



**South Hams
District Council**

**South Hams Local Development Framework
Rural Areas Site Allocations Development Plan
Document**

Consultation Statement

Statement of Representations – Regulation 30

July 2010

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

01803 861234
forward.planning@southhams.gov.uk

1. This Statement accompanies the Submission of the Rural Areas 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 Rural Areas 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 include provision for the period beyond 2016.
3. A total of 867 bodies and individuals responded to the consultation and raised 3293 representations on this DPD (including 18 late responses raising 52 representations).
4. An annex to this statement sets out a more detailed summary of these representations.
5. 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 suggested alternative approaches, site specific comments on each of the sites proposed, and additional sites suggested. The main issues for each area are detailed below. To aid clarity the section on the general approach to development has been sub-divided as follows: General Approach, Vision and Objectives, Evidence Base, Choice of Villages, Deliverability, Housing, Employment and Other Issues. The section on each town and village is also divided in General Comments and then Site-specific comments. Comments relating to site omissions are found in the relevant town or village section, and comments on omitted villages are found at the end of the whole document.
6. Issues of Process
 - The adequacy of the consultation process in respect of:
 - Compliance with the SCI
 - Transparency and openness
 - User friendliness of the response forms and online media
 - Involvement of some Town and Parish Councils
 - Notification in local press
 - Explanation of the reasoning between changing format of document from Totnes and Dartington DPD to Site Allocations DPD, as it relates to Dartington
 - How previous consultation responses have fed into the process. The validity and transparency of the EbD process and the weight and importance given to the PFBE final report (DRA).

- Whether the approach taken to deal with issues affecting the Totnes and Dartington area is correct in light of the Council's decision to produce five Site Allocation DPDs using a conjoined process.
- Whether the Site Allocation DPDs are the correct place to deal with developer contributions and/or the Community Infrastructure Levy.
- Whether the evidence base (SHLAA, STA, DRA, SID and other documentation) has been subject to sufficient engagement and consultation
- Whether a review of Dartington Special Policy Areas should have been included in the DPD
- Whether input from Devon County Council Highways should have been site specific
- Whether Environment Agency input on flooding has been adequate, accurate and given at the right time
- Whether the Core Strategy should have been reviewed before progressing Site Allocation DPDs
- Whether waste sites should be shown on the Proposals Map
- Suggestion that the process adopted to prepare the DPDs is better suited to the four town DPDs than the Rural Areas DPD

7. Issues about General Development Approach

General Approach:

- Level of growth and compliance with the Core Strategy (and RSS), particularly in relation to village allocations by 2016, and whether Core Strategy should have been reviewed before progressing Site Allocation DPDs
- Whether the plan period should be up to 2016 or beyond
- Whether the approach to sites beyond 2016 is correct
- Consistency with national policy, Devon Structure Plan and other adopted Local Development Framework and Local Plan policies and other relevant plans such as the South Devon AONB Management Plan
- Distribution and numbers across the rural areas, particular concerns that Stoke Gabriel and Dartington parish have a disproportionate amount of development
- Whether the housing numbers should be increased to reflect the non-delivery at Sherford to date
- Whether the plan should set out the Council's approach to CIL contributions
- The inclusion of some windfall sites as allocations
- The non-inclusion of some departure sites as allocations
- The inclusion of some sites which already have planning permissions and/or have been built as allocations
- The non-inclusion of some sites which already have planning permissions within the housing numbers
- Whether the links between all the LDF documents, particularly the Affordable Housing DPD are clear

- The consequences of changing format of document from Totnes and Dartington DPD to Site Allocations DPD in that some issues are explicitly not considered
- Whether other policy areas (such as Town Centre Zones, the Dartington Special Policy Area, open space protection policies, employment land protection policies and development boundaries) should be included in the Site Allocations DPD
- Impact of RSS abolition and changing government policy
- Whether the plan makes the best use of brownfield opportunities and/or allocates too much greenfield land
- Whether sufficient attention has been paid to the links between housing and employment
- Compliance with SEA regulations

