole residential or employment use may be preferable on highway grounds.

The documents were obviously approved for publication prior to the General Election and the subsequent formation of the coalition government, which has begun the process of abolishing the Regional Spatial Strategy. Whilst it is assumed that the District Council is intending to continue to allocate development in accordance with the adopted Core Strategy, advice will need to be included to confirm this. From its perspective, the County Council is reaffirming the policies set out in the adopted Devon Structure Plan and these strongly support focussing development not located at the main urban areas at the market towns. Similarly it supports the broad scale of development being proposed in the context of the most recent assessments of housing need within the south west Devon area.

The documents would however benefit from advice as to the status of representations to these documents, are the District Council intending to submit these documents as are they together with representations, or are they intending to make changes in response to them and then make a formal submission?

DCC has no strategically significant specific policy objections to the proposals other than to raise objection to the inclusion of site K6 at Leigh Cross, Kingsbridge which is considered to be unsustainable in transport terms, as well as being in the countryside covered by an AONB national designation.

DCC has no overall objections to the proposals as Education Authority and increased housing development is not anticipated to require action except where appropriate requirements have been properly included in the Infrastructure Delivery programmes attached to each document.

Transport as a whole needs to be considered holistically across the whole District as well as for each settlement and site, minimising the use of the car in new developments.

A number of sites have potential environmental and/or archaeological interest which will need to be considered when applications for development or the production of Masterplans are proposed.

We hope that the detailed comments set out in the appendix to this letter are beneficial in moving towards a sound set of Site Allocations together with the supporting Infrastructure Delivery Programme as attached to each. We would be happy to discuss in more detail the comments we have made in this representation.

Yours Sincerely

Ian Harrison

Deputy Executive Director, Environment, Economy and Culture Directorate

DCC representations to the South Hams Site Allocations DPD

June 2010.

DARTMOUTH

An explanation of how the development of these sites will alter the issues about industrial traffic in the town would help make the plan clearer.

D1 – Townstall, West of Dartmouth

The roundabout accessing the current park and ride site should be the main point of entry. Access to residential, retail, healthcare and other community facilities should be separated from that for commercial elements and the re-located Park and Ride.

D2 – Collingwood

Given the currently approved development, it would be beneficial if employment uses were removed from the area and the whole given over to residential in order to avoid heavy goods traffic in a residential area.

D3 – Rock Park

Access should be from Archway Drive. The site is not suitable for employment purpose in order to avoid heavy goods traffic in a residential area.

KINGSBRIDGE

K1 – North West of Kingsbridge

The site should be accessed off Treble Park.

K2 – The Quayside

The site is considered to be suitable for residential development but not employment due to the quality of access. The historic Quay will need archaeological assessment and evaluation prior to any consents.

K3 – Union Road area

As this area can be accessed without entering the town, it would be better used as employment allowing other areas to be developed as residential.

K4 – Garden Mill area

This area is not suitable for any additional development because of the poor access.

K6 – Leigh Cross

Unsuitable for development owing to its unsustainable location in the open countryside within an Area of Outstanding Natural Beauty, a national designation.

K7 – Avon Centre

As the surrounding area are completely residential with the serving road network not conducive to commercial traffic, this site would be better allocated as residential with the existing use relocated.

IVYBRIDGE

I1 – East of Ivybridge

The masterplan will need to address the transport issues as a high priority given that any traffic generated will, at present, have to go through the town. The provision of employment is more desirable in order to reduce the daily commute (especially to Plymouth).

TOTNES

A holistic approach to transport in Totnes is supported.

T2 – KEVICC

A link road should be provided between this site and T4 (Dairy Crest) granting an access to Ashburton Road, which would help ameliorate traffic difficulties in this area.

T4 – Dairy Crest

See T2.

The Brunel Pumping House is a significant historic structure requiring particular care.

T7 – Riverside

Any employment land will need to be accessed via Steamer Quay Road.

T9 – Bourton Lane

This site is not supported due to the difficulty of providing a suitable access that would not exacerbate existing traffic difficulties.

RURAL AREAS

Modbury – RA2 South of Poundwell Street

This site is not supported because of potential traffic impacts.

