

**SOUTH HAMS  
LOCAL DEVELOPMENT  
FRAMEWORK**

**SITE ALLOCATIONS  
DEVELOPMENT PLAN DOCUMENTS**

**INDEPENDENT EXAMINATION**

**MATTERS AND ISSUES FOR THE  
EXAMINATION**

**Version 2**

**27 OCTOBER 2010**

**Note 1: It is implicit that in answering the following questions, if respondents identify a deficiency in the submitted DPDs they should make clear how the DPDs should be changed.**

**Note 2: Proposal/Policy references in brackets are to the principal proposals/policies/text but other sections of the DPD in question may also be relevant. Respondent Numbers are prefaced by SA (for example, SA 0717 for Dartington Hall Estate)**

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**Tuesday 2 November**

## **Matter 1a – Basis for the Overall Approach of the DPDs**

### **Issues**

- 1.1 Overall, have the DPDs been prepared in accordance with the legal requirements and the advice in Planning Policy Statement 12?
- 1.2 Do the DPDs have regard to national policy and if there are any divergences how are these justified?
- 1.3 Have the DPDs been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the 2004 Regulations (as amended)? Overall, do they reflect community views?
- 1.4 Having regard to the scope of the other DPDs that have already been adopted and the Council's intentions as set out in the Local Development Scheme July 2010, are there any obvious omissions, in terms of policy guidance, from the Site Allocations DPDs?
- 1.5 Are the DPDs based on a sound process of sustainability appraisal, testing of reasonable alternatives, and do they represent the most appropriate strategy in the circumstances?
- 1.6 Has the site selection process been objective and based on appropriate criteria? Is there a clear audit trail? Were any changes made to the selection criteria or their weighting during the process and if so how was this justified?

## **Matter 1b – Overview of the Allocations**

### **Issues**

- 1.7 In broad terms, does the scale, type and distribution of the allocated land contribute to maintaining a *sustainable* pattern of development in the district? Does it take proper account of circumstances and strategies beyond the district's boundaries?
- 1.8 Are the allocations consistent with the Core Strategy including its vision and strategy for the settlements and target for housing development on brownfield land?
- 1.9
  - i) Is the quantum of development proposed for housing and employment properly justified, including for the post 2016 period?
  - ii) In broad terms is it deliverable?
  - iii) What are the implications for maintaining a continuous supply of housing land for a five-year period and for the medium and longer-term supply?
- 1.10 Will the allocations provide for an appropriate mix of housing and in the right locations?
- 1.11 Is the target for affordable housing justified and reasonably likely to be achieved? Is it consistent with the other documents in the Council's Local Development Framework?
- 1.12 Should more detail be included about how the proposed allocations will help to address climate change?
- 1.13 Are the allocations based on a sound assessment of infrastructure requirements and their deliverability, including expected sources of funding?
- 1.14 Overall, do the DPDs deal adequately with uncertainty? Is sufficient consideration given to monitoring and triggers for review?
- 1.15 In broad terms is there consistency with the Development Policies DPD?

## **Wednesday 3 November – morning**

### **Matter 7e: Rural Areas**

#### **Blackawton : south of Cheavestone Lea (RA11) and Town Farm (RA12)**

- 7e.1 What is the evidence of housing need in the village?
- 7e.2 Are the existing infrastructure and services adequate to cater for the proposed growth?
- 7e.3 Do sites RA11 or RA12 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Trench Furze Cross (SA 0492) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

#### **Marldon : Five Lanes (RA22)**

- 7e.4 Can appropriate measures be introduced to ensure that the landscape value of the area is not significantly compromised?
- 7e.5 Has the Council attached appropriate weight to the risk of coalescence with Paignton?
- 7e.6 Has the Council attached appropriate weight to flood risk?
- 7e.7 Has the Council attached appropriate weight to agricultural land value?
- 7e.8 Is the existing infrastructure capacity adequate to meet the needs of the proposed development?
- 7e.9 What is the evidence of need for housing and employment land in the village?
- 7e.10 Is there sufficient evidence to demonstrate that the proposed development, including the football pitch, could be delivered?
- 7e.11 Has the availability of brownfield sites in the village been adequately explored?
- 7e.12 Does site RA22 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Westerland Green (SA 0763) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

## **Rattery Non Allocated Site**

7e.13 Do any of the allocated sites fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed on land at Rattery (SA 0717) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

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## **Wednesday 3 November – afternoon**

### **Matter 7f: Rural Areas**

#### **Modbury : west of Palm Cross Green (RA1) and south of Poundwell Street (RA2)**

7f.1 Is there any justification for increasing the proportion of affordable housing?