Vision and Objectives

- Support for the vision
- Whether the vision is achievable and deliverable
- Whether the objectives need better definition and more local specificity
- Whether the objectives are too general and need to relate better to realistic timescales and infrastructure delivery mechanisms

Evidence Base

- The robustness, clarity and transparency of the site selection process
- Whether the evidence base (SHLAA, STA, DRA, SID and other documentation) is robust and whether it supports the site selection process
- Lack of clarity and insufficient explanation regarding evidence
- Whether due consideration has been given to possible alternative sites
- Reliability of the SID (particularly in transport planning).
- The weighting given to different STA criteria and between strands of evidence
- Perceived conflicts between suitability conclusions within SHLAA and STA
- Adequacy of evidence around issues of green space including open space audit
- The need for more information about infrastructure
- The justification for the phasing of sites pre and post 2016
- The weight given to the parish wide housing needs surveys
- The weight given to parish plans
- Have the DPDs properly considered the cumulative impact of proposed development in Blackawton, Dartington, Stoke Fleming, Stoke Gabriel and Stokenham and Chillington

Choice of Villages

- Question methodology of selected villages based on presence of a school and a shop

- Suggestions of alternative and more even distribution of housing numbers between the villages
- Suggest a more sophisticated approach to distributing the housing numbers amongst the villages which takes account of the increase in number of houses as a percentage of the current stock
- Question if a needs based distribution has been used, whether such an approach is correct, and whether it has been used correctly
- Whether a more localised justification for the housing numbers on each site is needed

Deliverability

- Whether the plan is sufficiently flexible
- Whether sufficient attention has been paid to viability
- The difficulties of meeting affordable housing targets in the current climate and precedents set by recent Development Control Committee decisions (to accept a lower AH %age)
- The need to allocate some less sustainable sites early on to ensure delivery
- Whether certainty over delivery has been given sufficient consideration in respect of some proposals
- Whether the phasing of identified sites is appropriate in all cases
- Whether viability information provided by developers is properly understood and used correctly
- Support for monitoring mechanisms and flexibility within the plan

Housing

- Levels and deliverability of affordable housing
- Transparency of housing targets
- Whether the plans' approach and allocations are the most appropriate and desirable way to address housing need
- Whether affordable and market housing will really be for local people
- Whether the number of housing units proposed should be more or less
- Whether the plan strikes the right balance between meeting need and protecting the environment
- Whether there is an over-reliance on market housing
- Whether the plan should do more to address issue of empty properties

Employment

- Whether the need for good jobs has been properly addressed
- Whether the approach to employment land should relate to the amount of land or the number of jobs
- Whether more policy guidance is needed on the type/nature of employment and commercial development that would be appropriate at each allocation
- Support for the approach to employment land

Other Issues

- Whether sufficient regard has been paid to the cumulative impact of these development on the rural local road network
- Whether the plan has had sufficient regard to the Habitats Directive
- Has due consideration been given to South Hams Special Area of Conservation and the Coastal Preservation Area
- Has sufficient weight been given to the Area of Outstanding Natural Beauty designation
- Has the impact of development on the Greater Horseshoe bat been properly considered
- Whether the plan has had sufficient regard to the issue of climate change
- Whether the plan has had sufficient regard to the issue of flooding
- Whether the plan has had sufficient regard to sustainable transport issues
- Questions about monitoring, especially with regards five year land supply

8. Settlement Specific Comments

Modbury

General Comments:

- Support need for high levels of new affordable housing in the town.
- Need for holistic masterplan for the town
- Need to redevelop the school
- Need to address traffic issues in the town in a comprehensive manner
- Support for need to provide more employment land in the town
- Scale of development and cumulative impact of both proposals
- Infrastructure capacity - school, health centre,
- Development will meet needs of Plymouth, not Modbury
- Need to protect green spaces
- Lack of employment locally
- More should be done to explore alternative means of providing affordable housing
- Impact on character of town
- Need to provide new community hall
- Need to provide housing for single occupancy, and support downsizing
- Need for local distinctiveness
- Should build 100% affordable housing only