Salcombe – RA3 Bonfire Hill

The Park and Ride should be located to the North of the site.

Stokenham – RA6 South of Carehouse Cross.

Neither of the sites have safe footpath links. As these would be very difficult to rectify these sites are not supported.

Diptford – RA15 Wheatpark

Any footpath provision along the existing road would narrow the road to an unacceptable degree.

Holbeton - RA19 North of Church Hill

An alternative site next to Orchard Cottages would be more suitable in transport terms.

Marldon - RA22 Land at Five Lanes

From a highways perspective, land at Westerland Green Farm would be preferable.

Thurlstone - RA27 Land south of Coombe Shute

This site is unsuitable on highways grounds.

Ugborough - RA29 East of Primary School

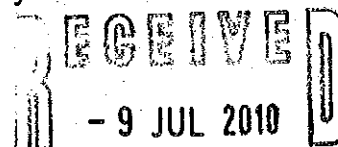
Notwithstanding ownership issues, the provision of a suitable access would be very difficult.

creating a better place



Mr Graham Swiss
South Hams District Council
Follaton House Plymouth Road
Totnes
Devon
TQ9 5NE

Our ref: DC/2006/000330/SL-
01/PO1-L01
Your ref: CR/GS/LDF/SADPD
Date: 06 July 2010



Dear Mr Swiss

South Hams Local Development Framework – Dartmouth, Ivybridge, Kingsbridge, Totnes and the Rural Site Allocations Development Plan Documents (Publication Stage)

Thank you for the recent consultation with regards to the above Development Plan Documents. We apologise for the lateness of this reply but this has been due to a reduction in staff over the last two months. We generally support the allocations presented within the DPD's and have taken this consultation to reiterate the environmental constraints and opportunities present on the sites. We hope to have some further discussion regarding flood risk in Totnes at a later stage.

Kingsbridge

Groundwater and Contaminated Land

The site areas proposed for development are located on a geological formation classed as a minor aquifer and a groundwater vulnerable zone. Therefore, there may be a risk of potential contamination to controlled waters from previous, current or existing site uses (eg. industrial buildings, timber yards, former railways etc) within some of the areas proposed for development. Requests for further detailed investigations which may be required, will need to be addressed at the planning implementation stage.

Habitat and Biodiversity

Allocation K2

Site is adjacent to Salcombe-Kingsbridge Estuary SSSI. Opportunities for setting back the development to increase the inter-tidal area should be explored in line with the Shoreline Management Plan and Biodiversity Action Plan.

Allocation K4

Environment Agency
Sir John Moore House, Victoria Square, Cornwall, Bodmin, PL31 1EB.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
Cont/d..



Opportunities to enhance the watercourse and pond should be explored. A suitable buffer should be left between these features and the development (usually 7m for watercourses). An assessment of the ecological value of the pond may be necessary. Wildlife corridors should be conserved in line with relevant policies (PPS9, NERC Act, Green Infrastructure).

Allocation K7

Opportunities to enhance the watercourse on the western boundary should be explored. A suitable buffer should be left between the watercourse and the development (usually 7m). Wildlife corridors should be conserved in line with relevant policies (PPS9, NERC Act, Green Infrastructure).

Flood Risk

Allocation K1

All flood risk issues covered in 6.12

Allocation K2

Flood issues referred to in 6.18

Allocation K3

All Flood Risk issues covered in 6.21

Allocation K4

Development of this site should provide opportunities to improve the flood risk in the area.

Allocation K5

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

Allocation K6

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

Allocation K7

The Kingsbridge North Watercourse runs North to South along the Western edge of the site. This is a 'Main River' and any works within 7m of this will require consent.

Totnes

Biodiversity

T1 Baltic Wharf

There must be no encroachment into the river Dart or leaf buffer zone and opportunities for increasing this buffer/wildlife corridor should be explored in line with relevant policies (PPS9, NERC Act, Green Infrastructure).

T2 West (Kevicc)

This site is an Unconfirmed Wildlife Site containing semi-improved neutral grassland, wet grassland, streams, wildlife corridors and bat flightpaths. An Ecological Assessment was to be prepared. Please see our previous comments.

