



**South Hams
District Council**

**South Hams Local Development Framework
Totnes Site Allocations Development Plan Document
Statement of Representations – Regulation 30
July 2010**

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1. This Statement accompanies the Submission of the Totnes 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. An annex to this statement sets out a more detailed summary of these representations
3. The publication stage for the Totnes 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.
4. A total of 106 bodies (including a Joint Community Response which represents the views of 22 groups) and individuals responded to the consultation and raised 551 representations on this DPD (including 4 late responses raising 15 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, Deliverability, Housing, Employment and Other Issues.
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
 - Explanation of the reasoning between changing format of document from Totnes and Dartington DPD to Site Allocations DPD
 - 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 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 Core Strategy should have been reviewed before progressing Site Allocation DPDs

7. Issues about General Development Approach

General Approach:

- Level of growth and compliance with the Core Strategy (and RSS) 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
- Whether the housing numbers should be increased to reflect the non-delivery at Sherford
- If 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/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 (Town Centre Zones and Core Zones, the Dartington Special Policy Area, playing field protection policies, employment land protection policies, 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

Vision and Objectives

- Whether the vision is achievable and deliverable
- Whether a new bridge across the river is deliverable and if it should be included in the vision diagram
- 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.
- Whether objectives on social and economic infrastructure, transport and green infrastructure and open space should be included

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 if 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).
- Whether the infrastructure issues in Totnes have or can be resolved, particularly with regards to roads, parking, school places and sewerage
- 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 a traffic study and information to support a bypass
- 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 survey for Dartington which found a need for (only) 15 affordable units
- Have the DPDs properly considered the cumulative impact of proposed development in the Totnes DPD and the Rural Areas DPD on the parish/village of Dartington

Deliverability

- Concern about lack of long term masterplan for the town with real commitment to delivery
- Whether the plan is sufficiently flexible
- Uncertainty over new library for Totnes, Devon County Council has mooted the idea of a community hub at Rushbrook (Totnes Hospital site)
- 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

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 be more explicit in its support for community ownership and management especially self build, co-housing, co-ops, Community Land Trusts and mutual home ownership models
- Whether the plan should do more to address the issue of empty homes
- Whether the plan does enough to promote densification
- Whether the plan does enough to promote retro-fitting

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

Other Issues

- Whether the plan has properly considered traffic issues, and in particular the cumulative traffic and parking impacts of the developments proposed, both on the town and in the surrounding areas
- Suggested need for a bypass
- Whether the need to develop in a sustainable and resilient way has been properly addressed
- Whether the plan sufficiently reflects the community's vision for Totnes, and its desire to be an exemplar community in terms of addressing climate change and peak oil issues
- Whether the plan gives sufficient weight to heritage issues
- Whether the plan gives sufficient attention/support to the independent retail character
- 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 sufficient emphasis been given to address the recognised deficit in playing pitches, and issues of open space overall

- Has the impact of development on the Greater Horseshoe bat, particularly the flight routes along the river corridor, 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
- The need to include allotments on each site
- Whether the plan makes the most of the community's desire for Totnes to become an exemplar of sustainable development in a historic town

Proposal T1: Baltic Wharf

- Deliverability and viability - should housing numbers be higher for viability reasons
- Deliverability and viability- should housing numbers be lower to reflect nature of site, landscape and traffic constraints and to ensure employment uses are protected
- The possibility of over-development in terms of housing numbers in order to secure delivery
- Transport issues
- Access constraints
- Possible sterilisation of access through the site by development
- Limit quayside development to secure marine and riverside access
- Impact on environment
- Sewerage discharge capacity
- Need to safeguard marine employment and activity
- Impact on existing businesses including the long term viability of the boatyard if its area is reduced
- Loss of protected employment land
- Need to restrict affordable housing for local people
- Impact on Historic Park and Garden (Sharpham Estate)
- Need to increase the number of jobs in boatyard
- Density
- Is the mass of development, particularly its height, appropriate to the surrounding area
- Adequacy of the evidence base that supports the proposal
- Delivery of affordable housing
- Need for allotments
- Appropriateness of including a care home
- Need for sympathetic design
- Impact on the River Dart
- The need to have a firm boundary to the development
- Any increase in the number of houses should corresponded with a reduction in number elsewhere

8. Proposal T2: KEVICC

- Scale of development
- Loss of green space and playing fields, and the robustness of the supporting evidence
- Question the justification for the proposal
- Access issues
- Justification and desirability of relocating the Grove School
- Deliverability, including the need to divert water mains and sewers running through the site
- Traffic and the cumulative impact of traffic
- Further explanation of contribution to A385 corridor plan needed
- Impact on Air Quality Management Area
- Further clarification needed on how the necessary infrastructure will be delivered and by whom.
- Further indication needed on the scope of the masterplan and who will prepare it.
- Impact on water environment and biodiversity
- Impact on wildlife corridor especially the bat flight path
- Flooding and the evidence base on this issue
- Suggestion to put The Grove Primary School on lower site and having remainder of site for housing
- Clarity/uncertainty on how infrastructure requirements will be delivered.
- Delivery of affordable housing
- Need to include allotments
- Concerns about access to Sheepfield part of the site
- Suggestions that the site should be considered as part of a plan for a wider area stretching from Babbage Road Industrial estate through to KEVICC, including the railway station and the Dairy Crest site

9. Proposal T3: Totnes Central Area

- Parking- levels to be provided and loss of current spaces
- Loss of green area
- Traffic
- Loss of civic/ community space
- The principle of housing on this site
- The re-use of The Grove school site once it has been relocated - suggestions include retain the area currently used as the school's playing field as play space for children and adults and/or open space and/or a youth centre
- Design issues
- Need to include 20 houses on the market square, or not
- Retrofit existing hall not redevelop
- The need for better integration between the southern and central areas of Totnes
- Concern about disruption to market during construction
- Need to ensure no loss of market trading area
- Deliverability of affordable housing