Site Specific Comments:

Proposal RA1: West of Palm Cross Green, Modbury

- Impact of new development on road network
- Limit to 30 houses only
- Ensure housing is for local people and genuinely affordable
- Traffic concerns
- Loss of agricultural land
- Impact on countryside
- Better site available
- Topography
- Weight given to Village Design Statement and Parish Plan
- Questions evidence base in support of the site
- Scale of development
- Not well related to existing town
- Visual Impact
- Confirmation from owners of land for link road that their land is available to be used if required
- Need for more clarity/definition of proposals
- Impact on wildlife
- Impact on landscape character
- Unacceptable to develop the site unless high levels of affordable housing are achieved

Proposal RA2: South of Poundwell Street, Modbury

- Support for re-development of this site
- Impact on Grade I listed Church
- Questions evidence base in support of the site
- Scale of development
- Loss of car park
- Traffic impact

Alternative Site(s) Proposed:

- Land part of Old Traine Farm (Modbury STA site 2)
- Site at Galpin Street (Modbury STA Site 7) - landowner has confirmed it is available and deliverable
- Should use small brownfield and infill sites instead

Salcombe

General Comments:

- Confusion about the inclusion of houses at Bonfire Hill which have already been built and other houses with planning permission but not yet constructed
- Question the need to use greenfield land
- Question need for affordable housing in Salcombe
- Question weight given to parish level housing needs survey which found a need for 22 affordable homes for rent
- Confirmation that Beadon Farmhouse (Salcombe STA site 6) is not available for development
- Questions if housing will be affordable housing for local people or just become more second homes
- Suggest need to re-locate park and ride to north of site RA3

Proposal RA3: Bonfire Hill, Salcombe

Site Specific Comments:

- Question deliverability, particularly with regards topography
- Question reliance on market housing to deliver affordable particularly in this location
- Prominent location, poorly related to existing settlement
- Skyline development
- Landscape impact including long views
- Weight given to AONB
- Impact on tourism
- Design and landscape character
- Gateway locations
- Runoff issues
- Localised improvements to both the water distribution and sewerage networks may be necessary
- Clarity needed regarding houses already built
- Question evidence base in support of site
- Traffic impact
- Particular concern regarding inclusion of Batson Cross (north-western most field of site)

Proposal RA4: Shadycombe

- Need to address possible flooding issues carefully
- Localised improvements to both the water distribution and sewerage networks may be necessary

Alternative Site(s) Proposed:

- Batson Creek - land close to RA4 (Salcombe STA Sites 9 and 3)
- Gould Road Car Park (Salcombe STA Site 10)
- Ex-gas works site (Salcombe STA Site 7)

Stokenham & Chillington

General Comments:

- Cumulative impact of development in light if permissions granted for new houses in Chillington
- Concern about increase in traffic on A379 and locally
- Lack of infrastructure to support further housing
- Has due consideration been given to the impact of climate change, and particularly the loss of Slapton Line (road connection across Slapton Ley)
- Further clarity/explanation requested about the designation of Stokenham and Chillington as a joint Local Centre when they are very different and other policies seek to prevent their coalescence

Proposal RA5: Chillington Village Centre, Chillington

Site Specific Comments:

- Flooding Issues
- Localised improvements to both the water distribution and sewerage networks may be necessary
- Housing lost to second homes and holiday homes not affordable housing for local people
- Integration with village hall contributions required in RA6

Proposal RA6: South of Carehouse Cross, Stokenham

Site Specific Comments:

- Support for housing for locals in the village
- Scale of site
- Localised improvements to both the water distribution and sewerage networks may be necessary
- Questions whether there is a need for new development and is concerned that any new development will become holiday homes.
- Difficulty in providing safe pedestrian access
- Impact on AONB
- Better site elsewhere
- Visual Impact and landscape character
- Questions availability of site in its entirety

