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JOINT LOCAL PLAN – CHAT CONSULTATION RESPONSE

Following the Chillington Open Day on the 27th July 2016 and looking at the available documentation, the Chillington Housing Action Team (CHAT) requests the following comments on the Joint Local Plan to be taken into consideration.

CURRENT POTENTIAL SITES (STOKENHAM / CHILLINGTON)

There are only two potential sites on the Joint Local Plan at the moment for the Local Centre of Stokenham & Chillington and both are considered unsuitable by CHAT, SVCA and many of the residents:

Green Park Way SH_53_03_08/13/16	-	65 houses
SE of Carehouse Cross SH_53_21_16	-	30 houses

Green Park Way SH_53_03_08/13/16. CHAT and around 260 other residents of Chillington have already objected to the Green Park Way Planning Application because of the considerable constraints of the site. We were very surprised to see it has still been included in the proposed Joint Local Plan as a potential site.

There are many **additional constraints which make this site unsuitable** and as such it should be **removed from the Joint Local Plan**. Some of these additional constraints are:

- The site lies on elevated land is clearly visible from the AONB and as such would have a significant adverse impact on landscape character.
- Light pollution would be a significant issue.
- This site is prized for its tranquillity and amenity value and must stay that way to avoid noise pollution affecting the residents of Green Park Way and the surrounding area.

- The site is outside the development and settlement boundary of Chillington.
- Green Park Way mainly consists of bungalows with large plots. Developments costs for bungalows suggest this would not be a viable option therefore any development would be at odds with the current bungalow “Street Scene”.
- All 25 properties that adjoin the field will be adversely affected by overlooking and loss of privacy.
- The site would not contribute to good place making i.e. not easy and safe walking distance to the village facilities.
- The narrow lanes running to the east and west of the site have typical Devon Banks and are not suitable for use as pedestrian / cyclist access to the village.
- The site is considered to be car dependant because of the lack of suitable pedestrian / cyclist access to the village centre.
- Site does not accord with the provisions of the development plan in force for the area.
- The site adjoins / affects a public right of way.
- A major South West Water pressurised water main runs under the site attracting significant building restrictions.
 - Building is not permitted 3 metres either side of the pipe. The pipe is around 4ft deep and earth must not be substantially altered around it.
 - The pipe must also only run in a “public area “. Failure to meet this criteria will result in it having to be re-routed at the developers cost.
- The site is not suitable for a Sustainable Drainage System (SuDs):
 - The site is on a 1 in 8 (possibly 1 in 6) north to south incline and also slopes west to east towards Coleridge Lane and there is no area on the site suitable for an attenuation tank to be located.
 - The fresh water spring on site (which is piped down to the A379) cannot be used for the disposal of surplus surface water because some land owners have Riparian Rights and will not give "Disposal Consent".
 - In 2016 an Agricultural Land Classification confirmed that the site is near saturation point for 226 days of the year.

SuDs Drainage Report. A report from an independent civil engineer with 36 years of experience of industrial, commercial and residential developments, specialising in highways and drainage design including flood alleviation and SuDs has recently been submitted to SHDC LPA and DCC which **confirms the site is not suitable for SuDs.**

ALTERNATIVE SITES.

At the Open Day there was some discussion about alternative sites and Bulls Field & Meadows Field (Chillington), Meadow Field (Chillington), Land behind Holbrook Terrace (Stokenham) and Old Playground, Carehouse Cross (Stokenham) were mentioned.

Meadow Field & Bulls Field, Coleridge Lane (SH53_13_13). This site may be suitable for up to 20 houses but:

- There is a history of significant flooding around Coleridge Lane which needs to be resolved.
- Vehicle access would be through “Brooklea” (a development still to be completed) and this would add more traffic to what may prove to be a difficult access point onto the A379 in the village centre. To add more traffic onto this “pinch point” may not be acceptable.

