

Working together



South Hams District Council

Draft Response to the

Kingsbridge, West Alvington and Churchstow Neighbourhood Plan Regulation 16 consultation

March 2022

The Kingsbridge, West Alvington and Churchstow Neighbourhood Plan (Reg 15 Version) was submitted to South Hams District Council on 17th December 2021. The Council was satisfied that the submission draft and accompanying documents complied with all the relevant statutory requirements

The plan was publicised in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations and representations invited between Friday 28th January 2022 to Friday 11th March 2022. South Hams District Council made a full response to the Regulation 14 consultation carried out by the Qualifying Body in respect of the Kingsbridge, West Alvington and Churchstow Neighbourhood Plan.

This document sets out South Hams District Council's response to the Regulation 15 version of the plan, focussing on the extent to which it is considered that the current version of the draft plan has responded to comments made at Regulation 14.

Overall, the Council is not satisfied that the Regulation 15 draft neighbourhood plan has taken adequate account of comments made at Regulation 14 and there remain areas of concern that are detailed below.

NB: APPENDIX 1: "The Economic Development perspective on key brownfield sites identified in the Kingsbridge, West Alvington and Churchstow Neighbourhood Plan" which is referred to in respect of the Council's comments on Policies KWAC Em2 and BE1 accompanies these comments.

Policy/Text	Comments
<p>Policy KWAC Env1 Settlement Boundaries and the avoidance of coalescence</p> <p>Settlement boundaries for Kingsbridge, West Alvington and Churchstow are designated in this Plan and illustrated in Figures 14, 15 and 16. Development inside the settlement boundaries will be supported in principle subject to National Policy and Guidance and the Development Plan.</p> <p>Development proposals outside the settlement boundaries will be treated as development in the open countryside.</p> <p>To protect the character and appearance of Kingsbridge, West Alvington and Churchstow, development which erodes the visual separation of the settlements, the natural infrastructure and biodiversity network features will not be permitted.</p>	<p>No comment.</p>
<p>Policy KWAC Env2 Local Green Spaces (LGS)</p> <p>The following green open spaces within the plan area are designated as Local Green Space. These areas illustrated in Figure 17 and detailed in Appendix A3 are small tracts of land, meet the criteria described in NPPF paragraph 102. All development within or in the vicinity of the LGS must respect and not compromise this designation.</p> <p>KLGS1 Duncombe Park KLGS2 Kingsbridge Recreation Ground KLGS3 Rack Park amenity space KLGS4 Quay House Grounds KLGS5 Kingsbridge Community Garden KLGS6 Trebble Park Play Area</p>	<p>Concerns remain regarding the allocation of small spaces/highway verges in Churchstow (Figure 17c). Such spaces do not meet the criteria for LGS designation.</p> <p>Concerns remain that the following designations could compromise Council plans to make improvements.</p> <p>KLGS2</p> <p>KLGS6</p> <p>KLGS8</p>

<p>KLGS7 Bowcombe Amenity Space. KLGS8 Brittons Field. KLGS9 Thomas a Becket Cemetery. KLGS10 Southville Cemetery. KLGS11 Montagu Road Play Area KLGS12 Homelands amenity space KLGS13 Church Street Gardens KLGS14 Land at rear of the Old Vicarage, Plymouth Road, Kingsbridge. KLGS15 Cookworthy Museum garden KLGS16 Embankment Gardens, Embankment Road KLGS17 Wallingford Road Community Space KLGS18 Trebble Park Allotments KLGS19 Tennis Club, Ebrington Street. KLGS20 Kingsbridge Community College (KCC) sports fields</p> <ol style="list-style-type: none"> 1. KCC All-weather pitch 2. KCC grass area to front of main Entrance (old Cricket Pitch). 3. KCC Playing Fields and rugby pitch to south and east (over A379) of school. 4. Rugby pitch, Belle Hill. <p>WALGS1 Townsend Road/Close WALGS2 Green open space between the WA village Hall and School WALGS3 East of village hall WALGS4 Home Field Amenity Space WALGS5 Small copse at the top of footpath 5 CLGS1 Land west of St Mary's Church CLGS2 Land to south of St Mary's Church CLGS3,4&5 Grass verges CLGS6 Entrance to Woodlands</p>	<p>The amendments to Appendix 3, in response to the Council's original comments, are noted. However, it is considered the Policy, as it stands, should reflect any specific issues relating to particular LGS allocations. As the Policy stands it could compromise proposals that are supported by SHDC and KTC. The content of an Appendix would have secondary material significance to the Policy itself in the determination of any planning application.</p>
<p>Policy KWAC Env3 Impact on the Natural Environment, South Devon Area of Outstanding Natural Beauty (AONB), green corridors and green infrastructure.</p>	<p>Marked in red: Criterion a) delete "the latest" add "any relevant" since all TPOs should be considered.</p>

In addition to National and Development Plan policies and guidance controlling development in the South Devon AONB, Undeveloped Coast, countryside and the rural landscape, development within the parishes must demonstrate the following; -

a) an awareness of and management for wildlife corridors through the plan area

informed by the green corridors identified in this plan (Figure 18 and Appendix B1) the South Hams Green Infrastructure Framework, and the **latest** Tree Preservation Orders;

b) how it maintains and enhances the intrinsic character of the landscapes affected;

c) why it cannot be accommodated reasonably outside the Undeveloped Coast designation;

d) how the natural assets and constraints of a development site have been assessed.