- Impact on neighbours, particularly on eastern part of the site
- Question need to use greenfield site in AONB
- Traffic and parking issues
- Lack of employment locally
- Scale and density
- Deliverability
- Better sites elsewhere
- Need to use infill
- Loss of agricultural land
- Lack of facilities in Stokenham
- Protected Coastal Zone
- Impact on wildlife
- Impact on village character and quality of life
- Question need for provision of village hall
- Impact on archaeology
- Pollution from new street lighting
- Impact on listed buildings
- Limit site boundary to western part only
- Question STA findings for this site
- Impact on trees and hedgerows
- Deliverability in terms of access to finance
- Landowner of western part of site confirms it is available and deliverable
- Deliverability of access path
- Justification for support of shop
- Integration with village hall contributions required in RA5
- Should be allocated as two separate sites with different requirements for each
- Run-off issues

Alternative Site(s) Proposed:

- Should use brownfield sites closer to Kingsbridge
- Should be re-using empty homes locally
- Should be to north and/or west of the village
- Should be a series of small development, not one large site

Yealmpton

General Comments:

- Localised improvements to water distribution and sewerage networks may be needed

Proposal RA7: North and east of Milizac Close, Yealmpton

Site Specific Comments:

- Development will enhance self containment of the village
- Extend site boundary to include additional land to the north to enable delivery of the required development

Proposal RA8: North of Riverford Farm Shop

Site Specific Comments:

- Support need to provide employment land

Aveton Gifford

General Comments:

- Support for affordable rented accommodation in the village as it is needed
- Support for village growth to sustain local services - school, pub and shop
- Questions affordability of new houses
- Need to retain housing for local people

Proposal RA9: Land north of village centre, Aveton Gifford

Site Specific Comments:

- Some support for the chosen site
- Viability issues with 50% targets of affordable housing and provision of infrastructure
- Small units needed
- Support for site if it will meet local need for employment
- Impact on AONB
- Impact on archaeology
- Access issues
- Environmental impact
- Impact on Wildlife
- Landscape and Visual Impact
- Traffic and parking issues
- Density and scale of development
- Impact on village character
- Infrastructure
- Run-off and flooding issues
- Need for street lighting
- Impact on neighbours

Alternative Site(s) Proposed:

- Millfield (Aveton Gifford STA Site 1) and Barnfield (directly above Millfield together would be preferable to RA9 (known locally as Millfield (STA Site 1) and Homefield (STA Site 2)

- Barnfield, a new site (directly above Aveton Gifford STA Site 1 which is locally referred to as Millfield) is a more suitable site and could provide housing employment, better access, better links to village centre and play/recreation area

Avonwick

General Comments:

- Unsustainable location due to lack of a range of services in the village

Proposal RA10: Site to West of Avonwick

Site Specific Comments:

- Some support for the site
- Possible flooding issues
- Impact on village character
- Impact on AONB
- Question need to use greenfield site
- The need for adequate infrastructure
- Loss of agricultural land
- Density
- Traffic impact
- Impact on energy use
- Questions STA assessment of the site
- Confirmation that site is available and deliverable now
- Suggestion that on site village hall provision is only one option

Blackawton

General Comments:

- Support for some development in the village, particularly affordable housing
- Question whether village is a sustainable location for new development
- Lack of infrastructure - schools, roads, public transport
- Water distribution and sewerage capacity issues
- Capacity of school
- Impact on parking in the village
- What weight has been given to parish level housing needs survey
- Suggestions that only 10-20 houses are needed
- Need for development to be mixed use
- Development could enable replacement school
- Need to upgrade village hall and play areas

Proposal RA11: Land south of Cheavstone Lea, Blackawton

Site Specific Comments:

- Some support of the site

Proposal RA12: Town Farm, Blackawton

Site Specific Comments:

- Some support for the site
- Scale and amount of development proposed
- Lack of evidence to justify site choice
- Impact on conservation area
- Development will meet a strategic, and not local need
- Visual impact
- Impact on village character and amenity
- Deliverability, particularly with regards infrastructure
- Impact on hedgerows
- Questions if delivery partners having signed up to this development
- Possible flooding issues