Meadow Field, Coleridge lane (SH53_12_12_13). Although not in the Joint Local Plan, this site was mentioned at the Chillington Open Day. This site may be suitable for a small number of self- build houses. There is a stream running through the field which floods. However if flooding is resolved the space could be a useful asset and used as a welcomed common recreational area for the village centre, in addition to some self-build houses around the perimeter.

- There is a public right of way across the field.
- Currently there is no vehicle access onto Coleridge Lane, but access is possible.

Land Behind Holbrook Terrace, Stokenham (SH_53_19_16). We agree with the Stokenham residents, this land is more appropriate for development even though it is inside the AONB.

Old Playground, Carehouse Cross, Stokenham (SH_53_02_13). We agree with the Stokenham residents, this land is more appropriate for development even though inside the AONB.

Land to the NE of the village of Chillington. North of the A379.(SH_53_04_13). This is a very large plot of 6.67 hectares adjacent to the 2 x land plots preferred by the Stokenham Village Community Association (SVCA). We have suggested and recommend that 40 % (or less) was offered up, it would join up 3 x plots to provide a viable acceptable alternative and enhance the village facilities:

- Enable easier vehicle access from the A379 into the 3 x plots.
- Would still leave a sizeable patch of land (around 4+ hectares) so that the villages would not be “joined up” and maintained their own identity.
- Some of this land, even though inside the AONB, could be used as common recreational land with a sports field, tennis court and bowling green with changing rooms etc.
- The land is relatively flat therefore more suitable for SuDs and cheaper to build on, which should result in the houses eventually being be more affordable.

Local Centre Allocation. The Local Centre (Stokenham & Chillington) is being considered together for a minimum allocation of 95 houses for the period 2014 to 2034. It is important to understand the history of development in the two villages.

- Over the past 50 years Chillington has been the subject of around 14 developments of over 400 houses.
- Stokenham has had around 2 developments of about 35 houses.

More recently over the period 2011 to 2016:

- Chillington has struggled with 3 developments (Helmets Field / Copperfield / Brooklea) to provide around 62 houses mainly in the village centre (82% within the AONB).
- Stokenham has provided none.

We would therefore like to think that our Local Centre partners would agree to shoulder a larger proportion of the total up to the year 2034. It is on this basis that we have suggested that a % of the land to the NE of the village of Chillington (north of the A379) is added to the SVCA preferred plots and would meet around 80% of the Local Centre housing allocation proposed in the Joint Local Plan up to the year 2034.

PERIOD OF STABILITY

In the **Local Centre of Stokenham / Chillington**, Chillington has seen at least 62 properties built mainly in the village centre between 2011 and 2016. The village now needs a period of 7 to 10 years to settle down again, see improvements to the infrastructure and to allow the residents some respite from the considerable upheaval that development brings. This period of stability is also supported and recommended by Stokenham Parish Council and should be in their response.

TYPE OF PROPERTY

In principle it is understood that some development is required and the Joint Local Plan does cover a period of 20 years (2014 to 2034). The current Affordable Housing policy is a joke and should be called Un-affordable Housing. What we really require is:

- Local homes which are truly affordable and **protected by local covenants** to ensure they are only available to local people and **not available on the open market.**
- Starter Homes for local young people and families at truly affordable prices, with local Devon covenants.
- Small scale developments for local young people and families where properties are truly affordable.
- Self-Build Homes.
- Suitable Sheltered Homes for older people to free up some larger properties for families to buy or rent.

