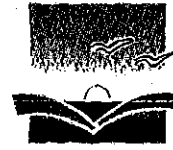


*(Causeway Harberton Harberton DC)*

# South Hams Local Development Framework Publication Stage Representation Form

Dartmouth Site Allocations DPD  
Ivybridge Site Allocations DPD  
Kingsbridge Site Allocations DPD  
Totnes Site Allocations DPD  
Rural Areas Site Allocations DPD



South Hams  
District Council

For Official Use Only

Reference No.

SA/1009

Date Acknowledged

[Empty box for Date Acknowledged]

RECEIVED  
- 5 JUL 2010

Please read the guidance notes before completing this form.

**This form has two parts: Part A - Personal details and Part B - Your representation(s).  
Please fill in a separate form (part B) for each representation you wish to make.**

All comments should be received no later than 4.00pm on 11<sup>th</sup> June 2010.

Please note: the consultation period has been extended to 4.00pm on 2<sup>nd</sup> July 2010.

## PART A

### 1. Personal Details

### 2. Agents Details (if applicable)

Title	Mr	Mr
First Name	Philip	Marc
Last Name	Cleave	Willis
Job Title (where relevant)		
Organisation (where relevant)		Willis & Co.
Address Line 1		30 The Causeway
Line 2		
Line 3		Chippenham
Line 4		Wiltshire
Post Code		SN15 3DB
Telephone Number		01249 444975
E-mail		willisplan@aol.com

**Please Note:** Following the Publication Stage consultation on the five Site Allocations DPDs, if you wish to be notified by the Council of submission for independent examination, publication of the Inspector's report following the examination, or adoption of the DPDs, please tick this box.

### Data Protection

Please note that comments cannot be treated as confidential and will be made available for public inspection at the Council offices, available to view on the Council's website ([www.southhams.gov.uk](http://www.southhams.gov.uk)) and via the Council's consultation portal (<http://consult.southhams.gov.uk/portal>). Your personal information will be held by South Hams DC for the above purpose, in accordance with the Data Protection Act 1998 and will be held securely at all times.

PART B  
YOUR NAME:

Mr P. Cleave

**2. To which Development Plan Document does this representation relate?**

Dartmouth  Totnes   
 Ivybridge  Rural Areas  (please specify which settlement below)  
 Kingsbridge  Harberton

**3. To which part of the Development Plan Document does this representation relate?**

Paragraph No.  Proposal No. RA18 Other

**4. Nature of Representation**

Do you consider the DPD is:

(1) Legally Compliant \*

Yes  No 

(2) Sound \*

Yes  No → If you have selected **No** to question 4(2), please continue to section 5

→ In all other circumstances, please go to question 6

**5. Soundness**Do you consider the DPD unsound because it is not:

(1) Justified  (2) Effective  (3) Consistent with National Policy

\* Please see the guidance notes that accompany this form for an explanation of Legal Compliance and the Tests of Soundness.

Please fill in a separate sheet for each representation you wish to make.

**6. Your representation**

Give details of why you consider the Development Plan Document is not legally compliant or is unsound, or if you consider the Development Plan Document to be legally compliant and sound, please also use this box to set out your comments (please be as precise as possible).

Please refer to the attached letter.

## PART B

YOUR NAME:

Mr P. Cleave

DPD:

Roval Areas

**7. Changes to the DPD**

Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the attached letter

**Please note:** Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**8. Examination**

If you are seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate in the oral examination

Yes, I wish to participate in the oral examination

It is important to note that written and oral representations carry exactly the same weight and will be given equal consideration in the examination process.

**9. Examination participation**

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature

Date

30/06/2010

Representations can also be made online via the Council's consultation portal at  
<http://consult.southhams.gov.uk/portal>

Please return this form by 4pm on 2<sup>nd</sup> July 2010 to:

Email: [forward.planning@southhams.gov.uk](mailto:forward.planning@southhams.gov.uk)

Post: Forward Planning Team, South Hams District Council, Follaton House, Plymouth Road,  
Totnes, TQ9 5NE

Fax: Marked Forward Planning (01803) 861404

For any enquiries please call 01803 861202

**Willis & Co.**

Chartered Town Planners  
30 The Causeway  
Chippenham  
Wiltshire  
SN15 3DB

**Our ref:** MW/Cleave

30<sup>th</sup> June 2010

Forward Planning Team  
South Hams District Council  
Follaton House  
Plymouth Road  
Totnes  
TQ9 5NE