Substantial harm to or loss of irreplaceable habitats such as ancient woodland, historic boundary features, banks and ditches should be wholly exceptional;

e) how opportunities for improving public access to and the enjoyment of the estuary and countryside have been included;

f) A commitment to biodiversity net gain as outlined in JLP Policy Dev 26, SHDC's Climate Change and Biodiversity Strategy (2020) and DEFRA's latest Biodiversity Metric;

g) Where appropriate that new biodiversity connectivity routes have been included within planting proposals;

<p>h) That all new planting shall utilise only native species which are locally appropriate.</p>	
<p>Policy KWAC Env 4 Locally Important Views Locally important views are described below and illustrated in Figure 19 and Appendix A4. The quality of these views within the settlements and to the estuary or the countryside should be safeguarded in any future development within the parishes of the Plan. Development should not be overly intrusive or prominent to the detriment of the view as a whole, or to landmarks within the view.</p> <p>KV1 Buckwell Road towards Coombe Royal KV2 Saffron Park to Coombe Royal KV3 Manor Park to Wallingford Valley KV4 Saffron Park to Wallingford Valley KV5 Washabrook Lane looking NNE KV6 Washabrook Lane to Tunge Lane KV7 Water treatment works access road across the estuary KV8 Gerston Lane to Southville (detail) KV9 Gerston Lane to Southville. (panorama) KV10 Darky Lane eastwards KV11 Darky Lane to Coombe Royal KV12 Fore Street looking South KV13 Tunge Lane KV14 Buckwell Road to Malborough KV15 Saffron Park to St. Edmunds Church KV16 Washabrook Valley KV17 Sorley Cross to Kingsbridge KV18 Vincent Road to West Alvington KV19 Town slipway looking East KV20 Buckwell Road looking NW KV21 Crabshell to Kingsbridge (detail) KV22 Crabshell to Kingsbridge (panorama)</p>	<p>Concerns remain regarding the number of views subject of this Policy. Including so many could dilute the effectiveness of the Policy which should be aimed at key views.</p>

<p>KV23 Plymouth Road (A379) approaching Kingsbridge from Churchstow WAV1 Tackett Wood Bridge WAV2 Old Salcombe Road Eastwards WAV3 Town Park from Kingsbridge showing the green gap WAV4 Lower Street Cottages WAV5 Main Street West Alvington WAV6 Reservoir and green gap between West Alvington and Kingsbridge WAV7 Longbrook Lane northwards WAV8 Longbrook Wood northwards WAV9 Home Field to Kingsbridge CV1-4 Merrifield panorama CV5 Long Lane to Churchstow CV6 Church House Inn CV7 Churchstow from the A381 CV8 Church House Inn and cottages CV9 Churchstow to West Alvington</p>	
<p>Policy KWAC Env 5 Prevention of light pollution. Development should not detract from the unlit environment of the Parishes and should minimise its impact on the night sky.</p> <p>The impacts of a development on dark skies must be considered at application stage following the guidance of the Institute of Lighting Professionals on the impact of bats of lighting schemes (guidance note 8, Bats and Artificial Lighting)</p> <p>The use of a high proportion of glass in walls and roofs without consideration of the impact on the environment when internally lit will be discouraged.</p> <p>Security lighting, outside lighting, and floodlighting should only be used where a clear need is</p>	<p>Marked in red: Final paragraph: it would not be possible to insist on or enforce the requirements set out. Suggest these could become suggestions in the justification.</p>

<p>demonstrated and be designed to minimize their impact on the night sky with lighting deflected downwards and switched off after midnight.</p>	
<p>Policy KWAC Env 6 Prevention of Flooding and the impact on water quality Development proposals should, where necessary demonstrate that the impact on the existing foul and surface water system has been assessed and includes details of onsite mitigation if required.</p> <p>Any proposals in the proximity of the Environment Agency flood risk areas illustrated in Figure 20a (fluvial flood risk), 20b (surface water flood risk) and Appendix B19 should have due regard to historic flooding incidents and the reports of these prepared on behalf of Kingsbridge Town Council, Devon County Council and South West Water.</p> <p>There should be no adverse downstream impacts from water discharge on local streams, leats, flood channels and neighbouring properties.</p> <p>Proposed developments must not exacerbate water issues within the Salcombe to Kingsbridge SSSI.</p> <p>Development proposals should incorporate SuDS in accordance with DCC’s SuDS for Devon Guidance (2017)⁷ and any sites located within the Kingsbridge Critical Drainage Area (Appendix B40) as defined by the EA should abide by the stricter drainage requirements.</p>	<p>No comment.</p>
<p>Policy KWAC Env 7 Carbon Reduction This Plan supports and encourages development including works to existing buildings that is designed and constructed to the highest standard of sustainable</p>	<p>Second paragraph: Marked in red replace “should” with “are encouraged to”.</p>

<p>design and construction, energy efficiency, incorporating on-site renewable energy production, and carbon reduction.</p> <p>All development within the parishes should demonstrate an awareness of the Devon Carbon Plan.</p> <p>The use of recycled and natural materials sourced within Devon is encouraged.</p> <p>The Parishes will work with SHDC to encourage householders and businesses to upgrade their premises and adopt practices and lifestyles that reduce their carbon footprint and achieve low and ideally zero carbon emissions. This will include energy conservation, reduction of waste and avoidance of single use plastics.</p>	
<p>Policy KWAC Env 8, Encouraging renewable energy</p> <p>Where planning permission is required the development of small-scale renewable energy generation with supporting infrastructure will be encouraged, this includes; -</p> <ul style="list-style-type: none"> • Biomass; coppicing local woodland and hedgerows; • Hydro; power generation from local watercourses; • Small scale solar power when roof mounted on domestic, employment and agricultural buildings; • Ground source and air source heat pumps; • Community energy projects involving the above technologies. 	<p>No comment.</p>

<p>Wind turbines and large-scale ground mounted solar power are not considered appropriate methods of generation within the South Devon AONB part of the Plan area. For the purposes of this policy small scale is defined as less than 50Kwp.</p>	
<p>Policy KWAC Env 9, Allotments The plan supports the retention of community allotments at Trebble Park, and Wistaria Place, Kingsbridge and to the North of West Alvington Hill. The importance of these assets to the community, and local food production is recognised and the re-purposing or encroachment on these existing sites will not be supported. The need for further provision should be monitored in line with demand from increased waiting lists and the needs of new residents.</p> <p>Where appropriate development that includes provision for community allotments will be supported.</p>	<p>As already indicated Trebble Park is identified as an LGS and that designation could prejudice potential improvements thereto.</p>
<p>Policy KWAC Env 10 Promotion of tree planting Development where it is demonstrated that the proposals achieve a net gain in biodiversity and carbon capture through additional tree and other planting and appropriate land management will be supported.</p> <p>Development that damages or results in the loss of ancient trees or trees of good arboricultural and amenity value will not normally be permitted. Proposals should be designed to retain ancient trees or trees of arboricultural and amenity value. Proposals that impact on existing trees should be accompanied by an assessment of the health and longevity of any affected trees.</p> <p>New tree planting should use only native, locally appropriate species, must not conflict with and should complement wildflower rich grasslands.</p>	<p>Marked in red.... “Proposals that impact on existing trees should be accompanied by an assessment of the health and longevity of any affected trees.” This sentence need not be included since tree surveys, where appropriate, are a standard DM requirement.</p>