There must be no encroachment into the river Dart buffer zone and opportunities for increasing this buffer/wildlife corridor should be explored in line with relevant policies (PPS9, NERC Act, Green Infrastructure).

T4 Dairy Crest

There must be no encroachment into the Mill Leat buffer zone and opportunities for increasing this buffer/wildlife corridor should be explored in line with relevant policies (PPS9, NERC Act, Green Infrastructure).

T5 Land at Dartington

This site appears to be wooded. We would require information relating to the ecological value of this woodland to enable us to comment.

A suitable buffer zone should be retained between the watercourse and the development (usually at least 7m). The Environment Agency will need to see details of these proposals as flood defence consent may be required. Waterside wildlife corridors should be conserved and enhanced in line with relevant policies (PPS9, NERC Act and Green Infrastructure).

T6 Land at Ashburton Raod

A suitable buffer zone should be retained between the watercourses and the development (usually at least 7m). The Environment Agency will need to see details of these proposals as flood defence consent may be required. Waterside wildlife corridors should be conserved and enhanced in line with relevant policies (PPS9, NERC Act and Green Infrastructure).

Ivybridge

I 1 East of Ivybridge

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

I2 Ivybridge central

There must be no encroachment into the river Erme buffer zone and opportunities for increasing this buffer/wildlife corridor should be explored in line with relevant policies (PPS9, NERC Act, Green Infrastructure).

Dartmouth

Biodiversity

Where sites contain watercourses or wetland features, opportunities to restore natural features and enhance biodiversity value should be explored. A suitable buffer zone should be retained between the watercourse/feature and the development (usually at least 7m). The Environment Agency will need to see details of these proposals as flood defence consent may be required. Waterside wildlife corridors should be conserved and enhanced in line with relevant policies (PPS9, NERC Act and Green Infrastructure).

Where proposals fall within nature conservation designated sites (eg. RA3 & RA4 are County Wildlife Sites), Devon Biodiversity Records Centre should be contacted for more details to ensure that there are no adverse impacts upon interest features. Ecological assessment and mitigation/compensation may be necessary if protected species or BAP habitats are present.

Flood Risk

SA1015
D1, D2 and D3

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

Ground Water and Contaminated Land

D1 and D2

Will need to ensure there are no significant issues relating to contamination from previously developed (brownfield) industrial sites. The area proposed for development lies within a groundwater vulnerable zone.

Rural

RA 1

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 2

There may be some flood risk associated with the watercourse which runs through the local area. This has not been assessed.

RA3

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA4

Site should be laid out sequentially according to vulnerability to flood risk and provision of safe access and egress.

RA5

There are some serious flood risk issues associated with the Southern part of the site which have not been addressed or assessed as part of the Strategic Flood Risk Assessment.

RA6

Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 9 – Part of the area identified is within Flood Zone 3 and there is one record of historic flooding. A Flood Risk Assessment will be required to determine the full level of risk. Any development would need to be laid out so that the most vulnerable development is within the lowest risk area. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 10 – A Watercourse runs along the western edge of the site, a Flood Risk Assessment will be required to determine the flood risk at the site.

RA 11 – No Known flood risk issues

RA 12 - Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

SA1015

RA 14 - No Known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 15 - No Known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 16 – Flood risk issues covered in 6.104

RA 17 – Flood risk not covered should be as 6.112

RA 18- Flood risk covered in 6.112

RA 19 – No known flood risk issues.
Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 20 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 21 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 22 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 23 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 24 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 25 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 26 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 27 – Flood risk issues covered in 6.156

RA 28 - No known flood risk issues. Will need to ensure that there is no increase in run-off as a result of the development, taking into account the potential impacts of climate change.

RA 29 - A watercourse runs North to South along the Eastern boundary of the site. There is an area of Flood Zone 3 associated with this watercourse. A site specific Flood Risk Assessment will be required to identify the exact flood risk issues and to lay the site out to address the issues.

Yours sincerely

Shaun Pritchard
Planning Liaison Officer

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