Telephone: (01249) 444975  
Facisimile: (01249) 655556  
Email: Willisplan@aol.com

Dear Sir,

**Town and Country Planning Act 1990  
South Hams LDF Consultation  
Land East side of Tristford Road, Harberton, Totnes, Devon.**

1. I am instructed by Mr P. Cleave of Lower Cholwell Farm, Harberton to make the following representations regarding the draft Rural Areas DPD. Briefly, we seek the transfer of a small number of the dwellings proposed in the draft DPD on land North of the Petrol Station at Harbertonford to the above site at Harberton.

2. The local planning authority is to be commended for producing a draft Rural Areas DPD which does allow for modest housing growth outside of the main towns and larger villages. Many local planning authorities interpret Government guidance on housing and sustainability in such a way as to force all housing development away from rural areas towards the main settlements. Such an approach does not reflect the existing range of transport, social and economic links and also makes housing in smaller villages more scarce and therefore more unaffordable to local people.

3. However, the result of the sustainability assessment is to prevent additional housing being allocated to settlements where there is no village shop and no primary school. Whilst these may be regarded as fairly obvious markers of what might be called a 'sustainable' settlement, there are other factors which are equally as important.

4. Primary schools rarely draw their full school role from a single settlement. Most draw their pupils from several nearby settlements. Again, whilst it may be desirable for pupils to live within walking distance of their primary school so that they may walk to and from school, this is

Contd.../

# Willis & Co.

- 2 -

Forward Planning, South Hams DC

30<sup>th</sup> June 2010

## **Land East side of Tristford Road, Harberton, Totnes, Devon.**

simply unrealistic in an area where the population is sparse and also where the population is aging. The link between the lack of affordable housing in rural areas and families with young children being forced to move to nearby towns has been well established.

5. The same is true of village shops. In these days of supermarkets and internet shopping, people living in relatively remote areas are likely to combine shopping trips with employment and social journeys, often using the internet to order larger items (both the 'weekly shop' and comparison goods, for example 'white goods' and household appliances).

6. Vital and viable villages should not therefore be identified simply by reference to the existence of a primary school and a village shop. The availability of public transport, employment provision, community facilities, small and medium businesses, public houses and a strong social network including clubs and societies are also indicators of sustainable settlements. All of these can be found at Harberton. Some local planning authorities have recognised that there are also strong relationships between settlements in close proximity to one another and that the strengthening of one settlement can have positive impacts on its close neighbours.

7. Such is the case with the Parish of Harberton. The Civil Parish has a population of some 1,285 (ONS 2001), mainly based in two settlements, the larger settlement of Harbertonford and the smaller settlement of Harberton. The Rural Areas DPD puts forward two sites at Harbertonford, RA17 (Old Mill) for 10 dwellings and RA18 (North of the Petrol Station) for 50 dwellings. Various concerns have already been raised by the local community regarding these two sites, including flood risk issues and the deliverability of both sites within the plan period. No housing sites have been put forward at Harberton.

8. This representation seeks the allocation of a 0.2 hectare (0.5 acre) site on the east side of Tristford Road, Harberton as shown edged red on the enclosed plan for the erection of nine dwellings as an alternative to part of the larger site at Harbertonford. This site is well-related to the village, close to existing facilities and has no obvious constraints (i.e. access, flooding, etc.). It has limited impact on the landscape and is within walking/cycling distance of the Bridge Farm Industrial Estate and is a short distance from the bus stop for bus services to Totnes and beyond.

Contd.../

# Willis & Co.

- 3 -

Forward Planning, South Hams DC

30<sup>th</sup> June 2010

**Land East side of Tristford Road, Harberton, Totnes, Devon.**

9. Of course, in accordance with Local Plan policies 60% of these nine units (i.e. five units) will be affordable/social housing and the remainder will be open market housing, all of which will benefit the settlement of Harberton.

