

Totnes Neighbourhood Plan Steering Group Response

1) The Plymouth and South West Devon Joint Local Plan

Do you agree with Vision and Objectives Y N – **Broadly YES**

If “ No “ what other issues should be considered

Are there any other issues you wish to comment on in this section

The vision could be about anywhere. There is no mention made about the distinctive character of SW Devon which includes Dartmoor and much of the South Devon coast which is characterized by coastal and estuarial settlements set in a highly attractive rural landscape offering quality of life which attracts people to the area as a place to live and visit yet where there are real pressures on local people in terms of accessing well paid employment, housing and services.

2) How many homes do we need?

Do you agree with the approach to establishing housing numbers? Y N

We do not disagree with the broad approach, as we fully understand that housing markets are not confined to individual settlements. In the case of Totnes, further factors require consideration.

We are one of the most congested towns in Devon due to our position as the main crossing point of the river Dart for traffic between Torbay and Plymouth and as the rail head and principal access point for the South Hams.

Whilst the approach does not appear to factor in the Exeter, and to a lesser extent Torbay Housing Market, we would confirm that overall assessments fall within those expected from our own housing needs analysis.

The draft is proposing that it will make site-specific allocations in Totnes, Dartington and Berry Pomeroy. The Neighbourhood Planning Steering group have reached broadly the same view- i.e. there is limited space for new homes in Totnes beyond existing consents and allocations and that there is therefore a need to consider the potential for adjoining parishes to contribute to meeting the town's housing needs. This is clearly something which SHDC needs to take the lead on as presently constituted Neighbourhood Plans cannot look beyond their boundaries.

Housing paper as an Attachment

Do you agree with the approach to where the housing should go between Plymouth, the towns and villages and Dartmoor?

This appears to be a fairly pragmatic approach, However we would have expected to see some analysis which demonstrates that proper account has been taken of sustainability factors such as the balance between employment growth and housing which can lead to additional commuting if out of kilter. Exeter for example is much more successful than Plymouth in attracting investment and jobs and has been steadily widening its TTWA. In addition, it is not apparent that account has been taken of the availability of physical and social infrastructure and the environmental capacity of the proposed growth location. For example in relation to Totnes, has special consideration been given to the town's outstanding heritage and landscape setting? One would expect to see an SEA that justified the allocation rather than back fitting the SEA to the allocation. This may leave the plan vulnerable at the examination stage.

Do you have any comments on this section

3) Where should the new homes be built?

Should Plymouth (including the fringe) be the focus for growth? **YES N**
Should allocations for housing be concentrated in and around our Towns? **YES N**
Should some new allocations be made in and adjoining our Local Centres? **YES N**
Should allocations in the villages and village networks, at least in the first instance, be delivered through Neighbourhood Plans? **YES N**

Do you have any comments on this section

While the focus of development in and around Plymouth it is supported, this needs to be kept under review to ensure that housing growth is matched by employment growth.

Within South Hams the focus of growth on towns is supported provided that this can be achieved in a sustainable way. As previously remarked there is no information provided in the document, which demonstrates that a proper SEA analysis has been, undertake of alternative options. For example has the potential new Garden Villages been examined given that the DCLG has invited local planning authorities to come forward with proposals? This is surely something, which should be considered for the longer term given the deteriorating environmental (traffic and air quality) conditions being experienced in towns like Totnes.

Consultation on Neighbourhood Planning has revealed this as a significant concern for local people.

Villages undoubted have the ability and in some case the appetite to accommodate additional homes. However in the case of Totnes where the future housing needs of the town depend on delivery on sites in adjacent parishes, the local planning authority needs to take the lead. In this respect the grouping of Totnes with Dartington and Berry Pomeroy is welcomed and supported.

4) Ensuring Delivery

Do you have comments on this section or an alternative approach to ensuring housing delivery in the villages?

There has been some local interest in Neighbourhood Plans linking together very small self-build/land trust developments around hamlets enabling them to grow and thrive. How can South Hams support this process?

The Totnes Neighbourhood Plan aims to build on the experience with the community-led ATMOS project to put in place policies and mechanisms, which can maximize the provision of locally controlled homes to meet local needs.

5) The Strategic Housing and Employment Land Availability Assessment (SHELAA)

Do you have any comments on the information being used for site Assessment

The information used is in some cases out of date and could be seen as sloppy. Some of these were relevant at that time. However since then other factors or developments have come into place which affects inclusion or numbers allocated

Site boundaries need refining as some of them are inaccurate or cover wider site ownership but disregard areas of Open space and public gardens

Do you have any comments on the assessment of individual sites **YES**

If Yes please name the town/parish and site number and make your comment here

All our comment is made under Potential Sites

6. We need space for employment- Where should it go?

Is Plymouth(including the fringe) the most sustainable location for strategic employment opportunities? **YES N**

Should allocations for employment be made in and around our Towns? **YES N**

Should allocations for employment be made in and around our Local Centres? **YES N**

Should allocations in the villages and village networks at least in the first instance be delivered through Neighbourhood Plan? **YES N**

Do you have comments on this section?