7f.2 Does site RA1 fail to meet any of the tests of soundness? If there is a need to identify additional land, are there alternative infill sites in the village which are appropriate and deliverable? Have they been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

#### **Brixton : north east of Venn Farm (RA13)**

7f.3 What is the evidence of housing need in the village?

7f.4 Does site RA13 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Red Lion Hill (SA 0763) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

#### **Down Thomas**

7f.5 What evidence is there that Down Thomas is a sustainable location within which to accommodate development?

7f.6 Do any of the allocated sites fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Renney Road (SA 0590) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

## **Thursday 4 November morning**

### **Matter 2c: Totnes Proposals T1 (Baltic Wharf), T7 (Riverside), T8 (Borough Park), T9 (Bourton Lane); Alternative Proposals at Lower Bourton Valley (SA 0796), Great Court Farm (SA 0763, SA0 718) and Blackpost Lane (SA 0718)**

#### **Issues**

- 2c.1 Overall, are the allocated sites appropriate, feasible and deliverable, having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
  - 2c.2 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed? Is the extent of the sites correctly defined?
  - 2c.3 With regard to Proposal T1, have riverside employment interests been properly considered?
  - 2c.4 With regard to Proposal T8, have the implications for recreational open space been properly considered in the light of national planning policy and other factors?
  - 2c.5 With regard to Proposal T9, are there particular difficulties about access to the site?
  - 2c.6 If there is a need to identify additional land, are the alternative proposals for the Lower Bourton Valley, Great Court Farm and Blackpost Lane appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?
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## **Thursday 4 November afternoon**

### **Matter 3: Ivybridge Proposals I1 (East of Ivybridge) and I2 (Ivybridge Central Area); Alternative Proposal at Lee Mill (SA 0590)**

#### **Issues**

- 3.1 Overall, are the allocated sites appropriate, feasible and deliverable, having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
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- 3.2 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed? Is the extent of the sites correctly defined?
- 3.3 With regard to Proposal I1, is the reference in paragraph 6.17 to a new junction on the A38 justified and is it likely to be deliverable? Is there sufficient clarity about how the proposal relates to the existing sports facilities and recreational interests, including the rugby club grounds?
- 3.5 If there is a need to identify additional land, is the alternative proposal for Lee Mill appropriate and deliverable? Has it been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

## **Friday 5 November morning (9.30 start)**

### **Matter 2a – Totnes Proposals T3 (Totnes Central Area) and T4 (Dairy Crest); Alternative Proposals at Follaton Farm, Follaton House, Follaton Bungalows and Broomborough (SA 0718)**

#### **Issues**

- 2a.1 Overall, are these allocated sites appropriate, feasible and deliverable, having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
- 2a.2 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed? Is the extent of the sites correctly defined?
- 2a.3 With regard to Proposal T3:-
- i) should more information be provided about the amount of retail, commercial and office uses that would be appropriate on the Market Square and Civic Hall area?
  - ii) is there a need for more information about the proposed access, circulation and parking arrangements and the balance that should be struck between parking and other uses?
  - iii) is the proposed re-location of The Grove primary school justified? How would it affect walking to school and the balance of outdoor recreation space in the central area?
- 2a.4 With regard to Proposal T4:-
- i) is the extent of the flood risk properly reflected in the proposal?
  - ii) should more be said about the scope for improved connectivity, including with Proposal T2?
- 2a.5 If there is a need to identify additional land, are the alternative proposals at Follaton Farm, Follaton House, Follaton Bungalows and Broomborough appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?
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## Friday 5 November afternoon