<p>Community based initiatives to plant trees and enhance biodiversity, wildlife habitats and corridors within the plan area will be supported where appropriate.</p>	
<p>Policy KWAC H1 Affordable Housing Proposals for affordable housing development within the settlement boundaries or as exception sites will be supported where:</p> <p>a) The number of affordable homes to be delivered is in line with the need as defined by the housing needs assessments, Devon Homes Choice or the local affordable housing register in place at the time and where a need has been identified, includes custom and self-build plots where feasible.</p> <p>b) The range and size of dwellings especially single bed units is in line with the need as defined by Devon Homes Choice.</p> <p>c) Housing for the increasing number of older people, and those with special needs in the parishes is provided in the form of sheltered, extra care or assisted living housing.</p> <p>d) Homes are proposed for rent, purchase and shared ownership. Based on the recommendations of the HNA for this Plan approximately 75% of Affordable Housing units should take the form of rented tenures such as social and affordable rent, with the remaining 25% as affordable routes to home ownership, focused on First Homes.</p> <p>e) Discounted 'First Homes' for young families shall be provided in line with National Policy. To respect the</p>	<p>Para 5.4.1: Last Sentence: Note the removal of West Alvington since the Regulation 14 submission. However since Policy KWAC Env1 accepts the presumption in favour of development within the Settlement Boundaries of Churchstow it is suggested limiting new provision to affordable housing is not permissible.</p> <p>General Comments on Policy KWAC H1</p> <p>South Hams District Council declared a housing crisis on 24 September 2021. In part this was in recognition of the challenges for young people to afford to live locally, either in rented accommodation or through affordable home ownership. We support the KWAC Neighbourhood Planning Group's production of a local Housing Need Survey which will support developers to meet specific identified needs during the lifetime of the Neighbourhood Plan once made. The wording of policy KWAC H1 used within the neighbourhood plan to seek boost local affordability is however potentially inconsistent with the strategic policies of the Joint Local Plan and in some places misleading when considering national guidance.</p> <p>Policy KWAC H1 makes reference to support for affordable homes within settlements and exception sites within a combined list of criteria. This includes a priority for First Homes as an affordable home ownership product. The KWAC Neighbourhood Planning Group should be aware that First Home Exception Sites are not eligible within Rural Designated Areas or within Areas of Outstanding Natural Beauty (AONB). This was made clear in the written ministerial statement (24 May 2021) which is afforded planning weight within the National Planning Policy Framework (paragraph 6). This would mean such sites would not be appropriate on land within West Alvington and Churchstow Civil Parishes and within the southern area of Kingsbridge Civil Parish..</p>

evidence of the Housing Needs Assessment (Appendix A8) discounts should be 50% on a new home price to ensure First Homes are affordable to local incomes.

f) Homes should be occupied by people with a local connection which is defined within the SHDC Adopted Local Allocation Policy (2017). The early needs of key workers (e.g. health, fire brigade and lifeboat crew) should be considered exceptional circumstances under the provisions of the allocation policy.

g) Affordable housing for sale is subject to a legal restriction to ensure the homes remain affordable and that the discount is maintained in perpetuity;

Such developments could include proposals for Community Led Housing.

Strategic Policy SPT3 of the adopted JLP sets out the overall policy target for affordable housing delivery within the plan area. Policy DEV8 sets out the percentage of affordable Homes expected to be delivered on and offsite in order to achieve this total within the Thriving Towns and Villages Policy Area. The JLP Supplementary Planning Document (Para 4.79) sets out the preferred split of affordable Homes to be 65% as social rent and 35% affordable home ownership products. The policy thresholds for affordable housing were informed by an assessment of housing need at the strategic level in the Strategic Housing Market Assessment and through viability testing to ensure that such thresholds would not impact the overall deliverability of new proposals for housing including development allocations in Kingsbridge. The evidence assumptions used in these documents were subject to examination at a Public Inquiry in respect of the JLP. The proposed policy for KWAC H1 (criteria d & e) changes the assumptions used in two ways:

- a) It seeks to set a percentage requirement for social rent Homes at 75% of total affordable Homes delivered.
- b) It seeks to prioritise First Homes as the preferred form of home ownership model and provides evidence in a Housing Need Survey (AECOM, 2021) to suggest such Homes be sold at a 50% discount on market value based on levels of local housing need without viability evidence.

The Housing Needs Survey effectively highlights the concerning lack of housing affordability, however in changing viability assumptions without update or reference to existing viability work there is a level of risk which the KWAC Neighbourhood Planning Group should be aware of. The Written Ministerial Statement states that policy compliance including First Homes will be judged at the equivalent total value as locally adopted affordable housing policies (in this case JLP Policy DEV8) with at least 25% of those affordable homes as First Homes. No viability evidence has been undertaken to support the AECOM study to show that applying 50% discount to 25% of affordable Homes will not lead to a reduction in the overall proportion of affordable Homes at any given residential site and which would now be considered policy compliant. We do not know from the evidence presented whether this policy approach will lead a reduction in the

