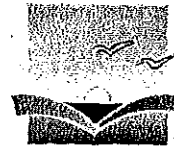


2.8.10 West Alvington also applies to

Arden Gifford Stoke Gabriel
Emmerton Ugborough

South Hams Local Development Framework Publication Stage Representation Form

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



South Hams
District Council

For Official Use Only

Reference No.

SA/0719

Date Acknowledged

Please read the guidance notes before completing this form.

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

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

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

PART A

1. Personal Details 2. Agents Details (if applicable)

Title	Mr and Mrs	Mr
First Name	D	Andy
Last Name	Horton	Shepley
Job Title (where relevant)		
Organisation (where relevant)		GL Hearn
Address Line 1		The Malt House
Line 2		Sydney Buildings
Line 3		Bath
Line 4		
Post Code		BA2 6BZ
Telephone Number		01225 822400
E-mail		andrew_shepley@glhearn.com

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

Data Protection

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

PART B**YOUR NAME:**

Mr and Mrs D Horton

2. To which Development Plan Document does this representation relate?Dartmouth Totnes Ivybridge Rural Areas (please specify which settlement below)Kingsbridge **3. To which part of the Development Plan Document does this representation relate?**Paragraph No.

Proposal No. RA9, 16, 27, 29

Other **4. Nature of Representation**

Do you consider the DPD is:

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

→ In all other circumstances, please go to question 6

5. SoundnessDo you consider the DPD **unsound** because it is **not**:**(1) Justified** **(2) Effective** **(3) Consistent with National Policy**

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

Please fill in a separate sheet for each representation you wish to make.**6. Your representation**

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

See separate sheet

PART B**YOUR NAME:**

Mr and Mrs D Horton

DPD:

Rural Areas

7. Changes to the DPD

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

See separate sheet

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. Examination

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

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

Yes, I wish to participate in the oral examination

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

9. Examination participation

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

We wish to question the Council on why they chose not to include site RA35, despite putting it forward as a viable option at a previous consultation stage.

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

Signature

Date

01/07/2010

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

Please return this form by 4pm on 2nd July 2010 to:

Email: forward_planning@southhams.gov.uk

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

Fax: Marked Forward Planning (01803) 861404

For any enquiries please call **01803 861202**

South Hams District LDF – Site Allocations DPD (Publication Stage)

Representations on behalf of Mr & Mrs D Horton

Proposals RA9, RA16, RA27 and RA29 – Rural Areas DPD

This DPD is unsound by virtue of being non-compliant with national policy.

All of the above proposed allocations are partially within the functional flood plain. The Council should have applied the sequential approach to site allocations for vulnerable uses (e.g. residential), as required in PPS25. Paragraph 16 of PPS25 states:

“LPAs allocating land in LDDs for development should apply the Sequential Test to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.”

Paragraph D.5 goes on to state:

The overall aim of decision makers should be to steer new developments to Flood Zone 1.

Where there are no reasonably available sites in Flood Zone 1, decision-makers can then consider sites in Flood Zone 2 and if no sites are available here, then sites in Flood Zone 3 can be considered. The Exception Test (e.g. if previously developed land is available) only applies when considering sites in Flood Zones 2 and 3.

Alternative available sites in Flood Zone 1 have been put forward during the consultation process; for example Mr & Mrs Horton's site at West Alvington (site WA3 in the April 2009 Sustainability Threshold Assessment). Therefore, the Council has incorrectly applied the Sequential Test to their Rural Areas Site Allocations DPD, contrary to national policy. The DPD is therefore unsound.

Promotion of land at West Alvington

Mr & Mrs Horton would specifically support the allocation of a site at West Alvington (see enclosed Plan) for residential development, as one alternative to the proposed allocations above on the basis of the following:

This site measures 0.7 hectares in area and lies on the eastern edge of the village of West Alvington. It is well contained by the existing village to the west and by an existing improved farm access track that runs along its eastern boundary. There are no accesses or servicing constraints to development on this site.

It is considered therefore that development of this parcel of land represents a logical "rounding-off" for development on this side of West Alvington and could accommodate approximately 20 dwellings. It would not bring built development any closer to Kingsbridge than exists at present.

The site is within the AONB, but it is not visually prominent and can be suitably landscaped to enhance the general setting of the village in this location. It is not within the village Conservation Area and would not affect the character or appearance of this area.