### **Matter 2b Totnes Proposals T2 (KEVICC), T5 (Land at Dartington Lane), T6 (Land at Ashburton Road); Dartington Proposal RA14 (Webbers Yard and Sawmills Field); Alternative Proposals at Puddavine and Barracks Hill (SA 0717, SA 0174)**

#### **Issues**

- 2b.1 Overall, are the allocated sites appropriate, feasible and deliverable, having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
- 2b.2 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed? Is the extent of the sites correctly defined?
- 2b.3 With regard to Proposal T2, have the implications for recreational open space been properly considered in the light of national planning policy and other factors?
- 2b.4 With regard to Proposals T5 and T6, would the effects on settlement form be acceptable?
- 2b.5 Has the cumulative impact of the allocations for Totnes and the Rural Areas on Dartington been properly considered? Is the quantum of development in Proposal RA14 properly justified?
- 2b.6 If there is a need to identify additional land, are the alternative sites at Puddavine and Barracks Hill appropriate and deliverable? Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

## **Tuesday 9 November - morning**

### **Matter 4a: Kingsbridge Proposals**

#### **General Issues for each proposed site**

- 4a.1 Overall, are the allocated sites appropriate, feasible and deliverable, having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
- 4a.2 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed? Is the extent of each site correctly defined?

#### **North West (K1)**

- 4a.3 Does site K1 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Woodhouse Farm (SA 0719) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

#### **West Alvington Hill (K5)**

- 4a.4 Bearing in mind the topography of the site can a cycle route and play provision be satisfactorily accommodated?
- 4a.5 Would the proposed development have a significantly harmful impact on the living conditions of neighbours?

#### **The Quayside (K2)**

- 4a.6 Has the Council attached appropriate weight to flood risk?
- 4a.7 Does site K2 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Woodhouse Farm (SA 0719) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

### **Union Road Area (K3)**

- 4a.8 Has the Council attached appropriate weight to flood risk?
- 4a.9 Does site K3 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Woodhouse Farm (SA 0719) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

### **Garden Mill Area (K4)**

- 4a.10 Has the Council attached appropriate weight to flood risk?
- 4a.11 Does site K4 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at Woodhouse Farm (SA 0719) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?
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## **Tuesday 9 November - afternoon**

### **Matter 4b: Kingsbridge Proposals (continued)**

#### **Leigh Cross (K6)**

- 4b.1 On what evidence of need is this allocation based?
- 4b.2 Could 'strategic landscaping' as referred to in K6 sufficiently mitigate the impact of the proposed development on the AONB?
- 4b.3 Have the implications of increased traffic been satisfactorily addressed?
- 4b.4 Would it be possible to achieve a satisfactory relationship between the site and Kingsbridge?
- 4b.5 What would be the impact of the proposal on the viability of the farm?
- 4b.6 What would be the impact of the proposal on the nearby residential and touring caravan sites ?
- 4b.7 What alternative employment sites have been assessed and why were they dismissed?
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## **Matter 5: Rural – General**

- 5a What is the Council's approach to waste management in the rural areas, with particular regard to policies WPP1, 2 and 3 of the Devon Waste Local Plan?

## **Matter 7g: Rural Areas**

### **Avonwick (RA10)**

- 7g.1 What are the sustainability credentials of Avonwick? Do they make the village an appropriate location for growth?
- 7g.2 Could landscaping sufficiently mitigate the impact of the proposed development on the AONB?

### **Stoke Fleming (RA23 and RA24)**

- 7g.3 What are the sustainability credentials of Stoke Fleming? Do they make the village an appropriate location for growth?
- 7g.4 How will the necessary infrastructure improvements be delivered?
- 7g.5 Have issues of highway safety been satisfactorily addressed?

## **Wednesday 10 November - morning**

### **Matter 6: Dartmouth and Kingswear Proposals**

#### **General issues for each proposal**

- 6.1 Overall, are the allocated sites appropriate, feasible and deliverable, having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
- 6.2 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed?

#### **Dartmouth : Townstal (D1)**

- 6.3 What evidence is there of a need for retail, health and community facilities and how will the provision of such infrastructure be ensured?
- 6.4 How will better linkages between the site and the town be achieved?
- 6.5 What is the timetable for the preparation of the masterplan?