	<p>number of both homes for Social Rent and the scale of impact on all affordable housing delivery in the Neighbourhood Plan Area should the plan be made.</p> <p>For the above reason, in the absence of viability testing to prove otherwise, we cannot support the inclusion of First Homes in this policy. The approach to discounted First Homes has the potential to reduce affordable housing delivery and conflict with strategic policy SPT3 of the Joint Local Plan which seeks to deliver a minimum of 2,050 affordable Homes up to 2034. It is also unclear whether the policy would significantly prejudice the ability to meet the identified affordable housing needs of specific groups.</p> <p>Specific Issues relating to KWAC H1 criteria</p> <p>Criterion a: See General comments above. Additionally, whilst the housing waiting lists and Devon Homes data base provide important information for assessing local housing need, the starting point should be the Strategic Housing Market Assessment linked to an up-to-date local housing needs assessment.</p> <p>Criterion b: As above for assessing housing mix requirements simply using Devon Homes information will not provide the full evidence base.</p> <p>Criterion d) See General Comments above.</p> <p>Criterion e) See General Comments above.</p> <p>Criterion f) The definition of Key workers changes over time, it is not appropriate that the Neighbourhood Plan identifies specific key worker categories this is best achieved by a review of the Local Allocations Policy.</p> <p>Criterion g) This is not entirely correct. Parts of Kingsbridge outside of the AONB are classed as main town and stair casing is allowed to 100% as per Homes England grant funding requirements.</p>
<p>Policy KWAC H2 Market Housing Proposals for market housing will be supported within allocated sites of the JLP, on infill sites within the</p>	<p>No comment.</p>

<p>designated settlement boundaries of the Plan or as part of an exception site as set out in Policy KWAC H3 (If market housing is required to cross subsidise the affordable housing scheme). The housing should respond to local housing needs in terms of type, size, special needs, and tenure. Consideration should be given to provision of housing solutions for young families and the increasing number of elderly in the parishes in the form of development aimed at older persons, including market sale sheltered, extra care or assisted living housing. This Plan also supports opportunities for existing residents to downsize and make more larger units available to the market.</p>	
<p>Policy KWAC H3 Rural Exception Sites outside the settlement boundaries. This plan supports the use of Rural Exception Sites to deliver affordable housing where they comply with National Policy and JLP policy TTV27 and all other relevant policies in the Development Plan.</p>	<p>This Policy repeats JLP Policy without adding to it.</p>
<p>Policy KWAC H4 - Principal Residence</p> <p>a) This policy only applies where it has been identified in the latest Census that an individual parish in the Plan area there are 20% or more 'household spaces with no usual residents'. Once this threshold has been exceeded new open market housing excluding replacement dwellings will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a 'principal residence'. This restriction will be secured through a section 106 agreement'.</p> <p>b) Principal residence is defined as one occupied as the residents' sole or main residence, where the residents spend the majority of their time when not</p>	<p>The Census is not the only indicator of the level of second home ownership. Furthermore, it is carried out every ten years and will not pick up this trend in home ownership swiftly .Most Groups produce evidence based on the Census plus other available information often survey work carried out by themselves. Suggest therefore the evidence base to be relied upon is wider and more flexible.</p> <p>Criterion a: Suggest additional wording in red is added to the second sentence to provide clarity that the Principle Residence Policy will apply in that Parish not generally in the Plan Area:- <i>“Once this threshold has been exceeded new open market housing excluding replacement dwellings, within that Parish, will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a ‘principal residence’. This restriction will be secured through a section 106 agreement”</i></p>

<p>working away from home. The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them.</p> <p>c) Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition and will be obliged to provide this proof if and when SHDC requests this information. Proof of Principal Residence includes but is not limited to residents being registered on the local electoral register and being registered for and attending local services including healthcare, and schools.</p> <p>d) Once the 20% threshold has been exceeded this policy will apply to all new build development both allocated and windfall sites where open market housing is proposed within the Neighbourhood Plan Area.</p> <p>e) A replacement dwelling is defined as a single new build dwelling replacing an existing dwelling of equivalent size and design as the original dwelling.</p>	<p>Criterion d) Suggest wording change in red is introduced to provide clarity as to where the Principal Residence Policy will apply:-</p> <p><i>Once the 20% threshold has been exceeded this policy will apply to all new build development both allocated and windfall sites where open market housing is proposed within that Parish.</i></p> <p>Criterion e) Suggest this clause is better placed in the supporting text.</p>
<p>Para 5.5.1</p>	<p>Last sentence: Suggest removal of this sentence. The proposal that no business development is permitted in Churchstow is out of accord with JLP Policies DEV 14 and 15.</p>
<p>Policy KWAC Em1 Safeguarding of existing employment uses. Retention of existing employment sites is supported in the Plan area unless other suitable sites are found that</p>	<p>This policy is unclear in its intent and undermines JLP Policy DEV14. The first sentence of Policy KWAC Em1 opens by stating that, ‘Retention of existing employment sites is supported’, but weakens this by stating ‘unless other suitable sites are found that are more compatible with...’ This</p>

<p>are more compatible with the existing transport infrastructure and surrounding residential neighbourhoods. Changes of use resulting in the loss of employment land to the Plan area will not be supported.</p> <p>Where the loss of an employment related site is justified as no longer viable the applicant must demonstrate through an independent assessment that the vacant unit has been actively marketed and offered at a reasonable sale price (comparable with valuations achieved elsewhere in the District) for a minimum period of 1 year.</p>	<p>introduces ambiguity into the policy position, and opens the scope for a ‘test (‘more compatible’) that would be very difficult to assess. The final sentence of this clause then appears to rule out this scope by stating, ‘Changes of use resulting in the loss of employment land to the Plan area will not be supported.’ Furthermore, the wording of this final sentence is unclear – what does, ‘to the Plan area’, mean? This phrase should be deleted. If it is attempting to restrict any relocation of employment uses to within the NP area only, this is unrealistic and unachievable.</p> <p>In terms of the second paragraph of this Policy, JLP Policy DEV14, linked to Paragraph 5.9 to 5.13 of the JLP Supplementary Document 2020, set out the exceptional circumstances where change of use may be acceptable and the requirements to prove such a case. It is considered the wording and intent of this Policy undermine the exceptional circumstances JLP Policy DEV14 seeks to apply.</p>
<p>Policy KWAC Em2 the regeneration and intensification of employment sites at Lower Union Road and Orchard Industrial Estate.</p> <p>Ancillary retail and residential uses forming part of live work or small infill developments will be permitted providing the employment uses are not compromised. In such mixed use developments only user class E (commercial, business and service) employment related uses will be permitted.</p> <p>In order to consider improvements on a comprehensive basis rather than piecemeal development a development brief for the regeneration of Lower Union Road , Orchard Industrial Estate and the adjacent Western Backway has been prepared and included in Appendix B33. All development in the area described in figure 23 should respect and respond to this brief.</p>	<p>Strong concerns remain regarding the content of this Policy. The “redlining” of this area in the NP, at this juncture, could lead to undesirable consequences. For example the buying and selling of land may be unduly affected since the proposed designation will appear on land searches. The Roger Tym Study is dated, the preparation of a Development Brief for this area should be based on up to date research alongside robust and full consultation with landowners, tenants and employees. The Development Brief that has been produced sets out some good ideas for future development/redevelopment of the area. It is suggested this needs to be worked through fully with stakeholders before its inclusion in the NP.</p> <p>NB The Council’s Economic Development Officer has undertaken an appraisal of the site covered by this Policy which is included as <i>APPENDIX 1: The Economic Development perspective on key brownfield sites identified in the Kingsbridge, West Alvington and Churchstow Neighbourhood Plan</i></p>
<p>Policy KWAC Em3 Support for the central shopping area of Kingsbridge</p>	