What we do not need is more second homes or holiday homes

INFRASTRUCTURE

On page 18 of the document there is mention of **the Infrastructure Delivery Plan which will accompany the Joint Local Plan**. We agree that Improvements to infrastructure must go hand in hand with development therefore **“no infrastructure improvements = no development”**. Within Chillington we need infrastructure improvements:

- There is a need to address the flooding issues experienced by the village, especially down Coleridge Lane and in the village centre.
- There is a need for improved pedestrian routes to access village facilities.
- There is a need to provide safe pedestrian crossing points in the village.
- There is a need for a 20mph speed restriction through the centre of the village.
- There is a need to reduce traffic congestion in the village.
- There is a need to improve parking facilities in the village.
- There is a need to for more local employment opportunities in the local area.
- If more development is planned, there is a need for a larger Primary School in Stokenham.
- There is a need to improve safety on the A379, especially at Oddicombe Corner, which should either be widened or have traffic lights installed on a temporary trial basis.
- There is a need to clarify the sewerage capacity situation with SWW. When storm water enters the sewage system the main sewage pipe in Tanpits Lane overflows into Tanpits Brook, which flows down into Frogmore Creek and the Kingsbridge / Salcombe Estuary.

We have already highlighted problems with the infrastructure in the CHAT Response Document sent to SHDC LPA regarding planning application 0771/16/OPA and a copy (in pdf format) was emailed to Strategic Planning on the 7th August 2016.

The lack of investment in the area is glaringly obvious, both in the private and public sectors. Upmarket residential development does not improve the economy.

- Kingsbridge is the Area Centre for a large catchment area and it is fair to say that tourism is the main industry driving the local economy, but it is seasonal and many people are poorly paid and work part time.
- The A379 serves a large area to the east of Kingsbridge, some 30/40 square miles, but its structure lies in the past when there was very little traffic. Very little improvement has been carried out apart from tarmac road surface, but it now carries over 1.5 million vehicles per annum, many of which are of considerable weight and size.

Permanent Increase in Traffic. An important point to consider is that any development results in a permanent increase in traffic. Although the tourist traffic is seasonal and is important for the local economy we are now faced with the possibility **of at least 200 new dwellings between Torcross and Kingsbridge**.

We are a car dependant area and therefore looking at 200 houses x 2 cars per family x 4 movements per day.

- This equates to about 1600 permanent car movements per day.
- An additional 584,000 journeys per year **to add to the existing congestion on our roads.**
- Taking into account the current problems with the A379, erosion of The Slapton Line and ever increasing heavy traffic over New Bridge (just outside Kingsbridge) it is a situation we are very concerned about and which **Strategic Planning must take note of.**

A considerable amount of public and private investment is required before any further large scale development should even be considered as an option by Strategic Planning.

The priorities are commercial investment to create a healthy all year round economy, investment in starter homes and homes to rent long term, to encourage young people to remain or move to the area.

Building upmarket housing is a short term solution to improving the local economy and continues the trend towards an increasing ageing population.

Emergency Vehicle Response. With the increase in road congestion on the A379 it is becoming increasingly difficult for emergency services to rapidly access the area and this was clearly demonstrated between Frogmore and Torcross during the floods on the 16th June 2016. Building more houses adds even more pressure to the system, which makes infrastructure improvements essential.

The Devon Air Ambulance is already in emergency demand throughout the county and could be suggested as an emergency solution. This excellent service would be ideal but without substantial government funding it is difficult to see how this service could be expanded enough to provide cover, should road infrastructure improvements through the **Infrastructure Delivery Plan** not be possible.

STRATEGIC PLANNING

Local Centre. It is interesting to note that Stokenham & Chillington have been grouped together as a Local Centre on par with Modbury / Salcombe and Yealmpton. This “Local Centre” consists of around 770 houses which could increase to around 865 by the year 2034.

Our location **at the heart of the AONB constrains the scope for further development** because paragraphs 115 and 116 of the NPPF say that “great weight” should be given to conserving landscape and scenic beauty in the AONB.

The Joint Local Plan. This plan is all about strategic planning for future housing development up to the year 2034. With this in mind we believe that the SHDC Strategic Planners must take note of the two major things that will happen in the future regarding The Slapton Line (Torcross) and the New Bridge (Bowcombe Bridge near Kingsbridge).