In sustainability terms, development of this land would assist with the retention of localised services in the village and assist with local infrastructure improvements. In this context, the site is appropriate for both private and social housing.

South Hams District LDF – Site Allocations DPD (Publication Stage)**Representations on behalf of Mr & Mrs D Horton**

Finally, it is significant to note that the Council has already considered this site acceptable for development in principle. The Council undertook a consultation exercise earlier this year into additional alterations to the emerging Site Allocations DPD, just prior to the release of the publication version. This previous exercise included the West Alvington site as a potential allocation. In addition, outline development of the site was considered by the Prince's Foundation. It is unclear why the Council did not take the site forward as an allocation.

The site owners are happy for the developable area of the site to be limited to the western triangle (west of the farm access track) if necessary.

South Hams Local Development Framework – Site Allocation Development Plan Documents (DPDs)



South Hams
District Council

West Alvington

At the meeting of full Council on 17 December 2009 it was agreed that the site allocation DPDs be published (anticipated in March). Council also agreed that in some communities further work and consultation be carried out to assure the most appropriate set of proposals, particularly related to newly identified possible sites or to delivery issues. West Alvington is one of these communities.

The maps showing the site options and Sustainability Threshold Assessment (STA) matrices published in May 2009 are still available on the Council's website (www.southhams.gov.uk). Maps and matrices for new sites will be available during the week commencing 11 January 2010.

West Alvington was not included in the initial STA work. However, in response to the May/June community consultation, the Council is now proposing to allocate a site in the village for housing. The DPD extract below shows the proposal for West Alvington agreed by Council on 17 December. Comments are sought on the possible site options and particularly on the site proposed by the Council (RA35).

All comments must be received by 5:00pm on 10 February 2010 and should be sent to the Forward Planning Team at South Hams District Council, Follaton House, Totnes, TQ9 5NE or email forward.planning@southhams.gov.uk.

To assist your parish council, you may also wish to send your comments to your Parish Clerk (joanjohns@btinternet.com).