- The need for allotment provision to be included
- Concern about the Southern Area part of the proposal in respect of a lack of consultation and how it fits into previous plans and discussions
- The need for a strategic masterplan to include this area as part of a wider central area plan
- The importance of retention of open market space for its contribution to townscape of Totnes
- Concerns about deliverability of new library as Devon County Council mooted the idea of a community hub including a new library (but not youth centre) at Rushbrook (Totnes Hospital site)

10. Proposal T4: Dairy Crest

- Deliverability/Feasibility of plan
- Need for further work particularly an infrastructure and traffic plan
- Inclusion of the main factory building within the site
- Extend site boundary to include the area north of the leat
- Delivery of affordable housing
- Viability/ number of homes - more needed for viability reasons
- Need for allotments
- Role of site as transport hub for Totnes
- Support employment
- Need to develop the site in a comprehensive manner
- The justification/validity of including a criteria relating to number of jobs
- Flooding information is incorrect
- Suggestion to use this site to relocate Council Offices, for reason of accessibility by rail and bus, thereby freeing up the site at Follaton House for development

11. Proposal T5: Land at Dartington Lane

- Flooding
- Traffic
- Inclusion of provision for employment land
- Impact on Area of Great Landscape Value
- Infrastructure
- Impact on wildlife and trees
- Impact on nearby listed building (Dartington Lodge)
- Impact on the setting of the Dartington Estate
- Impact on Air Quality Management Area
- Number of houses
- Need for employment land, and level requested, already an oversupply of large office space
- Need to plan in conjunction with T6 through a joint masterplan
- Level of developer contributions required
- Benefits of providing pedestrian and cycle links on site, rather than as a contribution
- Delivery of affordable housing

- Need for allotments
- Concerns about coalescence between Totnes and Dartington
- Impact on gateway to town
- Effectiveness of strategic landscaping
- Relocate employment provision to Dartington
- Better alternative sites are available

12. Proposal T6: Land at Ashburton Road

- Scale of development
- Flooding issues
- Deliverability of scheme
- Level of developer contributions
- Delivery of affordable housing
- Need for, and level of employment land on this site, is there already an oversupply
- Loss of green area
- Traffic
- Landscape impact
- Visual and environmental impact
- Impact on wildlife
- Loss of amenity through noise, light and pollution
- Concerns about coalescence between Totnes and Dartington
- Impact on Air Quality Management Area
- Inclusion of community uses (Kingdom Hall)
- Need to plan in conjunction with T5 through joint masterplan
- Benefits of providing pedestrian and cycle links on site, rather than as a contribution
- Need for Allotments
- The importance of this gateway site
- Impact on setting of Dartington estate
- Better alternative sites are available

13. Proposal T7: Riverside

- Impact on environment
- Traffic
- Include allotments
- Concerns about overdevelopment of the site
- Delivery of affordable housing
- Need for Allotments
- Size and scale of development
- Impact on the river scene
- Need for high density
- Flooding issues
- Sewerage Network capacity for discharge
- Impact on Coastal Preservation Area, Area of Great Landscape Value and countryside

- Suggestion to build only on the lower part of hill
- Suggestion to include Steamer Quay (STA Site 1) and develop together

14. Proposal T8: Borough Park

- The principle of housing on this site
- Deliverability/feasibility of plan
- Loss of playing fields
- Compliance with PPG17
- Loss of civic/ community space
- Design
- Traffic
- Delivery of affordable housing
- Need for allotments
- Need to retain variety of community/sports uses on the site and whether this would be compromised by development
- Suggestion to enlarge the site boundary to include Totnes Pavilion-redevelop as a whole with commitment to retain existing open space/sport use
- Question the need to specify a certain number of units, suggest an alternative approach of saying as much as viable

15. Proposal T9: Bourton Lane

- Deliverability
- Number of units, in view of site constraints
- Viability, in light on steepness of the site
- Density and design
- Delivery of affordable housing
- Will housing really meet local need
- Need to use green field land is questioned
- Visual impact
- Impact on trees
- Area character
- Traffic infrastructure and the need for a traffic plan
- Need for Allotments
- Effectiveness of current play space
- Development pressure on nearby areas as a result of jumping the strategic gap
- Impact on AQMA

16. Alternative Approaches

- Greater focus on Bridgetown
- Focus development away from AQMA

- Do not focus on PDL and town centre as need to spread development to deliver suitable housing mix and avoid damaging the integrity of the town
- Concentrate development in new eco village at Bourton Lane
- Upgrade Babbage Road Industrial Estate before using green fields for new employment
- Allocate Great Court Farm instead of T8 and T9 phased for delivery pre-2016

17. Alternatives Sites Suggested

- Barracks Hill (Site 23 in STA)
- Puddavine (Site 24 in STA)
- Spring House (south of Puddavine Residential Home) as part of revised boundary to T2
- Winslade House Farm (Sites 20 and 21 in STA)
- Follaton Farm (Site 19 in STA, subject to current discussions about development) for housing and/or mixed use
- Bourton Lane as an eco village
- Follaton House (Site 3 in the STA) for housing and/or mixed use
- Broomborough (Site 17 in STA)
- Babbage Road industrial estate (Site 30 in STA),
- Follaton Bungalows (Site 18 in STA)
- Great Court Farm (Site 13 in STA) and Blackpost Lane (Site 12 in STA) in place of site T8 and T9
- Z-shaped field at Puddavine if KEVICC proposal does not come forward
- Land at Copland Lane (STA sites 21 and 22)