There is a need to strengthen the role of Plymouth City Centre as an employment location, which is accessible by public transport. Too much of the growth of employment in Plymouth has been to the north of the A38 and on the eastern fringe where access from much of the surrounding rural hinterland can only be achieved by car. Settlements like Totnes appear to bear the cost of this growth in car based journeys to work, with 70% of traffic in the town being through traffic.

The Neighbourhood Plan is working with local businesses in determining how facilities can be improved to meet needs for business growth and employment.

Its role as a centre for innovation and green and ethical industry is balanced by its function as a significant service centre for the surrounding population.

Totnes is a vibrant town that is attractive to small companies employing highly skilled staff in niche markets. Companies locate as their customers like visiting, rail connections are good and their staff enjoy living here. Many companies have national and international markets focusing on online presence rather than physical locations and shop fronts. Employees often work remotely further contributing to local sustainability. These new or not so new ways of working generate a demand for other services such as improved IT infrastructure.

7. The role of Neighbourhood Planning

Do you have any comments on this section?

- 1. Neighbourhood Plans have the capacity to deliver a much more fine grained and nuanced set of policies for local areas than the LPA can produce.**
- 2. There is evidently considerable interest in Neighbourhood Planning in South Hams as a means of giving local people a greater say over the way in which the places where they live and work are going to change in the future. The Government is promising to strengthen the role of Neighbourhood Planning.**
- 3. However it cannot be a substitute for professionally led spatial planning undertaken by local authorities either individually or jointly. We therefore welcome the progress made in recent months in progressing the Joint Local Plan which provides greater clarity to NP groups on the strategic context within which they are working.**
- 4. The major challenge facing Neighbourhood Planning groups is one of resourcing. There needs to be more support from Central Government and local planning authorities if groups are going to be able to make progress in a reasonable time otherwise the energy and enthusiasm of volunteers will wane.**

5. It is also vital that landowners and developers are required to recognize the role, which Neighbourhood Planning groups have to play in consultation if their efforts are not to be undermined.
6. Both SHDC and the Planning Inspectorate/DCLG also need to give weight to the policies and proposals contained in Neighbourhood Plans (and emerging documents) in their decision-making.

8. The Potential Sites

Do you have any comments on an individual site identified for potential development

YES N

If Yes Please name the Town./local centre and site number and make your comment here

Do you have any comments on the overall approach to development in a town or local centre? YES N

If Yes Please name the Town./local centre and make your comment here

TOTNES

T1 BALTIC WHARF

The 90 dwelling completed in 2014-16 period leave the remaining site with outline consent for 100 dwellings. The current footprint should clearly identify agreed Open Space amenity land to the south hillside of the development rather than designate all as Mixed Use.

T2 TOTNES KEVICC - Lower Site and Sheep Field

The Neighbourhood Plan Steering Group is strongly of the opinion that site T2 (KEVICC) site should be seen as part of a larger strategic site with the potential for mixed-use development including Education/ Employment/ Housing/ Recreation/ Leisure and Open Space. There is also potential to provide Park & Stride and car parking for the station. The Neighbourhood Plan is exploring the potential for including the Police Station and Magistrates Court as a part of a comprehensive Northern Corridor Plan, involving the rationalisation of emergency service provision (Police, Fire and Ambulance) in the town.

The River frontage of the Lower site should be identified as requiring protection and designated as an environmental area as part of a proposed riverside park. This already identified in the JLP site information packs constraint maps as Flood Zone 2.

These DPD sites and their housing numbers were considered as part of a major redevelopment of the KEVICC site in 2010. It was agreed by the community that there needed to be an overall master plan to ensure a coherent approach to development in this strategically important area. This entailed looking at sites stretching from Babbage Road industrial estate, through the area surrounding the station and Dairy Crest (Atmos) to KEVICC,

At this time the proposals envisaged locating all KEVICC facilities including sports provision on the upper school site, including the relocation of the Grove Primary School from Central Area T3 to KEVICC main site.

This plan also included a significant new piece of land (Z shaped field) to be purchased /leased by DCC from Dartington Trust. This would accommodate replacement Sports facilities including the All Weather Pitch in T2 Lower Field.

In reality, this did not happen. The Grove Primary School was redeveloped on its existing site in the Central Area T3, and opened its new facilities in January 2016 and the Z shaped field is not available.

The T2 allocations were based on 110 lower site and 20 Sheep Field. Since 2010, the redevelopment of KEVICC on the upper site has not been progressed due to lack of capital at County level. The Community College became a Co-operative Trust College in 2011 and the land has now been transferred from DCC to the Dart Valley Trust a new landowner.

The Totnes Neighbourhood plan is working with KEVICC and have appointed AECOM Consultants through Locality to examine options for the whole KEVICC site, and put forward a master plan for consideration by the Governors and Dart Valley Trust. This work is at an early stage and will not be available before 12th August. In these circumstances the Neighbourhood Plan Steering Group would request identifying the whole of the KEVICC site, including Sheep Field, the Police Station and the Magistrates Court as a mixed use development site, with the capacity to accommodate (130) houses).