#### **Kingswear : Brixham Road (RA20)**

- 6.6 Bearing in mind the topography of the site is it possible to satisfactorily mitigate the visual impact of the proposal?
- 6.7 Have issues of highway safety been satisfactorily addressed?
- 6.8 Does site RA20 fail to meet any of the tests of soundness? If there is a need to identify additional land, are the alternatives proposed at :
  - (1) the non allocated site known as the 'Wilful Murder' site (SA 0432); and
  - (2) the non allocated site known as Waterhead Brake, Brixham Roadappropriate and deliverable?  
Have they been subject to sustainability appraisal compatible with that for the Site allocations DPD and to public consultation?
- 6.9 What is the current situation with regard to the redevelopment at Noss?

## **Wednesday 10 November afternoon**

### **Matter 7a: Rural Areas**

#### **Harbertonford : north of village (RA18)**

- 7a.1 Is the proposed density and scale appropriate in this location?
- 7a.2 Has the Council attached appropriate weight to flood risk?
- 7a.3 Have the traffic and highway safety implications of the proposal been satisfactorily addressed?
- 7a.4 Does site RA18 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at East of Tristford Road (SA 1009) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

#### **Ugborough : east of Primary School (RA29)**

- 7a.5 Is the scale of the proposal appropriate in this location?
- 7a.6 Have the traffic and highway safety implications of the proposal been satisfactorily addressed?
- 7a.7 Has the Council attached appropriate weight to flood risk?
- 7a.8 What are the sustainability credentials of the village?
- 7a.9 Does site RA29 fail to meet any of the tests of soundness? If there is a need to identify additional land, are the alternatives proposed at :
  - (1) the non allocated site at West Alvington (SA 0719);
  - (2) the larger RA29 site as proposed by Tall Oak Homes (SA 0689); and
  - (3) other sites in the village as suggested in representations SA 0055, SA 0712, and SA 1032appropriate and deliverable?  
Have they been subject to sustainability appraisal compatible with that for the Site allocations DPD and to public consultation?

#### **Aveton Gifford : north of village centre (RA9)**

- 7a.10 Does site RA9 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at West Alvington (SA 0719) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

**Ermington : west of Ermington Workshops (RA16)**

- 7a.11 Is the scale and nature of the proposed development appropriate in this location?
- 7a.12 How can provision of infrastructure improvements be ensured?
- 7a.13 Does site RA16 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed at West Alvington (SA 0719) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

## **Thursday 11 November – morning and afternoon**

### **Matter 7b: Rural Areas**

#### **Stoke Gabriel**

- 7b.1 What are the sustainability credentials of Stoke Gabriel? Do they make it an appropriate location for growth?
- 7b.2 Has adequate analysis of potential brownfield sites been undertaken?
- 7b.3 Is there any justification for increasing the element of affordable housing ?
- 7b.4 Overall, are the allocated sites appropriate, feasible and deliverable having regard to the provision of the necessary infrastructure, services, affordable housing and environmental constraints?
- 7b.5 Are the detailed requirements for each of the allocations clear, reasonable and justified? Have site constraints and viability considerations been adequately addressed?

#### **Opposite Rowes Farm (RA25)**

- 7b.6 Is the density and scale of the proposal appropriate?
- 7b.7 What evidence is there that appropriate planting could successfully mitigate the impact of the proposed development on the AONB?
- 7b.8 Have the traffic and highway safety implications been adequately addressed?
- 7b.9 Are the existing infrastructure and services adequate to meet increased demand?
- 7b.10 Has the Council attached appropriate weight to agricultural land value?

#### **Paignton Road (RA26)**

- 7b.11 Is the density and scale of the proposal appropriate?
- 7b.12 Could landscaping sufficiently mitigate the impact of the proposed development on the AONB?
- 7b.13 Have the traffic and highway safety implications been adequately addressed?
- 7b.14 Are the existing infrastructure and services adequate to meet increased demand?
- 7b.15 Has the Council attached appropriate weight to agricultural land value?