Alternative Site(s) proposed

- Owing to difficulty accessing village, and lack of employment, suggest housing should be located in Dartmouth
- Suggestion that brownfield site in Totnes should be used instead

Brixton

General Comments:

- Questions need for housing in the village in light of new community at Sherford

Proposal RA13: Land north east of Venn Farm, Brixton

Site Specific Comments:

- Size and scale of development
- Questions justification for inclusion of employment land

Alternative Site(s) Proposed:

- Land at Red Lion Hill (Blackawton STA Site 6) should be allocated by 2016, confirmation it is available and deliverable

Dartington

General Comments:

- Concern about level of development proposed in the parish, when considering cumulative impact with Totnes and Rural Areas DPD allocations
- Questions need to use greenfield sites
- Infrastructure capacity especially in terms of traffic
- Question what weight has been given to parish housing needs survey which indicated a need for only 15 affordable homes

Proposal RA14: Webbers Yard and Sawmills Field, Dartington

Site Specific Comments:

- Land owner confirms site is available for re-development
- Extend site boundary to include the whole of Sawmills Field
- Run-off issues

Alternative Site(s) Proposed:

- Suggest better sites would be Follaton Farm and Broomborough, Totnes

Diptford

General Comments:

- Water distribution and sewerage capacity issues
- Support need for affordable housing in the village
- Village is relatively isolated with limited facilities and employment opportunities
- Support for more housing to help sustain the school

Proposal RA15: Wheatpark, Diptford

Site Specific Comments:

- Traffic impact
- Impact on neighbouring properties
- Landowner of part of the site has confirmed that their land is available
- Design and density
- Whether housing will really meet the needs of the village
- Run-off issues

Alternative Site(s) Proposed:

- Landowner of STA site 2 confirms the land is available for consideration for future development.

Ermington

General Comments:

- Scale of development questioned, particularly in relation to amount going to towns like Salcombe
- Water distribution and sewerage capacity issues
- Traffic and road capacity issues
- Parking issues

Proposal RA16: Land west of Ermington Workshops, Ermington

Site Specific Comments:

- Need for affordable housing recognised
- Questions scale of development
- Question need for additional employment land, need for village/community centre instead
- Question provision of a shop
- Flooding issues

Harbertonford

General Comments:

- Only need 10 houses
- Inadequate public transport
- Questions if village is sustainable location for this level of housing
- Lack of employment locally
- Harbertonford already has higher level of affordable housing than nearby villages
- Will not meet needs of village, but needs of Totnes
- What evidence supports the assessment of the longer term needs of the village

Proposal RA17: Harbertonford Mills, Harbertonford

Site Specific Comments:

- Questions if site is large enough to accommodate 10 dwellings
- Support for need to reuse the mill building
- Requests to deliver site by 2016

Proposal RA18: Land to north of village, Harbertonford

Site Specific Comments:

- Flooding and run off issues
- Scale of development
- Design and density
- Viability
- Loss of agricultural land
- Access issues
- Infrastructure issues
- Environmental impact
- Impact on biodiversity
- Impact on village character
- Loss of petrol station
- Parking issues
- Difficulties of providing safe pedestrian access
- Confirmation from land owner of part of site that their land is available
- Confirmation from other landowner that land may be available but requested boundary is extended

Alternative Site(s) Proposed:

- East of Tristford Road, Harberton for approx 9 houses in addition and/or in place of site RA10 Harbertonford

Holbeton

General Comments:

- Village has already accommodated new development
- Any new housing should be 3 bedroom family homes with gardens

Proposal RA19: Land north of Church Hill, Holbeton

Site Specific Comments:

- Impact on Grade 1 Listed Church
- Sensitivity of site and need for good design
- Run-off issues

Alternative Site(s) Proposed

- Next to Orchard Cottages (to the east of the village)
- Battisborough Cross (near Nethercombe and the Flete Estate)

