

5th December 2017

Mandy Goddard
Neighbourhood Planning Officer
SHDC/WDBC

Graham Swiss
Specialist (Strategic Planning) Place & Strategy
SHDC/WDBC

Dear Mandy and Graham

Peter Sandover and I met on Friday and went through your informal comments in detail. We have accepted the majority but there are one or two issues on which we have comments to make. In brief, our responses are:

1. Amended as suggested
2. Amended as suggested
3. Amended as suggested
4. While we agree in general terms, our belief is that the input from community groups during consultation was one of the things that gave people a feeling of participation in the process and “demoting” that part of the text to an appendix might be seen in a negative light, so we have made no change. The description of the area, incidentally, with its focus on the wider parish rather than just the village, is something helped people see the area from a new perspective and evoked a positive response.
5. Updated as suggested
6. See below
7. Amended as suggested
8. Amended as suggested
9. Amended as suggested
10. Amended as suggested
11. See below
12. We should make it clear that there were certain passages in the pre-submission that were intended to explain to the community the reasons for a policy and/or what would be involved in bringing it to fruition. To a certain extent these may have clouded the issue of deliverability. As the community is now aware of the background we have reworded to make the position more clear. Deliverability is as one would expect at this stage in the process. Correspondence will be added to the Evidence Base. We are in discussion with Highways concerning the Bird Walk.
13. See below
14. Agreed – renumbered
15. Amended as suggested
16. We believe that the wording, in the NP, relating specifically to local heritage assets and the conservation area, probably helps ensure developers would take account of it.
17. Amended as suggested
18. Amended to take account of your comments
19. We don't disagree but feel that the text that follows explains the objective.
20. See below
21. Amended as suggested.

22. Amended as suggested.
23. Amended in line with suggestion and an existing detailed paper will be added to the Evidence Base. We were under the impression from the SHDC/WDBC guidance paper on the subject that although we could propose LGSs we could not designate them. It was not clear whether the invitation to contact you related to LGSs or the need to publish material on the website. We would be grateful for clarification on that.
24. We believe it does and informs the community.
25. Amended as suggested
26. Amended in line with suggestion

I hope that is helpful.

Points 6, 11,12, 13, 20

The NP Steering Group believes these issues sit in a wider context, which should be taken into account. We would be happy to include some or all of the following in the revised draft if you feel that would be helpful.

We had already stated that the figure of 10 was indicative, and have now altered the text to make it clear that it relates to the village only.

However, although you have suggested that our focus is predominantly on the village we in fact have a very strong focus on the parish as a whole, and we hope that wider picture will be taken on board – both in the process of bringing the NP into force and in the approach by the LPA to planning applications in future (it not being clear to us whether the aims of neighbourhood planning policy in terms of giving communities a voice in the development of their own neighbourhood and only allowing development that is contrary to neighbourhood plans if there are “very good reasons” for going against their provisions when planning applications are considered will have much, if any, effect on how planners in LPA offices actually deal with communities in future and take into account their wishes as expressed in neighbourhood plans).

You say that “where housing proposals come forward in excess of these figures consideration will be given to them provided they can be shown to meet an identified local need and are sustainable.” We find that disturbing as it appears to question the role of NDPs. It does not sound as though you feel the test for going against their provisions needs to be very robust. We would welcome your reassurance on that basic point. We also feel that incorporating the kind of wording you suggest would positively encourage developers to come forward with applications for “unplanned” sites.

As you know, we have made the point that since 2014 more than 100 (117 at the latest count) new dwellings have been created in the parish of Stoke Fleming, or planning permission given. That excludes the development at Cotton. A good many of these have taken place in the rural areas. Despite the “strategic policies that seek to prevent new dwellings in the remote countryside”, permission was given for 36 at Bugford/Hillfield and the conversion of 15 at Bowden, increasing the size of those hamlets by 175% and 115% respectively. These communities are now reaching a size where they are settlements in their own right. Overall, that 117 represents an increase of around 20% in the number of households in the parish over the past three years. Cotton, of course, could mean a further increase of up to 80%, or 100% in total. We believe our credentials in supporting new development are excellent.

In terms of whether the former site H3 is not now needed, a new development of 24 homes, including nine affordable ones, was recently completed in School Road. Permission has been given for a further 19, including six affordable ones, in the same area. Taking into account 34 that had already been created on School Road within the past few years, including a good proportion of affordable ones, that makes a total of 77. Residents have experienced, and will continue to experience, long periods of disruption. Local patience in respect of development in that particular area is at breaking point. Its open views along the coast and across Start Bay are about to be partially obscured by the new development referred to above, which is on the west side of the road. Our site

H3 would have been on the east side and would have left the character of the area unchanged. We withdrew it because the neighbourhood plan would certainly and understandably have failed at referendum if it had been left in. That is the reality on the ground.

On need, within the parish the actual need in terms of high and medium need is six, and we have amended the table to make that clear. Ten of the 18 were Band E – i.e. no housing need- and two were low need. The new developments at School Road and Cotton will more than meet current and foreseeable need, so there is no need for additional affordable housing elsewhere at this stage. We are collaborating with Dartmouth in respect of our joint needs.

We have in any case provided the mechanism for regular reviews at five-yearly intervals so that we can take account of changing need – and have said we will revisit the former site H3 if appropriate and once residents have had a respite from construction and feelings have moderated.

We should also point out that Stoke Fleming Parish Council supported the Stage 1 development for 240 homes at Cotton and has said it will support the Stage 2 development, though it believes that one element of it unnecessarily would result in intrusive visual impact on the AONB. We are due to meet Thomas Jones of SHDC on site to discuss options to ameliorate that. That is a further indication of the positive approach we take to development. Although SHDC sees Cotton as meeting the needs of Dartmouth the residents there will be our parishioners and we expect to encourage them to take advantage of the many activities, social groups and amenities that exist in our small but very vibrant community.

The draft NP clearly states that we feel growth has been beneficial in the past and will continue to be so in future. At the outset of the consultation process, in “Choices for Change” we countered the general mood of opposition to development by highlighting the massive amount of change that has taken place over the past 50 years and posing the rhetorical question: “If that had not taken place and the village had stayed as it was how sustainable would it be today?”

In conclusion, we feel strongly that this wider picture, taking into account what has happened as well as what is to happen and acknowledging our positive attitude towards development should influence the attitude of the LPA towards the NDP, the status of which should be respected when considering planning applications. We hope for a strong and positive dialogue between the LPA and the parishes within the region that are involved in the neighbourhood planning process.

Kind regards

A handwritten signature in blue ink, appearing to read 'Struan Coupar', written over a large, light blue circular scribble.

Struan Coupar
Stoke Fleming NDP Steering Group