<p>A development brief for Kingsbridge Primary Shopping Area has been prepared and included in Appendix B32 All development in the area should respect and respond to this brief.</p> <p>At upper levels of the Primary Shopping Area this plan supports development of flats over shops in vacant or under-used accommodation. Ancillary uses will be permitted providing they do not undermine the shopping and historic characteristics of Fore Street and the Primary Shopping Area. The amenity of existing uses should not be compromised with new development through noise, smells and congestion on pavements.</p> <p>Where the loss of a retail related site is justified as no longer viable the applicant must demonstrate through an independent assessment that the vacant unit has been actively marketed and offered at a reasonable sale price (comparable with valuations achieved elsewhere in the District) for a minimum period of 1 year.</p>	<p>Second Paragraph: First sentence: Suggest this reworded (shown in red) as follows:- <i>“Where the loss of a Class E use is justified as no longer viable the applicant must demonstrate through an independent assessment that the vacant unit has been actively marketed and offered at a reasonable sale price (comparable with valuations achieved elsewhere in the District) for a minimum period of 1 year.”</i></p>
<p>Policy KWAC Em4 Mixed use employment including living over the shop, and live work. A combination of employment and living accommodation is supported providing; -</p> <p>a) the development is in keeping with the scale of the surrounding residential area and other businesses;</p> <p>b) the new use will not have any detrimental impact on local residential amenities;</p> <p>c) significant amounts of traffic and a need for parking will not be generated that cannot be adequately catered for by the existing infrastructure locally;</p>	<p>Last paragraph marked in red: Suggest the last sentence is removed since it does not provide clarity for the decision maker. The remainder of the Policy is clear in its intention.</p>

<p>d) The proposal will not have a harmful visual impact on either the village, town or the adjacent open countryside.</p> <p>Mixed use is defined as development of sufficient size to accommodate a genuine business use and any residential accommodation is ancillary to that use.</p>	
<p>Policy KWAC Em5 Promotion of innovative tourism businesses</p> <p>This plan supports development that extends the tourism season and includes new, innovative and sustainable tourism related uses. Activities include but are not limited to:</p> <p>a) Estuary and water based leisure activity, excluding those harmful to the marine and foreshore environment and contrary to the latest South Devon AONB Estuaries Plan and the Salcombe and Kingsbridge Harbour Bylaws;</p> <p>b) The research and development of technologies that support the marine leisure industry;</p> <p>c) Glamping, camping, camping barns and lodges that link to the SW Coastal Path and cycle routes;</p> <p>c) Cycle and electric cycle hire facilities supporting sustainable tourism and transport.</p> <p>The proposed uses should be compatible with their surroundings and setting within the town, river, countryside and must have no adverse effect on the South Devon AONB.</p>	<p>No comment except there are two criteria c).</p>
<p>Policy KWAC Em6 Support for training links that reinforce the existing skills base</p>	<p>No comment.</p>

<p>and emerging new types of employment. Opportunities for the development of employment uses that promote hospitality, tourism, local traditional and rural skills and safeguarding these for future generations will be encouraged.</p> <p>The introduction of opportunities for new and emerging clean employment types that include but not limited to marine, healthcare, digital, and clean energy will also be encouraged.</p> <p>Development proposals in the above sectors will be supported where they provide training facilities to improve the knowledge and skills of local people.</p> <p>Development proposals that establish training links with the South West's universities and further/higher education facilities will also be supported.</p>	
<p>Para 5.6.2.3</p>	<p>Opening sentence: This statement seeks to exclude brownfield sites that may arise in West Alvington and Churchstow. Suggest the Policy should apply to the Plan Area as a whole.</p> <p>Last sentence: Suggest reference to the intensification of use at Torr Quarry, in a neighbouring parish, is inappropriate.</p>

Policy KWAC BE1 Brownfield first

This Plan promotes the redevelopment of previously developed land or 'brownfield'- first strategy before any greenfield sites other than those allocated in the JLP can be considered for development. This strategy complements the greenfield sites allocated in the JLP and ensures that there is flexibility in this approach whilst minimising further encroachment on the countryside and AONB unless there is proven demand that cannot be met by the brownfield-first approach. The brownfield sites that may be suitable for long term re-development as and when there is landowner support and they become available include existing industrial estates, employment areas, depots, garage workshops, and builder's merchants located within the urban area of Kingsbridge. Such sites may become redundant within the lifetime of the Neighbourhood Plan and would benefit in the long term from intensification of existing employment sites and more effective use of land or change of use to mixed use (C3 Housing and E Commercial, Business and Service.)

As stated in policy KWAC EM1 changes of use resulting in the loss of employment land to the plan area will not be supported. A schedule of sites that the community may look favourably on for intensification or redevelopment and a plan locating these are included as Appendix B36 and B14. All proposals for re-development must demonstrate conformity with other policies of this Plan with respect to the protection of the natural and historic environment.

First paragraph, opening three sentences: It is unclear how a developer would be able to demonstrate that there are no suitable brownfield sites available before proposing development on Greenfield Land as a part of a planning application as suggested within the policy.