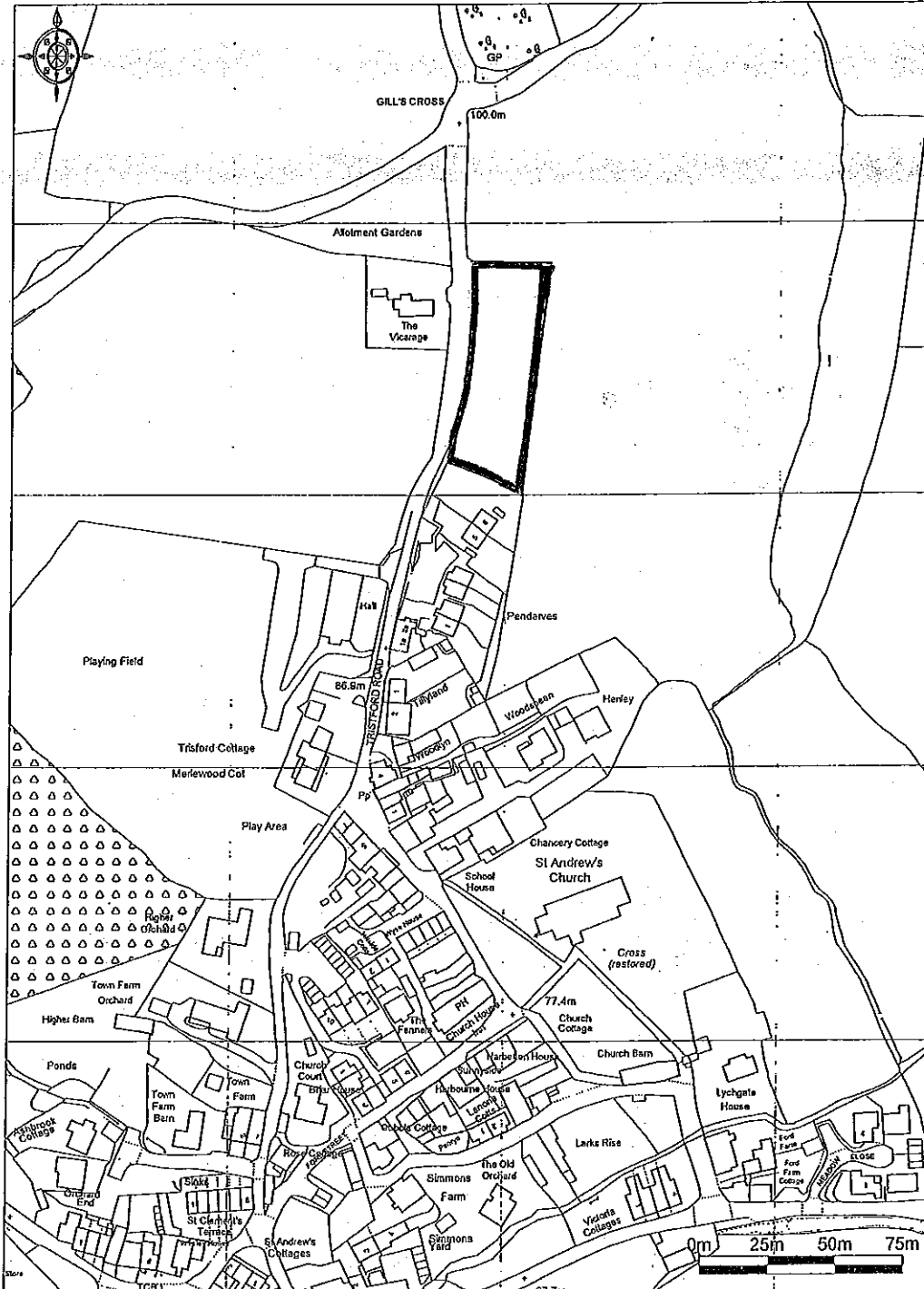
10. The local planning authority may wish to consider reducing the number of dwellings to be provided on the RA18 (North of the Petrol Station) site at Harbertonford and transferring part of the allocation to the site at Harberton.

11. Allowing for a slightly smaller number of dwellings at the RA18 site at Harbertonford may help to overcome some of the objections to the scale and density of the development and the flood risk issue.

Yours sincerely,

Marc D. Willis BTP-MRTPI-MBIAC

Land at Harberton, Totnes, Devon



Ordnance Survey © Crown Copyright 2010. All rights reserved.  
Licence number 100026449. Flotted Scale - 1:2500