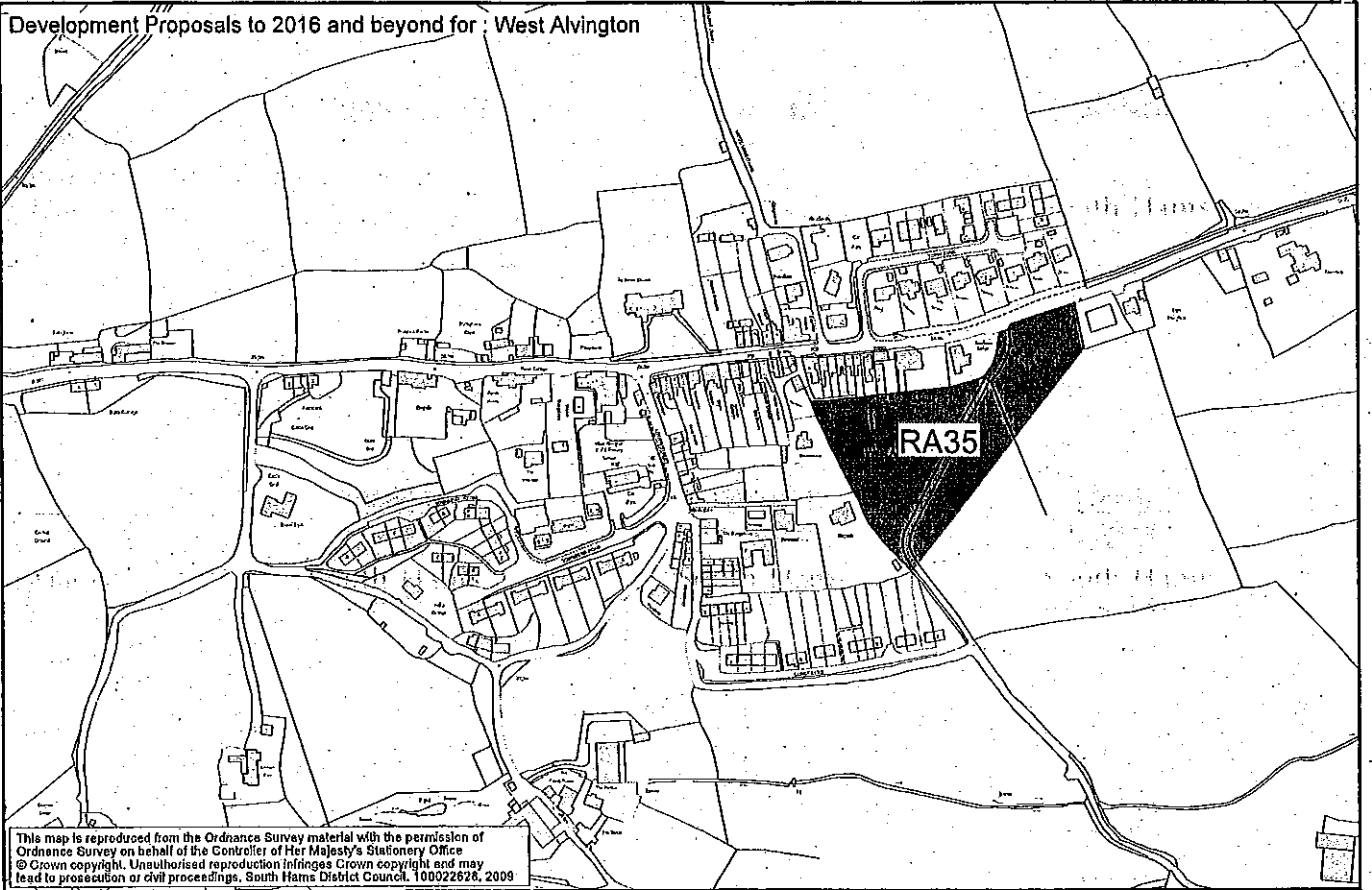
WEST ALVINGTON

Proposal RA35: Land south east of the village

Residential development is proposed beyond 2016, to include:

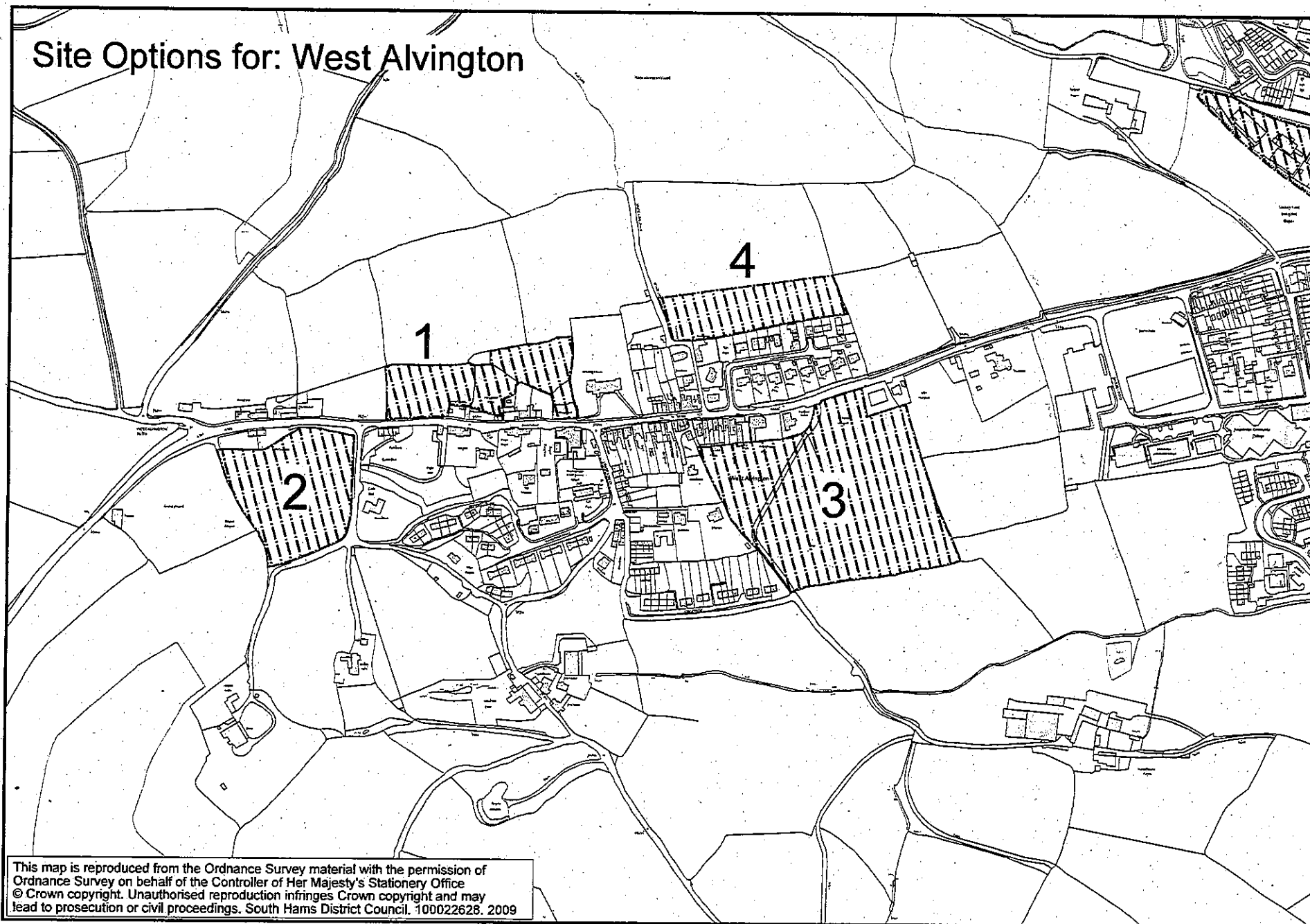
- About 50 dwellings;
- 0.3ha. of employment land;
- Footpath access to the village centre; and
- About 0.1 hectare of play provision and 0.15 hectare of other public space.