General comments on Policy KWAC BE1

As commented previously, the principle of support for brownfield development accords with Policy SPT1 of the JLP. However the wording of this policy is convoluted, lacks clarity and appears at odds with the NPPF, the JLP and Policy KWAC Em1. In particular, the Policy refers to named viable and active employment sites, none of which have been subject of formal site assessment, by reference to Appendices B14 and B36. While the Policy does refer to avoidance of the loss of employment uses it details local employment types and identifies specific sites that theoretically could, given the terms of the Policy, become available for redevelopment. As such, the Policy appears to do nothing more than promote the redevelopment of these sites. The wording has the potential to encourage speculative applications and to encourage landowners/purchasers to consider more profitable land uses at these locations thus undermining the existing uses, many of which enhance the sustainability and mixed use nature of Kingsbridge. This approach is not in accordance with the strategy of the JLP which seeks to support business growth and employment opportunities (SPT1, DEV14) and prioritises our main towns as a location for employment and services (TTV1). Furthermore the promotion, as it appears, of the loss of employment sites to residential use does not accord with the general principals, set by the NPPF, which supports the retention of sustainable uses.

NB The Council's Economic Development Officer has undertaken an appraisal of key sites covered by this Policy which is included as *APPENDIX 1: The Economic Development perspective on key brownfield sites identified in the Kingsbridge, West Alvington and Churchstow Neighbourhood Plan*

<p>Re-development of brownfield sites should be subject to a comprehensive survey of existing heritage assets and must avoid harm to these assets and protect and enhance the historic environment as set out in national and local policy.</p> <p>All detrimental water impacts of any brownfield site on the estuarine environment and the Kingsbridge and Salcombe Estuary SSSI through surface water run off during construction and operation must be fully assessed prior to a planning application for re-development. Proposals must also address level 2 and 3 flood risks; the Sequential Test must first be successfully applied. The Exception Test may also need to be applied for certain components of the proposed redevelopment.</p>	
<p>Policy KWAC BE2 Kingsbridge Quayside and town square</p> <p>The Plan supports improvements to the quayside and town square; these develop further the aims of JLP Policy TTV 10. The improvements identified below will affect the existing locations of car parking however, there should be no significant loss in car parking spaces available to support the town’s shopping and tourism roles with particular recognition being applied to the importance of this existing car park to tourism and trade.</p> <ul style="list-style-type: none"> • A sustainable transport hub for non-fossil fuel modes of transport; • Enhanced southern slipway providing easier access to the slipway, dinghy storage and water; • Small scale tourist related employment units in the order of 200m2; • Space and service connections for temporary(pop-up) food and retail outlets; 	<p>Final paragraph, second sentence: Suggest this is reworded as follows:-</p> <p>“All redevelopment of the Quayside and town square should consider this brief.”</p>

<ul style="list-style-type: none"> • Homes in the order of 60 units addressing local needs; • Flood risk mitigation and management measures; • Relocation of the public toilets; • Retention and enhancement of the skateboard park; • Overall enhancement of the public realm while retaining the existing uses. <p>A development brief expanding on the above qualities is included in Appendix B34. All redevelopment of the Quayside and town square should respect this brief. The area covered by this policy is illustrated in Figure 25. Re-development of the Quayside and town square should be subject to a comprehensive survey of existing heritage assets and must avoid harm to these assets and protect and enhance the historic environment as set out in national and local policy. The evidence supporting the 2017 Kingsbridge Quayside masterplan included as Appendix B9 should inform the proposals. All detrimental water impacts on the estuarine environment and the Kingsbridge and Salcombe Estuary SSSI through surface water run off during construction and operation must be fully assessed prior to a planning application for re-development. All proposals must also address level 2 and 3 flood risks, the Sequential Test must first be successfully applied. The Exception Test may also need to be applied for certain components of the proposed redevelopment.</p>	
<p>Policy KWAC BE3 Design Quality</p> <p>1. Development proposals in the plan area must demonstrate high quality design and will be supported where; -</p> <p>a) They are innovative and locally distinctive and respond to and integrate with the local built surroundings, landscape context and setting. A</p>	<p>As indicated at and before Regulation 14, there is no need to repeat Policy Guidance set out in National Guidance, the JLP and JLP SDP (criteria b, e and g).</p> <p>In terms of stipulation 2 as indicated at Regulation 14 no evidence has been presented to support the need for Policy requirements for the sub division of plots.</p>

contemporary design solution will be supported providing it respects the context and setting;

b) The design of new buildings are in keeping with the site and its setting and respect the scale, character and siting in terms of 'setback' of existing and surrounding buildings. The recommendations of the National Design Guide (January 2021) and the more locally specific requirements for Place Shaping and Heritage (Dev 20-22) of the JLP SPD 2020 are followed.

c) High quality materials are used for buildings and hard landscape designs that complement the local and traditional palette of materials found within Kingsbridge, West Alvington and Churchstow.

d) Street furniture design respects the style and precedents set by the town, parish councils and Kingsbridge in Bloom.

e) It has regard to the requirements of CPtED and 'Secure by Design' to minimise the likelihood and fear of crime and acts of anti-social and unacceptable behaviour and community conflict in the built environment;

f) It reduces the dependence on the private car by supporting and connecting directly to other more sustainable modes such as walking, cycling and public transport.

g) As outlined in JLP SPD 2020 prominent and strategically important schemes of all scales should be considered at an independent, bespoke Design Review Panel. This is of particular importance where proposals impact on the AONB and heritage assets.

