

Totnes response

Are you acting as an agent on behalf of someone else?

No

First name Mary **Last name** Coughlan-Clarke

Organisation (where relevant):

Totnes Neighbourhood Plan Steering Group

Address:

Totnes Town Council
5 Ramparts Walk
Totnes

Postcode:

TQ9 5QH

Policy

Policy SPT7, and Section 5.96 -5.110, DEV8, Landscape DEV 26 and DEV 27.

Do you consider the Local Plan to be:

- (1) Legally compliant

Yes – but see below

- (2) Sound

Yes – but see below

- (3) Compliant with the Duty to Co-operate

Yes-but see below

5. Please give details of why you consider the Local Plan is not legally compliant, unsound or fails to comply with the duty to co-operate.

A qualified 'yes' that the plan is 'sound'. The Totnes NP Group has concerns regarding the combined additional new housing development in Totnes and adjoining Dartington negatively impacting on the abilities of the relevant authorities to improve air quality within the A385 AQMA or provide adequate infrastructure particularly in relation to transport) to support the scale of the proposed new housing.

SPT17 (para. 5) refers to “the close relationship between Totnes and Torbay” and links this to possible future developments needs of Torbay being “accommodated in parts of the South Hams”. This should be qualified by the addition of the following: “provided that these needs shall not result in any development breaching any policy contained in this JLP or the supporting “Landscape Character Assessment for South Hams and West Devon draft dated February 2017.

Whilst, TTV25 point 3 refers to ensuring that development singularly and cumulatively will not adversely impact on authorities ability to improve air quality, when this will not be the case, there appear to be no plans or mitigating strategies for this and no mention that at least 70% of traffic is currently through traffic to and from expanding communities whilst the JLP focusses on challenges of short local vehicle journeys. The local community consultations have prioritised improvements to pedestrian and cycle routes across the town.

To satisfy the above, amend TTV25 as follows:

Para (3) add additional sentence: “..No planning consent shall be granted without independent assessment being made demonstrating that the requirement in this paragraph has been met”

Para (5) add as for Para (3) above

Re DEV 26 and DEV 27. There is clear guidance and policy for landscape areas surrounding Plymouth however only Nationally protected landscapes for the rest of the plan. Landscape Character Assessment consultation for West Devon and South Hams was organised on the last day of consultation period. However, DEV22, TTV31, TTV32 are unclear as to how they relate to areas under TTV29 Smaller Towns and Key Villages. To note, Dartington , Stokenham and Chillington are the only villages in this section.

If your representation includes a proposed modification to the Plan, do you consider it necessary to participate at the public examination?

Yes- I wish to participate at the public examination

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

Specific details of housing require reconciliation from the 2016 draft as the exclusion and inclusion of current developments criteria are inconsistent.