Development Proposals to 2016 and beyond for West Alvington



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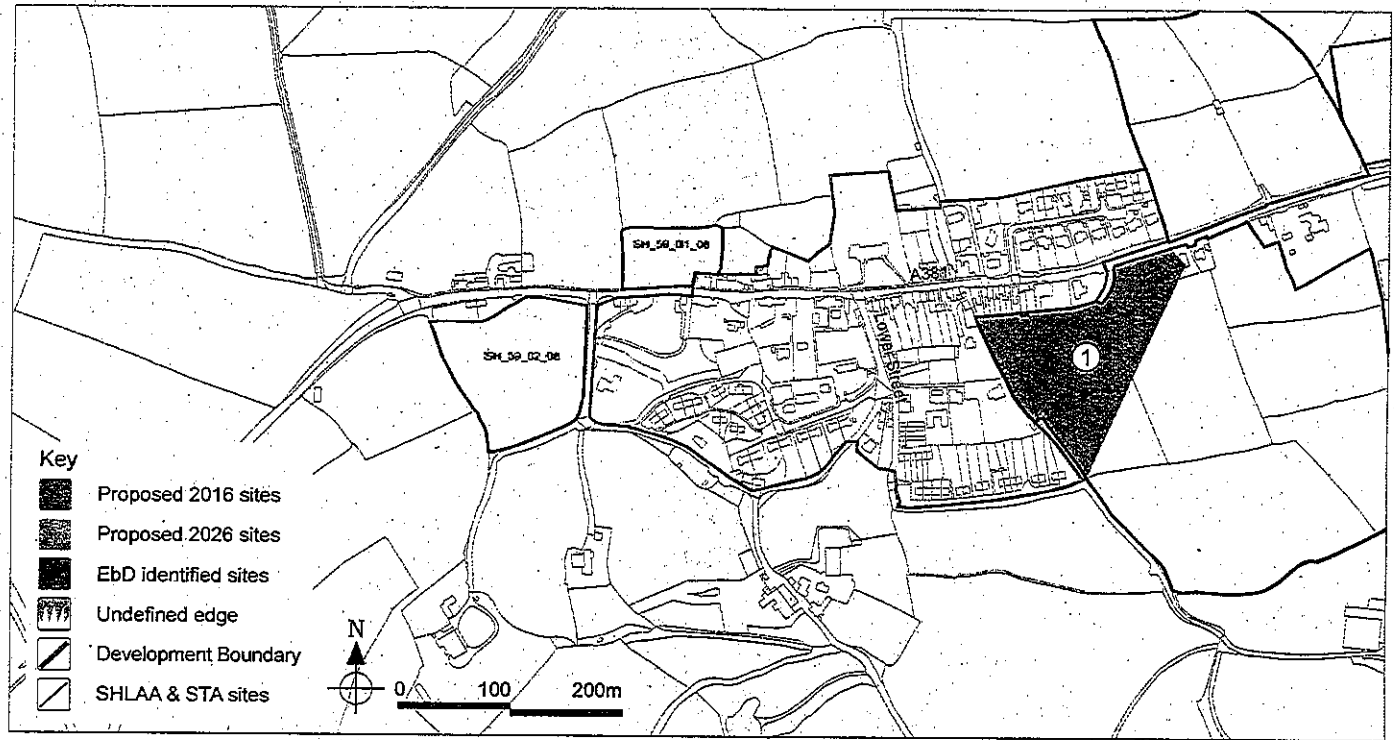
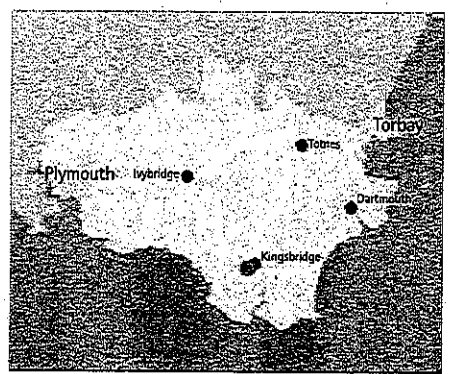
Site Options for: West Alvington