<p>2. The subdivision of existing plots will only be supported where there is no loss in character or environmental quality of the surroundings, there is suitable highway access on at least one boundary, plot and unit sizes are comparable with adjacent properties, adequate amenity space is provided, and the amenity of adjoining properties is not compromised.</p> <p>3. Proposals should seek to avoid damage to and retain existing trees and hedges in situ. Development proposals will be encouraged to provide no net loss in trees with the aim for more trees on site and achieve biodiversity net gain. Where retention is not feasible, trees and hedges should be replaced with provision elsewhere on site.</p>	
<p>Policy KWAC BE4 Safeguarding Designated and Non-Designated heritage assets within the Plan area and the conservation areas of Kingsbridge and West Alvington</p> <p>All proposals in the conservation areas and in the vicinity of Designated and Non-Designated Heritage Assets must comply fully with National Planning Policy the Development Plan and associated SPD (2020) relating to the Historic Environment and:-</p> <p>a) Give due regard to the asset and demonstrate an awareness of the Devon Historic Coastal and Market Towns survey (DHCMTS) and the Historic Urban Character Areas (HUCA) for Kingsbridge produced by Devon County Council and English Heritage which is included as Appendix B13. Due consideration should be given to the historic character of the area within which a proposal sits.</p>	<p>As indicated in the Council’s Regulation 14 comments this Policy need not repeat the National and Policy protection already afforded to Designated Heritage Assets. The weight afforded, in the consideration of Designated Assets, differs from that afforded to Non Designated Assets. The Policy does not distinguish between the two.</p> <p>Criterion a) reference to the various documents which supports the content of this Policy is better placed in the justification of this Policy.</p>

b) Where relevant, include design features such as setbacks, stone or render walls and roof details that reflect the character and appearance of the surrounding buildings.

c) For extensions, new doors, windows and roofing materials should be of a similar appearance to those used in the construction of the exterior of the original building.

Proposals that directly or indirectly affect the significance of Designated Heritage Assets included in Appendices B20 and B21 the Non-Designated Heritage assets and described below and illustrated in Appendix A5 and Figure 26 should be judged according to the scale of any harm or loss and the significance of the asset to the parishes.

Kingsbridge

KLHA1 Duncombe Villa, Duncombe Street

KLHA2 Bernagh, Duncombe Street

KLHA3 British School, Church Street

KLHA4 Recreation Ground / Saltmill Quay

KLHA5 Lime Kiln Tumbly Hill

KLHA6 Railway Bridge, Plymouth Road

West Alvington

WALHA1 Ring O' Bells Public House

WALHA2 Well, Lower Street

WALHA3 Parish boundary marker, West Alvington Hill

WALHA4 Hitching hook, Lower Street

WALHA5 Collapit Bridge

WALHA6 Public footpath sign, Littlecroft, Main Street

WALHA7 Gate piers, Easton Farmhouse

WALHA8 Millstone, Longbrook Farm

<p>WALHA9 Conflict Arborglyphs, West Alvington Wood WALHA10 Former buttery, Collapit WALHA11 Former dairy, Main Street.</p> <p>Churchstow CLHA1 Village water pump, Pump Lane CLHA2 Home Farm Cottage and Thatcher’s End CLHA3 Railway tunnel from Sorley Farm to Coombe Farm CLHA4 Telephone box, Churchstow CLHA5 Churn stand outside the Post Office Stores CLHA6 Church Hall, Pump Lane</p>	
<p>Policy KWAC T1 Sustainable Transport routes New development in the Plan area should where possible link to a safe footpath network that connects the Parishes, and surrounding settlements. Where appropriate opportunities to improve and extend the existing network will be sought as part of any development proposals. Opportunities will be sought to upgrade footpaths to bridleways to allow cycling and horse riding in consultation with landowners. All footpaths should; -</p> <ul style="list-style-type: none"> a) Have durable surfacing and effective drainage; b) Be easy to navigate with improved waymarking through discreet rural signage; c) Be accessible to those with special needs where feasible; d) Include improved footbridges, removal of stiles and replacement with accessible gates where required and acceptable to landowners; e) Protect wildlife habitats as outlined in the Wildlife Resource Map (AppendixB17) and any future revision. 	<p>It was suggested in the Council’s Regulation 14 comments that discussion takes place with relevant SHDC officer’s regarding the content of this Policy.</p> <p>Whilst the Councils supports the provision of sustainable travel routes there a concerns regarding certain aspects of this Policy</p> <ul style="list-style-type: none"> 1.) The control and upkeep of the existing network of footpaths and bridleways is covered by legislation separate from that relating to planning. 2.) Criteria e) sets out proposals for future routes yet presents no evidence to support the list of proposals. 3.) Under criteria e) routes are proposed c), e) and f) that link to villages outside the Plan Area. <p>Furthermore there is no clear indication of how the implementation of this Policy can be linked to development proposals that may be expected to contribute towards its implementation.</p>

<p>Proposed future safe pedestrian and cycle connections once suitable routes are agreed with landowners include but are not limited to; -</p> <ul style="list-style-type: none"> a) Churchstow to Kingsbridge; b) West Alvington to Kingsbridge; c) Kingsbridge to Salcombe; d) Kingsbridge to Bowcombe Creek e) Malborough to West Alvington; f) Thurlestone to West Alvington g) Kingsbridge to Belle Hill playing fields h) Safe pedestrian crossings of the A381 and A379 within the villages that connect to bus stops; i) Off road cycle ways and footpaths including a Salcombe to Kingsbridge multiuse trail and the proposed Primrose Trail and better links to the South West Coast Path. 	
<p>Policy KWAC T2 Non-fossil fuel vehicle hub Proposals to reduce the dependence on fossil fuelled modes of transport will be supported. In the short-term electric cars, bicycles and buses should be accommodated however other sources of fuel are envisaged in the longer term. A hub is proposed on the Kingsbridge Quayside car park. Facilities will include, parking/charging bays, spaces for a car club for short term hire, a transfer interchange from bus/bike/car, cyclist shower and changing facilities and an information point. Electric vehicle charging points will be supported for all off-street car parks including the Cattle Market, Duncombe Street, Fore Street, Lower Union Road, Quayside and Churchstow village car parks.</p>	<p>No comment.</p>
<p>Policy KWAC T3 Car Parking a) Proposals which generate an increase in on-street car parking will be resisted, unless designed as part of an overall parking strategy within a development.</p>	<p>Criteria a) and b) are over restrictive and lack the flexibility that different circumstances require.</p>