A379 at Torcross (The Slapton Line). It is well known locally and by the SHDC LPA that the long term future of the A379 along the Slapton Line linking the Kingsbridge side of Torcross with Dartmouth, is in serious question due to frequent damage to the coastal road as a result of storm events and coastal erosion.

- The Slapton Line was closed again in 2016 due to storm damage and coastal erosion. As a result the back lanes were gridlocked due to the amount of traffic, lack of passing areas and flooding.
- The Slapton Line and the A379 main road running along the back of Slapton Sands between Torcross and Strete Gate will become increasingly vulnerable to rising sea levels and wave erosion, resulting from the predicted frequent storm events.

Ultimately the road will become unusable and we suspect in planning terms this will be sooner rather than later

In a relatively short space of time Chillington / Stokenham / Torcross could become the end of the A379 from Kingsbridge. In this respect, if Strategic Planners do not take this aspect into consideration **they could be responsible for the creation of dead end villages in the South Hams.**

Common sense needs to prevail and be linked to Strategic Planning. Major housing developments should not be considered in an area where the key route out of that area (A379 Torcross to Dartmouth - The Slapton Line) is at significant risk of being lost to the sea and the only remaining key route left (A379 from Torcross to Kingsbridge) is a single lane country road that is already under significant pressure.

New Bridge. At the other end of the A379 (just outside Kingsbridge), New Bridge (known locally as Bowcombe Bridge) is nearly 200 years old. This stone bridge now provides **a vital transport link between Dartmouth and Kingsbridge** but was built in the horse and cart era when there was no heavy traffic.

Approximately **1.5 million vehicles now cross New Bridge every year (increasing to over 2 million if the planned development up to the year 2034 takes place).** With all the additional heavy transport passing over this bridge the durability and structural condition is **“of local concern”** especially after the collapse of a similar highway structure near Tenbury Wells in Worcestershire on the 24th May 2016. Any structural damage to this old stone built bridge will be extremely costly to resolve, but isn't this what Strategic Planning is all about?.

There is a very real scenario where the A379 Slapton Line at Torcross is impassable (due to erosion) and New Bridge on the A379 just outside Kingsbridge is compromised (due to increased heavy traffic use), **resulting in this part of the South Hams being completely isolated** with the small single track Devon lanes as the only way in or out of the area.

As with the Slapton Line, common sense needs to prevail and be linked to Strategic Planning. No major housing developments should take place in an area that does not have the highway structure in place to accommodate the extra volume of traffic it will generate.

Strategic Planning must surely take The Slapton Line and New Bridge scenario into consideration when planning for the future. With this thought in mind, it may be prudent to look again at what the National Planning Policy Framework says that “Sustainable” means:

“Sustainable means ensuring that better lives for ourselves does not mean worse lives for future generations”.

JOINT LOCAL PLAN CONSULTATION ARRANGEMENTS

Main Thrust. The main thrust of the Joint Local Plan Consultation is based around residents being computer literate. It requires residents having a computer, access to various websites and to the submission of information on the Consultation Portal. Many residents do not have access to the internet and it seems like the opinion of these residents is being ignored.

The reasons behind the urgency for Consultation on this Joint Local Plan are known and understood. What the Strategic Planners must understand is that not all residents in the South Hams are computer literate or have access to a computer and needs hard copy documentation.

Non-availability of Booklets. The Thriving Towns and Villages booklet and the response form was not available prior to the Consultation Period in sufficient numbers to give residents, without access to the internet, a chance of reading the booklet, digesting the content, asking questions and responding in writing by the target date of 12th August 2016.

For Strategic Planning to even suggest that residents can visit the Town Hall or the Public Library to view the limited hard copies available is nothing short of insulting. Even if they could get there, they would have found only one or two copies of the booklet were available because there was not sufficient funding to print more copies or for a copy to be printed for each household.