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Sustainability Threshold Assessment			Sustainability Objectives											Key Site Attributes & Constraints	Sustainability Summary
Site Number	Site Name	Site area (ha)	Environmental Constraints							Development Opportunities					
			Land Quality (PDL / ALC)	Flood Risk (Flood zone)	Contamination (land)	Biodiversity (effect on designation)	Protected Landscapes (effect on AONB / DNP)	Visual Impact & Landscape Character	Historic Environment & Cultural Heritage (effect on designation)	Air Quality (AQMA)	Movement and accessibility				
									Walking	Cycling	Public Transport	Private Car			
West Alvington															
1	North of Prospect House	0.45	Grade 3												Constraints - Impact on protected landscape - Visual impact - Vehicular access - Quality of built environment
2	Land to south of Butts Cottage	1.33	Grade 3												Constraints - Impact on protected landscape - Visual impact - Vehicular access - Quality of built environment
3	Site behind Ring 'O' Bells, West Alvington	3.28	Grade 3												Constraints - Contamination - Vehicular access
4	Land to rear of Town Park	0.64	Grade 3												Constraints - Impact on protected landscape - Visual impact - Vehicular access - Quality of built environment

West Alvington Village



- Key**
- Proposed 2016 sites
 - Proposed 2026 sites
 - EbD identified sites
 - Undefined edge
 - Development Boundary
 - SHLAA & STA sites

Issues raised at the workshop

- ◆ West Alvington residents are concerned about coalescence with Kingsbridge.
- ◆ West Alvington has lost its pub and shop and the primary school enrolment has dropped significantly.
- ◆ Residents wish to see additional housing in the village.

Recommendations

- ◆ Site 1 encloses the village envelope and creates a new western boundary to the green gap between West Alvington and Kingsbridge.

2016 housing unit numbers

- ◆ Core Strategy village total = 400
- ◆ Units shown in 2016 design guidance sketch = 40-45

SiteNo.	SHLAA	STA	Site Name	Tot. Ha	Dev. Ha
	SH_59_04_08	3	Site behind Ring 'O' Bells, West Alvington	9.00	1.71
2016 Total					
				total	1.71

West Alvington 2016

Site 1

Context

- Consider as gateway into village from Kingsbridge
- Use existing context to structure plan
- Consider impact on adjoining development
- Consider views into village along A381

Layout - Urban Structure / Access

- Perimeter block form considered
- Plots sizes to be mixed widths
- Access off A381 to connect through to Longfields
- Parking on or off plot acceptable
- Investigate pedestrian links with village centre

Layout - Urban Grain

- Buildings to be set back with front gardens
- Fronts to face over fields
- Backs onto existing village edge
- Typologies to be based upon local context
- Semis and detached housing dominant
- Materials to be based on local traditional vernacular

Mix

- Consider employment site at entrance off A381
- Potential A3 / A2 use

Density and Height

- Residential buildings to be max 2 storeys
- Height along A381 if employment - 3 floors
- Densities should be comparable to context - 25-30ha

(To obtain a housing quantum estimation, these density guides should not merely be applied to gross 2016 site areas as shown in the preceding table, as social and physical infrastructure requirements should be removed first)

NOTE

If the above principles cannot be met due to the sensitive location of the site, then this proposal and village requirements must be reviewed.

