



**South Hams  
District Council**

**South Hams Local Development Framework  
Kingsbridge Site Allocations Development Plan  
Document**

**Statement of Representations – Regulation 30**

**July 2010**

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1. This Statement accompanies the Submission of the Kingsbridge Site Allocations Development Plan Document (DPD) to the Secretary of State. It sets out information required under Regulation 30(e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. It documents:
  - the number of representations made
  - a summary of the main issues raised in those representations.
2. The publication stage for the Kingsbridge Site Allocations DPD ran from 30 April to 4pm on 2 July 2010. This DPD proposes sites for housing, employment and associated community facilities to meet the requirements of the adopted Core Strategy to 2016 and also includes provision for the period beyond 2016.
3. A total of 52 bodies and individuals responded to the consultation and raised 124 representations on this DPD (including 3 late responses raising 13 representations).
4. The main issues raised under Regulation 28 can be grouped into the following areas: issues of process, issues about the general approach to development adopted and some site specific comments. The main issues for each area are detailed below.
5. Issues of Process
  - The adequacy of the consultation process, particularly in respect of the EbD process and Proposal K6: Leigh Cross
6. Issues about General Development Approach
  - The deliverability of the strategy
  - The adequacy of the evidence base in relation to infrastructure delivery
  - If the plan adequately supports/promotes sustainable transport
  - The adequacy of sewerage capacity to accommodate levels of growth proposed and possible need for some localised improvements to water supply
  - Whether sufficient weight has been given to the need to re-use of brownfield land
  - Implications of abolishing the RSS
  - The level of employment development needed, especially as some industrial units were taken down to make way for a new supermarket
  - Need to include further guidance on the type/nature of employment and commercial development that would be appropriate
  - Justification and deliverability of housing and affordable housing and whether it will meet needs
  - The usefulness of the Vision diagram
  - The use of 'fuzzy edges' to define some sites

- If and how the plan seeks contributions to infrastructure elements and/or uses CIL (particularly with regard to improvements to the secondary school)
- Justification for the need for housing and affordable housing
- Loss of agricultural land
- Impact of climate change
- Groundwater vulnerable zone

#### 7. Proposal K1: North West of Kingsbridge

- Need to bring forward brownfield sites in advance of greenfield sites
- Adequacy of the evidence base that supports the deliverability of this site and a fair assessment against other sites
- Infrastructure
- Traffic
- Number of houses proposed and how they will be affordable and available for local people
- The need for employment land to be included
- Alternative access of Trebble park
- Flooding issues and possible conflict with PPS25

#### 8. Proposal K2: Quayside

- The availability and deliverability of a site in multiple ownership
- Suitability of the site for continuing employment use for access reasons
- Need to protect the employment land
- Need to enable community aspirations for a Community Centre to be met
- Justification for the number of dwellings
- Loss of parking
- Flooding issues and possible conflict with PPS25
- Impact on SSSI

#### 9. Proposal K3: Union Road Area

- The availability and deliverability of a site in multiple ownership
- Density
- The need to protect existing employment land
- The appropriateness of mixed-use on this site
- Need to enable community aspirations for a Community Centre to be met
- Flooding issues and possible conflict with PPS25

#### 10. Proposal K4: Garden Mill Area

- Access difficulties
- Flooding issues and possible conflict with PPS25

#### 11. Proposal K5: West Alvington Hill

- Need to bring forward brownfield sites in advance of greenfield sites
- Traffic impacts
- Suggestion of alternative access via Belle Cross and/or Rock Park Road
- Environmental impacts
- Impact on neighbouring properties
- Number of houses proposed and how they will be affordable and available for local people
- Need for employment land
- Whether mixed use development is appropriate for this site
- Viability, particularly due to the steepness of the site
- Impact on AONB
- Loss of trees

#### 12. Proposal K6: Leigh Cross

- Possible conflict with PPS7, Devon Structure Plan CO3, Development Policies DP1
- Impact on AONB
- Visual Impact
- Impact on landscape character
- Whether the strategic landscaping required is sufficient to address the landscape impact
- Remoteness of the site relative to the town centre of Kingsbridge and adequacy of transport links between the site and the town
- Viability of the proposed employment estate in the longer term, as site constraints would prevent future expansion
- Justification and need for employment units, and if there is currently an over-supply of employment land in the locality
- Traffic Issues, particularly the dangerous junction at Sorely Cross
- Impact on environment
- Noise and air pollution
- Impact on wildlife
- Impact on caravan park and tourism
- Loss of agricultural land and viability impact on the farm
- Infrastructure
- Impact on farm, light pollution and impact on local economy
- Has sufficient consideration be given to possible alternative sites, particularly Torr Quarry

#### 13. Proposal K7: Avon Centre

- Need to retain in current use versus benefit of relocating existing use
- Number of units proposed
- Adequacy of supporting infrastructure
- Traffic impact

