Totnes Neighbourhood Plan

Analysis of the responses to the Draft Joint Local Plan consultation

September 2016
1. Introduction

This paper summarises the comments submitted to the South Hams District Council website in response to the publication of the Draft Joint Local Plan. It is primarily concerned with the section on Thriving Towns and Villages which covers South Hams and West Devon. The consultation period lasted from July 1 to August 12th 2016.

SUMMARY HIGHLIGHTS

- Over 1000 responses to the Draft Joint Local Plan for South Hams and West Devon
- 45% of all comments related to Totnes (incl Dartington & Berry Pomeroy)
- Totnes made up over 56% of responses relating to Area Centres (Towns)
- 50% of Totnes responses were concerns about T3 Central Area
- A further 40% were concerns about housing allocations in Dartington

A key backdrop to this consultation has been a local campaign with widespread support and publicity and a petition of over 2800 signatures. This follows the allocation of T3 in the joint plan with a footprint including Market Square, Leechwell garden, Central car parks and Grove School, including a housing allocation for 70 units. The Totnes Neighbourhood Plan Steering group and the Town Council have made strong representations on this area.

Following the draft JLP consultation, a final plan is now likely to be published in February 2017 where there will be a formal consultation and review by an Independent Inspector. This had previously been expected in October. The Totnes Neighbourhood Plan will be required to meet basic conditions of national and local planning policy and therefore must align with the Joint Local Plan in relation to Policies and Site Allocations.

The draft Joint Local Plan was structured identifying six Area Centres (the towns). These are Dartmouth, Ivybridge, Kingsbridge, Okehampton, Tavistock and Totnes (incl Dartington & Berry Pomeroy).

A second tier of settlements known as Local Centres are Bere Alston, Hatherleigh, Lifton, Modbury, North Tawton, Salcombe, Stokenham/Chillington and Yealmpton

2. Response totals

Originally there were 497 comments on the site specific appendices when consultation closed on 12th August. A recent review of the site to undertake the analysis for this paper shows a substantial increase. This was presumably from late submissions or those sent in hard copy. Respondents also highlighted how difficult it was to navigate the website and submit comments. Responses now total 1,044 with 165 on the body of the document, a further 88 on the Sites main Appendix and 791 on individual sites.

<table>
<thead>
<tr>
<th>Responses</th>
<th>Overall</th>
<th>Totnes incl D &amp; BP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main document headings</td>
<td>165</td>
<td>12</td>
</tr>
<tr>
<td>Overall Appendix</td>
<td>88</td>
<td>10</td>
</tr>
<tr>
<td>Site specific appendices</td>
<td>719</td>
<td>443</td>
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<td></td>
<td>1044</td>
<td>465</td>
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The desk top review of responses examined all responses with the exception of site specific appendices for allocations outside the Totnes area (incl D & BP area)

3. General responses referring to Totnes (incl Dartington & Berry Pomeroy)

Of the 165 responses to the main document, 12 were concerned about developments in the Totnes area. These were split equally between concerns about allocations in Dartington and proposals for Totnes, 4 of these specifically about the T3 area.

Of the 88 responses to the Draft Joint Plan main appendix, 10 made some reference to the Totnes area.

Of these, Historic England raised concerns about T1, Baltic Wharf and its position as part of the Gateway to Totnes, AONB raised similar concerns about T7 Riverside, the Environment Agency made representations concerning flood risk in Totnes sites. Remaining responses were from individuals with 4 raising concerned about the Market, 2 about KEVICC playfields and 1 about the Dartington development.

Of the remaining general responses, 8 were from Agents representing Landowners across South Hams and West Devon raising Duty to Co-operate and making some statements that they felt housing allocations were too low. The Totnes Neighbourhood plan Steering Group has reviewed evidence which is set out in the Housing Topic Paper (Chris Balch). Torbay Council (comment ID 765) raised Duty to Co-operate re housing and employment but specifically only made reference to the absence of sites in Marldon and wishes to support a residential proposal for council owned land in Marldon. There was no reference to Totnes or land adjacent in Berry Pomeroy

Harberton Parish Council sent a detailed response that referred to development areas on the edge of Totnes but outside the Totnes Parish boundary, Winsland House. These areas were not proposed by the Draft Joint Local Plan. A further response by landowners proposed significant development on Higher Dorsley this was also not included in the document.

4. Site specific Appendices

The review has primarily focused on individual site comments for Totnes (incl Dartington & Berry Pomeroy). Comments on all the sites across South Hams and West Devon totalled 791, though some of the overall comments also made specific reference to sites. However, the responses vary considerably between areas. Totnes (including Dartington) received 443 responses 56% of all individual area responses for South Hams and West Devon. The next highest number for towns was Kingsbridge with 50.