Kingswear

General Comments:

- Support the need for some development in the village, including affordable housing
- Question suitability of Kingswear for additional development
- Lack of facilities for secondary age children
- Impact on tourism industry
- Question affordable housing targets
- Need to use greenfield site
- Question what evidence supports 10 houses in Kingswear

Proposal RA20: Land at Brixham Road, Kingswear

Site Specific Comments:

- Some support for the site, particularly as it is infill development
- Question STA assessment of the site
- Questions evidence base in relation to this site
- Lack of support from villagers for this site, they favour alternative(s)
- Question affordable housing viability and long term protection
- Deliverability, particularly as the site is very steep
- High development costs will make houses unaffordable
- Housing will be too expensive for local people
- Perceived over-development of the site
- Impact on AONB
- Visual Impact
- Design and layout
- Impact on village character
- Impact on neighbouring residents
- Impact on wildlife
- Impact on trees and hedgerows
- Loss of wood and impact on ecology
- Traffic impact
- Access and parking issues
- Previous history of planning refusals in the area
- Risk of flooding, erosion and subsidence
- Drainage issues
- Sewerage Capacity
- Precedent issues
- Site location makes it unsuitable for utilising solar energy

Alternative Site(s) Proposed

- Site known locally as 'Wilful Murder' (North East of 90 degree bend on Higher Contour Road)
- Waterhead Brake (Kingswear STA Site 1)

- Numbers proposed in Kingswear should be included within new development recently permitted at Noss on Dart
- Flat area at Cemetery Corner along from Waterhead Creek (north of Kingswear STA Site 1)
- Should be in Dartmouth where facilities exist

Loddiswell

General Comments:

- Loddiswell is a sustainable village which can accommodate additional development

Proposal RA21: Land north of village, Loddiswell

Site Specific Comments:

- Impact on Grade 1 Listed Church
- Sensitivity of site and need for good design
- Extensive work indicates that there are no alternative sites in Loddiswell
- Landowner/developer confirm site is available and deliverable
- Development on east and north of site would be detached and unrelated to the settlement pattern
- Loss of agricultural land
- Impact on village character, including distant views
- Question if strategic landscape will really mitigate the impact of development
- Impact on AONB, and weight given to the designation in making site section choices
- Design
- Impact on landscape character
- Questions if whole of site is required
- Potential run-off issues

Marldon

General Comments:

- Questions delivery of affordable housing
- Development not in response to village needs
- Capacity of village infrastructure
- Village already grown considerably in recent years
- Question need for football pitch and location of it
- Question the need for employment land, and locating it close to housing
- Keep employment uses separate from housing
- Impact on local services

Proposal RA22: Land at Fives Lane, adjacent to Vicarage Road, Marldon

Site Specific Comments:

- Impact on Area of Great Landscape Value
- Need to maintain 'green wedge' between Marldon and Torbay
- Use of greenfield land
- Drainage issues
- Landscape Impact
- Loss of Agricultural Land
- Impact on biodiversity
- Impact/Loss of Wetland. Wetland unsuitable for development
- Meeting local needs
- Need for ecological surveys, such as bats and orchids
- SSSI
- Impact on identity of Marldon as distinct from Torbay
- Trees
- Traffic impact
- Scale of development
- Previous planning history
- Difficulties of providing safe pedestrian access

Alternative Site(s) Proposed:

- Land south of Neller Copse (Marldon STA Site 11)
- Land North of Kiln Road (Marldon STA Site 13)
- Westerland Green (Marldon STA Site 2)

Stoke Fleming

General Comments:

- Support need for more housing in the village
- Support for development that will provide jobs and affordable housing
- Question weight given to parish level housing need survey which showed a need for 15 dwellings
- Lack of community support for sites
- Impact of current economic climate
- Question need for industrial units
- Lack of employment in immediate area
- Cumulative impact of both proposals
- Question capacity of village infrastructure, services and public transport
- Need to consider inter-relationship with Dartmouth