Time to Read, Understand and Comment. Does Strategic Planning realise how long it takes to read through and digest the contents of this document? This is such an important subject that will shape our future and **funding should have been made available.** Each household in the South Hams should have received a copy and given time to read, understand it and respond in a realistic timescale.

Consultation Period. This whole thing has been rushed through to such an extent that somebody even decided the Consultation Period would start from the date the Joint Local Plan was first published on the website on the 1st July 2016 and finish on the 12th August 2016. What a joke, sorry but there is no other way to say it.

Within the South Hams people are passionate about where they live and the beautiful environment they live in and obviously wish to protect it as best they can. Deep down they know

there is a need for some new housing to maintain or expand village life, attract and encourage younger people and families to put down roots.

United in Condemnation. One good thing this may produce is communities that are united in their condemnation. Unfortunately for many, it will all be too late and their views will not have been taken into consideration.

New Joint Plan. We live in hope that SHDC will be able to put together an acceptable plan that will be approved by the government inspector early in 2017 and formally adopted by the SHDC otherwise the South Hams will be "in default" again.

If the Joint Local Plan is rejected by the government inspector, we are concerned that the door will be open for landowners and developers in the South Hams to lead the way and inflict housing on us for personal profit, regardless of whether there is a need or it is in the right sustainable place.

Residents Without a Computer. The opinion of those residents who do not have access to a computer or the required skills to use it, are just as important as those who are computer literate. They are still entitled to put forward an opinion on the Joint Local Plan, in writing or by using the Response Form. They are being denied this Right by the way Strategic Planning failed to providing sufficient hard copy booklets, supporting documentation and response forms.

Planning take the trouble to produce and print a "Thriving Towns and Villages Booklet" which contains a wealth of information and requests comments (page 3) by completing and returning the response form included with the booklet:

- A response form was not included with the booklet.
- Sufficient copies of the response form and booklet were not available for those residents who do not have a computer to view and study the proposals on line.
- To make matters worse, without access to the booklet, it is impossible to fully complete the response form.

Some Chillington residents went down to the Town Hall and the Public Library in Kingsbridge and found they only had one or two copies of the booklet and minimal numbers of the response form. We contacted Strategic Planning and received confirmation that:

- No more booklets are available.
- A black and white photocopy of the response form would be acceptable to save costs.
- Based on this we have ordered 500 copies of the response form from our local printers and will forward the £80 invoice to Strategic Planning for payment.
- We now understand that Strategic Planning do not have the resources to process large numbers of paper copies and that it would be helpful for people to group together or for organisations to collage peoples individual thoughts.

Method of Responding. It was not made clear at the outset that residents were not required to complete the whole response form and only when pressed did Strategic Planning clarify there were 4 ways of responding:

- Using the consultation portal:
http://plymouth.objective.co.uk/portal/planning/jlp/shwd_thriving_towns_and_villages?pointId=s1467104835717#section-s1467104835717
- E-mailing to strategic.planning@swdevon.gov.uk
- Completing a response form
- Writing to South Hams and West Devon Place Making Team, c/o Follaton House, Plymouth Road, Totnes, TQ9 5 NE.
 - This can be individual letters or a common letter produced by a group and signed by local residents.
 - There is no requirement to use the response form which is a summary of the online questions.
 - Open written responses are very welcome.

Chillington eventually received the flexibility of response requested but unfortunately it may have been too late to significantly boost the response. Why was this flexibility of response not recognised and published from the start. Did everybody in the South Hams have the same flexibility opportunity? Why was the response form printed in colour when black and white would have saved at least 50% of the printing costs!

The way this Consultation has been carried out (without adequate access to the essential explanatory booklet, supporting documentation and clear instructions on what to do) is in our opinion a shambles. This is not a democratic way to carry out such an important Public Consultation, especially when it is for housing and development for the period 2014 to 2034.

Yours sincerely

Chillington Housing Action Team (CHAT)

Date: 10th August 2016

Committee Members:

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