Modbury and Stokenham/Chillington as small Local Centres received high numbers at 101 and 102 responses respectively. Housing allocations in those areas were 193 and 95. These two areas have draft allocations of 31% of allocations identified for Local Centres which may explain the extent of public concern.
### TOWNS

- Dartmouth 6
- Ivybridge 26
- Kingsbridge 50
- Okehampton 14
- Tavistock 19
- **Totnes 443** (incl Dartington)

### LOCAL CENTRES

- Bere Alston 2
- Hatherleigh 4
- Lifton 3
- **Modbury 101**
- North Tawton 3
- Salcombe 18
- **Stokenham/Chillington 102**
- Yealmpton 0

### TOTALS

- **558**
- **233**

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5. **Totnes - Committed and Potential Sites Appendix**

The analysis of all the responses concerning Totnes (incl Dartington & Berry Pomeroy) showed a huge level of concern from people about the preservation of the historic nature of the area, the centuries old market, the Leechwell Garden and Central car parks. There were 443 responses, a small number of responses covered more than one area and have been categorised below covering 476 areas. Responses to T3

These concerns fell into four main categories

- T3 Central Area, Market Square, Leechwell Garden, Car Parks
- Dartington, Size of Allocations, Broom Park proposals and alternative options
- T2 KEVICC Playing fields and location to the river
- General overarching concerns about the extent of current and proposed development, protection of the enhancement of the Dart

There were also concerns about the continued development of Baltic Wharf and the need to designate Open Space areas and ensure further areas were developed.

<table>
<thead>
<tr>
<th>T3- Central Area</th>
<th>Dartington</th>
<th>T2- KEVICC</th>
<th>General</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>237</td>
<td>188</td>
<td>35</td>
<td>16</td>
<td>476</td>
</tr>
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</table>
6. The NP Steering group response re T3 was as follows

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)

7. Neighbourhood Planning Steering Group response to T2

The Neighbourhood Plan Steering Group are working with KEVICC as set out in the KEVICC response to the Draft Joint Local Plan. Appendix 1 and the Steering Group response in Appendix 2. It supports the entire College site being identified for education, sport and community use with some housing and employment use, rather than just the playing field and Sheepfield site.
8. Dartington responses

The majority of responses on all areas were from individual residents though approximately half of comments on Dartington sites were standard responses as follows with additional comments made by the individual.

Standard Response

a. I understand that the new plan makes provision for 6000 house across the 60 parishes of the district. Allocating 470 to Dartington is unfair and unsustainable for our local environment, community and infrastructure. I believe this number should be halved.

b. I would strongly prefer and development to be focussed on small sites close to existing houses. I strongly object to 100 house on Broom Park

c. Following their new will to work with the community, I would support Dartington Hall Trust in developing smaller, high quality, sustainable and locally built houses on the core of the estate and feel that more than 10 could be built around Barton Farm.

d. Additional comments. Various personal comments including Dartington is a village and should never be lumped with Totnes- this level of development threatens its tranquillity and increases traffic appallingly.

9. Conclusions

It is clear that the concerns expressed by the public to the allocations in Central Totnes, KEVVIC playfields and Dartington have been overwhelming compared with response for any other area across South Hams and West Devon. The Neighbourhood Plan Steering Group need to take clear note of this and use the results of the public consultation in further developing the NP plan.

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Appendix 1

KEVICC response to the Draft JLP

The response below is also supported by the Totnes Neighbourhood Steering Group in their formal responses relating to T2

The Strategic Housing and Employment Land Availability Assessment (SHELAA)

Do you have any comments on the process being used for site assessment? Yes

The approach to site assessment seems not to take into consideration current circumstances and in some cases results in worrying allocations.

Do you have any comments on the assessment of individual sites?

If “yes” please name the town/parish and site number and make your comment here. Yes

Totnes SH_56_14_08/13

Lower School, King Edward VI Community College,

Ashburton Road, Totnes

The assessment of this is very out of date. It does not take into account the site’s current use as a playing field or that the existing All Weather Pitch on the site is due to be replaced and that this replacement will be part funded by a significant amount of S106 money allocated by SHDC. It is therefore very strange to suggest that this site can accommodate 130 houses with no mention of education, the All Weather Pitch or the need to safeguard playing fields and pitches for the College and the community in a town where the open space and playing field allocation falls considerably short of the six acre standard. This assessment appears to have been taken from a previous DPD allocation which included housing and a new primary school on the site. The situation has changed considerably since then and it is alarming that SHDC has not taken these changes into account.

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

If “yes” please name the town/local centre and site number and make your comment here. Yes

Totnes SH_56_14_08/13

Lower School, King Edward VI Community College,

Ashburton Road, Totnes

This allocation, which comprises the College playing fields and the Sheepfield site (on the corner of Barracks Hill and the Western Bypass) is unable to provide the proposed allocation
of 130 houses. This land is owned by the Dart Valley Learning Trust (DVLT) and held in Trust for King Edward VI Community College (KEVICC). Decisions about land use are made by the College Board of Governors who must act in the best interests of the College and are also bound by Section 77 of the Schools Standards and Framework Act 1998.

The College has buildings which are in need of refurbishment and KEVICC via the DVLT owns a considerable amount of land used by the College on the Redworth site as well as the Elmhirst site - either side of the A385. Governors consider there is potential for the entire site to be remodelled to provide education, sport and community use in line with our co-operative principles.

College Governors are working with the Totnes Neighbourhood Plan and external consultants on a Neighbourhood Development Order for the Sheepfield site, part of the same allocation. It’s possible that as part of this process the whole College site could be assessed for its potential for education and community/sports provision. This might include some housing and/or employment use, and it’s possible that the numbers of 130 could be accommodated. This would necessitate the entire College site being identified for education, sport and community use with some housing and employment use, rather than just the playing field and Sheepfield site.

Kate Wilson
Chair of Governors
T2 TOTNES KEVICC - Lower Site and Sheep Field
The Neighbourhood Plan Steering Group is strongly of the opinion that site T2 (KEVICC) 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 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).