Site Specific Comments:

Proposal RA23: Land opposite Primary School, Stoke Fleming

- Support for the site as it performs well in terms of sustainability
- Support for site as it performed well in SA and has good transport links along A379
- Need to consider potential impact of severance of A379 at Slapton
- Landowner has confirmed that site is available and deliverable immediately
- Concern about traffic impact

Proposal RA24: Land south of Primary School, Stoke Fleming

- Scale of development
- Traffic impact
- Support for site as it performed well in SA and has good transport links along A379
- Need to consider potential impact of severance of A379 at Slapton
- Support for site as it is well located close to school with good access to facilities
- Owner confirms site is available and deliverable
- Impact on AONB
- Impact on landscape and distant views
- Design and layout
- Suggestion that an alternative site above RA23

Alternative Site(s) Proposed:

- Field to north of RA23, landowner confirms availability of site for development.

Stoke Gabriel

General Comments:

- Question level and distribution of development for Stoke Gabriel in relation to other villages in the rural areas
- Cumulative impact of the level of development proposed for the village particularly the impact on traffic and travel and the character of the village
- Does the plan need to do more to support rural diversification, provision of good jobs and relationship of local job market to Torbay and Teignbridge
- Concerns that the village is not sustainable, due to its lack of services
- Concern that proposals do nothing to reduce the need to travel
- Concerns that village is not accessible, public transport is infrequent and inconvenient and access by Devon lanes is difficult
- Concerns about impact on tourism

- Proposals contrary to views of most residents as set out in the Parish Plan
- Inadequate infrastructure to support further development
- Village does not need further development
- Lack of employment opportunities in village
- Brownfield sites should be considered before greenfield sites
- Impact on AONB and Coastal Protection Zone
- Impact on biodiversity, including Horseshoe bats and Devon banks
- Loss of agricultural land
- Questions whether the homes will really be for local village people and the deliverability of AH targets
- What weight has been given to Parish Housing Needs survey which found a need for 19 homes
- What weight has been given to findings of the Stoke Gabriel Parish Plan 2008
- Concern that the recent development of 9 houses at Gabriel Court has not been included in the overall housing numbers

Site Specific Comments:

Proposal RA25: Land opposite Rowes Farm, Stoke Gabriel

- Question relationship with planning application for Rowes Farm (51/1449/09/F) and objections submitted on that application
- Traffic impact
- Infrastructure, local services and facilities inadequate to support development
- Scale disproportionate to size of village
- Impact on AONB
- Impact on biodiversity including Horseshoe bats
- Site not accessible
- Contrary to DRA as cannot create street frontage without removing hedgerows destroying character of village
- Density and impact on surrounding properties
- Development not in keeping with rest of village
- Site not suitable to accommodate a mix of uses
- Site too far from village centre
- Concern about STA assessment for this site

Proposal RA26: Land at Paignton Road, Stoke Gabriel

- Question employment element of proposal, should be deleted
- Scale of development
- Density and impact on surrounding properties
- Site too far from village centre
- Traffic impact
- Impact on AONB

- Impact on biodiversity including Horseshoe bats and loss of Devon bank
- Lack of public transport and accessibility
- Site not suitable to accommodate a mix of uses
- Concern about STA assessment for this site

Proposal RA27: Land south of Coombe Shute, Stoke Gabriel

- Flood risk
- Contamination
- Land owners confirm that site is available and deliverable before 2016
- Concern about STA assessment for this site

Thurlestone

General Comments:

- Concerns any new housing in village will just become second homes
- Support for small scale affordable housing scheme for local people
- Capacity of road network
- Capacity of school

Proposal RA28: Land east of Seaview, Thurlestone

Site Specific Comments:

- Scale of development
- Will housing really be affordable to local people
- Run-off issues
- Landowner has confirmed that the site is not available for development.