- 7b.16 What is the justification for the employment element?
- 7b.17 Is the phasing appropriate?
- 7b.18 Does site RA26 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative larger site proposed at Rowes Farm (SA 0763) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

### **South of Coombe Shute (RA27)**

- 7b.19 Is the density and scale of the proposal appropriate?
- 7b.20 Could landscaping sufficiently mitigate the impact of the proposed development on the AONB?
- 7b.21 Have the traffic and highway safety implications been adequately addressed?
- 7b.22 Is there any evidence of contamination?
- 7b.23 Are there any impediments to early delivery?
- 7b.24 Does site RA27 fail to meet any of the tests of soundness? If there is a need to identify additional land, are the alternatives proposed at :  
(1) the non allocated site at West Alvington (SA 0719); and  
(2) the larger non allocated site at Rowes Farm (SA 0763)  
appropriate and deliverable?  
Have they been subject to sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

## **Friday 12 November – morning (9.30 start)**

### **Matter 7c: Rural Areas**

#### **Wembury : south of Knighton Road (RA30)**

- 7c.1 Could landscaping sufficiently mitigate the impact of the proposed development on the AONB?
- 7c.2 Have the traffic and highway safety implications been adequately addressed?
- 7c.3 Has the Council attached appropriate weight to flood risk?
- 7c.4 Are the existing infrastructure and services adequate to meet increased demand?
- 7c.5 Would the proposal have a significantly harmful impact on the living conditions of neighbours?
- 7c.6 Has the Council attached appropriate weight to the effect of the proposed development on wildlife?
- 7c.7 Does site RA30 fail to meet any of the tests of soundness? If there is a need to identify additional land, is the alternative proposed on land to the south of the recreation ground (SA 0766) appropriate and deliverable? Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation?

#### **Yealmpton : Milizac Close (RA7)**

- 7c.8 Can the proposed site adequately accommodate the Council's requirements, particularly with respect to the allotments and the additional landscaping?

#### **Stokenham : south of Carehouse Cross (RA6)**

- 7c.9 Is the density and scale of proposed development appropriate?
- 7c.10 Would the proposed development have a significantly harmful impact on the living conditions of neighbours?
- 7c.11 Could 'appropriate landscaping' as referred to in paragraph 6.46 sufficiently mitigate the impact of the proposed development on the AONB?
- 7c.12 Have the access and highway safety implications of the proposal been satisfactorily addressed?
- 7c.13 Are the existing infrastructure, services and employment availability adequate to meet the needs of the proposed development?

## **Alternative Proposal: - Stokenham: West of Playing Field**

Issue 7c.14 - Does site RA6 fail to meet any of the tests of soundness?

If there is a need to identify additional land, is the alternative proposed on land to the west of the Playing Field appropriate and deliverable?

Has it been subject to appropriate sustainability appraisal compatible with that for the Site Allocations DPD and to public consultation ?

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## **Friday 12 November – afternoon**

### **Matter 7d: Rural Areas**

#### **Diptford: Wheatpark (RA15)**

- 7d.1 Could planting satisfactorily mitigate the visual impact of the proposed development?
- 7d.2 Would the proposal have a significantly harmful impact on the living conditions of neighbours?
- 7d.3 Have the traffic implications of the proposal been adequately addressed?
- 7d.4 Has the Council attached appropriate weight to flood risk?

#### **Loddiswell: north of Village (RA21)**

- 7d.5 Could 'appropriate landscaping' as referred to in paragraph 6.127 sufficiently mitigate the impact of the proposed development (particularly to the east and north-east of the site) on the AONB?

#### **Salcombe : Bonfire Hill (RA3)**

- 7d.6 Could the impact of the proposed development on the AONB be satisfactorily mitigated?
- 7d.7 What is the Council's position with regard to the enlarged park and ride facility, cemetery extension and additional allotment provision that are referred to in paragraph 6.26?

#### **Salcombe : Shadycombe (RA4)**

- 7d.8 Could the impact of the proposed development on the AONB be satisfactorily mitigated?
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**Alternative proposal: - Salcombe : Gould Road Car Park**

7d.9 Do sites RA3 or RA4 fail to meet any of the tests of soundness?

If there is a need to identify additional land is the alternative suggested on the Gould Road car park site appropriate and deliverable?

Has it been subject to appropriate sustainability appraisal comparable with that for the Site Allocations DPD and to public consultation?