CENTRAL AREA T3

It is essential that the Central Area should be an important constituent within the Neighbourhood Plan for the town. A Master Plan for the Market Square and surrounding properties is required.

T3, as included in the DPD, comprised four sites, the Market Square and Civic Hall car park, the Central Car parks, the Grove School and Leechwell Gardens. The original DPD gave overall allocation of units for T3 of 70.

The information included in Joint Local Plan consultation document as T3 includes the original allocation. This needs to be updated urgently to reflect the continued use of the Grove School making it unavailable for development. The original estimate for the Grove area was 20 units out of the total of 70.

For the remainder of T3 the question is what can and should reasonably be delivered by way of new housing and town centre uses.

Work on the Neighbourhood Plan has identified support for the principle of upgrading the Market Square and Civic Hall. However the following are key principles of any development

- Heavily design dependent and conditional on community approval
- Market space footprint must not be reduced including market car park
- Development implementation must not threaten livelihood of traders

The current plan for T3 incorporates the large Public Open Space opened in 2010 known as “Leechwell Garden”. This is an actively used and highly valued area of public open space incorporating play facilities, which are currently being upgraded. This area needs to be removed from any potential allocation.

This leaves the existing car parks that are in the ownership of South hams District Council. Previous proposals considered decking over Heath Nursery car park to provide 38 units (with no car parking for the dwellings and no employment land).

The viability of such proposals is clearly open to question. However some indicative work undertaken for the Neighbourhood Plan group demonstrates that it may be possible to achieve some development without materially reducing car park provision. However in view of the sensitivity of this location and the need for detailed master planning it is recommended that a much reduced number of houses is used (suggest 20 to 30 max)

T4 DAIRY CREST (ATMOS)

Estimated dwelling are shown here as 62. There are actually plans for 99 if the McCarthy Stone proposals are included. This additional 37 may go some way to balance reduction in T3

T7 RIVERSIDE

There is clear potential for additional housing on the Parkers Barn site, which is for sale by Devon County Council. Numbers here are not included in the current planned allocation and agreed permissions of 165.

A design statement in line with Neighbourhood Plan policies is required for the area given its' close proximity to the Chicken Run. The Chicken Run is effectively the only area of Public Open Space in Bridgetown with the exception of Steamer Quay and in the OSSR as it has allocated 106 monies; It stretches from the top of Bridge town to the bottom of Parker Way.

NEW SITE - STEAMER QUAY & EMPLOYMENT ISSUES

The Neighbourhood Plan Steering Group is working with South Hams and AECOM to look at Options for Steamer Quay. These will include housing, employment, and leisure /boating/tourism. Consideration of Public realm improvement and more strategic pedestrian and cycle links such as a Bridge to Vire Island as connecting infrastructure and supporting development of the River Park .

The potential role of mixed use development along the river(KEVICC, ATMOS, a regenerated Industrial Estate and Steamer Quay) as a means of delivering working environments for small innovative companies attracted to Totnes will be explored. Policies are required for the intensification of use to ensure that the limited amount of employment land in the town needs to be used for quality job creating activities rather than low grade distribution activities which compromise traffic and health.

There is also potential to coordinate with neighbouring parishes who have more land for such uses

9. Supporting Communities and Services

Do you have any comments on this section?

We would stress the role of the Neighbourhood Plan as identified under section 7 ensuring community involvement and working in partnership not through imposition.

10. Conserving the natural environment and England's finest Landscapes

Do you agree that the potential sites identified with in the AONBs, or close to the ANOB's or Dartmoor National Park are Potential suitable for development Y N

If No are there any changes that you can suggest that would make the sites acceptable?

Do you have any comments on this section?

11. What else do we need to plan for?

Do you have any comments on this section?

The A385 through Totnes carries at least 70% through traffic. The Totnes area is targeted to take more growth than any other rural towns in the plan. There are growing problems with congestion, including areas of excessive pollution as well as other damage to well being and the environment.

Within the next 15yrs, Dartington is targeted to grow by 60% unlike any other village in the South Hams. Paignton is due to grow by at least 15%; station usage is likely to double again. Totnes parish is to grow by at least 20%. Elsewhere in Devon, traffic is said to be increasing by 4% per annum. Meanwhile demand for services within the town will increase due to an ageing population and the withdrawl of services elsewhere.

There are no plans for additional infrastructure to accommodate this growth and Devon County Council seem reluctant to discuss the situation and what might be done to alleviate matters or what cost.aa

Given the strategic location of Totnes in relation to the rest of the South Hams and to Torbay and given the importance of its train station and health and other services to the rest of the South Hams, we would like to see reference to these in the plan and account given to the probable effects of doing nothing to improve capacity, on air pollution, on congestion, on travel to and from Torbay, on the continuing role of Totnes as a rail-head and market town.