Ugborough

General Comments:

- Support for some development in village
- Some development needed before 2016
- Village too small to allocate more housing
- Any development would exacerbate existing parking issues
- Lack of public transport
- Village currently has lack of community space and inadequate facilities
- Need for playing field provision

Proposal RA29: Land east of Primary School

Site Specific Comments:

- Traffic and congestion issues
- Infrastructure issues
- Access issues
- Flooding issues
- Drainage concerns
- Scale and Density
- Impact on conservation area
- Question if housing will be for local people
- Need to require local connection
- Need to provide play space
- Concerns about deliverability
- Suggestion that a CLT should be used
- Suggestion site should be used for community use/open space/parking not housing
- Request to extend boundary to allow for proper vehicular access, community facilities and residential development.
- History of planning refusals

Alternative Site(s) Proposed

- Other sites around the village
- Workhouse Field
- Development should be in Ivybridge

Wembury

General Comments:

- Inadequate public transport links to Plymouth
- Narrow road access to the village
- Lack of facilities for teenagers
- Already increased pressure from tourists
- Impact of Sherford new community, additional pressure on Wembury
- Wembury does not link functionally with Yealmpton
- Already had lots of new development
- School capacity
- Recent development at Staddiscombe and the proposed Sherford development, and whether any development is needed in Wembury.
- Question site selection in light of findings of STA in Wembury
- Need to include additional site in Wembury for delivery post 2016
- More flexibility is needed - allocate more sites

Proposal RA30: Land south of Knighton Road, Wembury

Site Specific Comments:

- Deliverability
- STA constraints not addressed
- Run off issues
- Impact on wildlife
- Access issues
- Visual impact
- Environmental impact
- Traffic and travel impact
- Impact on AONB
- Sewerage and water supply
- Question need to build on greenfield site
- Loss of agricultural land
- Impact on village character
- Loss of right of way
- Loss of hedgerow
- Difficulty achieve safe pedestrian access
- Better site within the village and elsewhere
- Impact on tourism
- Outside development boundary
- Need for traffic calming
- Viability concerns
- Should be an exception site
- Coastal Protection Area
- Previous site refused planning
- Need to deliver 60% affordable housing to justify using the site
- Need to consider needs of older people
- Some conditional support for the site chosen
- Site(s) at Leyford Close (STA 3 and 4) should be used before this site

Alternative Site(s) Proposed:

- Wembury STA Site 3
- Wembury STA Site 4
- Should be in Plymouth or at Sherford new community

9. Omissions

Dartington Estate

- Non-inclusion of sites within the Dartington Estate for housing
 - South of Broom Park, Week
 - Ashmoor Field, Dartington
 - Droridge Lane, Dartington

- Staples Field
- Non-inclusion of sites within the Dartington Estate for housing and or employment:
 - Huxhams Cross/Woodland Fields
- Non-inclusion of a specific allocation for the Abundant Life project (extra care housing and associated facilities) at Foxhole, Dartington
- Review of Dartington Special Policy Area to:
 - extend boundary to north and west
 - review policy for Cider Press Centre
 - remove protection at Hunters Moon and Hunters Moon House

Down Thomas

- Non-inclusion of Lee Mill as a village for an allocation
- Allocate land at Renney Road

Lee Mill

- Non-inclusion of Lee Mill as a village for an allocation
- Allocate land at Harris Way/Bottle Park

Harberton

- Non inclusion of Harberton as a village for an allocation
- Allocate land at East of Tristford Road for approx 9 houses

Newton Ferrers

- Non inclusion of Newton Ferrers as a village for an allocation
- Allocate land at Briar Hill Campsite (Newton Ferrers STA Site 1)

Rattery

- Non inclusion of Rattery as a village for an allocation
- Allocate land to west of village
- The site is available and deliverable within the next five years
- It could accommodate 12-15 dwellings

West Alvington

- Non inclusion of West Alvington as a village for an allocation
- Allocate site of 0.7 ha on eastern edge of village (by Ring 'O' Bells) (previously RA35)
- The site is currently available and deliverable
- It could accommodate 20 dwellings