<p>b) No development will be supported within the Plan area that causes a significant loss in the number of public car parking spaces. If the introduction of new and improved community uses within public car parks requires the relocation of spaces, there should be no reduction in their convenience and proximity to the village centres and town centre.</p> <p>c) New residential development including sheltered housing must, as a minimum comply with adopted parking standards ensuring there is no increase in on-street car parking. Where achievable the indicative parking standards set out in the JLP SPD (2020)¹⁶ should be met; - 1 bedroom 1 space plus 1 space per 3 dwellings for visitors; 2 bedrooms 2 spaces; 3 or more bedrooms 3 spaces.</p> <p>d) New car parking proposals which adversely affect the setting of a development and surrounding landscape features will be discouraged;</p> <p>e) Provision of car spaces and charging points for electric vehicles and other ultralow emission vehicles will be supported.</p> <p>f) To assist in the reduction of on street parking a village car park is proposed in Churchstow (capacity 10 cars). The location of the proposed community car park which is the subject of a Section 106 agreement on the development of Reeves Way is illustrated in Figure 30.</p>	<p>Criteria c) there is no need to repeat the JLP SPD car parking standards and concern that sheltered housing has been singled out as a “special case.”</p>
<p>Policy KWAC T4 Traffic calming Sustainable solutions to calm traffic through the villages and town are supported. Measures supported include; -</p>	<p>As indicated in my Pre Reg 14 comments Devon CC Highways should be consulted specifically on this Policy. I believe the issues covered by the Policy would be more appropriately addressed as a Community Aspiration</p>

<p>a) Reduction of road speeds through West Alvington and Churchstow;</p> <p>b) The introduction of pedestrian crossings in West Alvington, Churchstow and additional crossings in Kingsbridge (Cookworthy Road, Northville Park, Stentiford Hill)and South Hams Hospital);</p> <p>c) Measures to discourage Pump Lane, Churchstow being used as a 'rat run';</p> <p>d) Safer pedestrian access at narrow points in the villages and Kingsbridge to Bowcombe/New Bridge.</p>	<p>since the provision of or dealing with the issues identified are highway management matters not land use planning issues.</p>
<p>KWAC Inf 1 Broadband Infrastructure This Plan supports the provision on site infrastructure for the installation of, and allow the future upgrade and maintenance of, fibre optic broadband technology.</p> <p>a) All development is required to submit a connectivity statement to set out the proposed broadband provision. The statement shall include which broadband supplier(s) can provide full fibre or fixed wireless coverage to the development to provide gigabit capable broadband provision.</p> <p>b) On sites of 10 dwellings and over and on all non-residential sites, all new properties must be served with an appropriate open access gigabit capable fibre optic infrastructure to enable high speed and reliable broadband connection in accordance with national and local objectives to increase coverage.</p> <p>c) On sites of under 10 dwellings all new properties shall be served with an appropriate open access fibre optic infrastructure to enable high speed and reliable broadband connection unless there is evidence which</p>	<p>No comment.</p>

<p>demonstrates that providing the required infrastructure is not feasible or economically viable.</p> <p>d) Installed infrastructure should allow all premises that form part of the approved development to access superfast or better broadband prior to occupancy.</p> <p>e) The creation of a building to act as a fibre hub to enable fibre connections within the area will be supported”</p>	
<p>KWAC HW1 Community facilities The following community facilities have been identified as important to the vitality, health and wellbeing of the community; -</p> <ul style="list-style-type: none"> a) Kingsbridge Hospital b) Norton Brook Medical Centre c) Kingsbridge Library d) Kingsbridge Leisure Centre e) Quay House f) The bandstand g) Tourist Information Centre h) Public toilets i) Harbour House j) Cookworthy Museum k) Tresillian l) The churches of the town (St. Edmunds, St. Thomas a Becket, Dodbrooke ,Methodist Church, Evangelical Church, Family Church, Sacred Heart) m) All Saints Church, West Alvington n) Saint Mary the Virgin Church, Churchstow o) Kingsbridge Town Hall/ Cinema p) Market Hall q) Memorial Shelter, Embankment Gardens r) Post Office, Fore Street s) Banks (Lloyds and NatWest) 	<p>There are concerns regarding the number, breadth and nature of some of the community facilities identified in this policy. For this reason, in this instance, the Council requested (at Regulation 14) that the owners be specifically consulted. No evidence has been presented that such a consultation has taken place.</p>

<p>t) Scout Hut u) West Alvington village hall and car park v) Churchstow Church Hall w) Churchstow village shop and Post Office</p> <p>Development that results in the loss of existing community facilities or that results in any harm to their community function, character, setting, accessibility, appearance, general quality, and amenity value will only be supported if they are replaced by community facilities of equal or higher quality, economic viability and value to the community or it can be demonstrated they are no longer needed.</p> <p>The area illustrated in Figure 30 encompassing Kingsbridge Hospital and Norton Brook Medical Centre should be safeguarded solely for health and wellbeing related uses.</p> <p>Where the loss of a community facility is justified as no longer viable the applicant must demonstrate through an independent assessment that the vacant facility has been actively marketed and offered at a reasonable sale price (comparable with valuations achieved elsewhere in the District) for a minimum period of 1 year.</p>	
<p>KWAC HW2 Open Space New residential development will where practicable be expected to deliver any new community facilities including Open Space Sports and Recreation (OSSR) onsite. On smaller sites or where this is not practicable a planning obligation will be sought to mitigate the impact of new residents through new and improved provision in an appropriate location in coordination with the South Hams (OSSR) Study 2017</p> <p>-</p>	<p>Paragraph one: Second sentence: Suggest reference to the additional document (shown in red) is included:-</p> <p><i>“On smaller sites or where this is not practicable a planning obligation will be sought to mitigate the impact of new residents through new and improved provision in an appropriate location in coordination with the South Hams (OSSR) Study 2017 -Quantity, Quality and Accessibility Standard and Plymouth and South West Devon Joint Local Plan Developer Contributions Evidence Base.”</i></p>

<p>Quantity, Quality and Accessibility Standards. Any contribution should be directed towards the projects and priorities set out in the latest Kingsbridge and West Alvington OSSR Plans and emerging plan for Churchstow in liaison with the Local Planning Authority and respective Parish Councils, to confirm which of the listed projects are the priority at that time.</p> <p>Proposals that involve the use of land in the countryside to facilitate and enhance informal recreational activities and access related to the enjoyment and interpretation of the countryside will be supported where they would not have an adverse effect on the countryside, historic environment, and other land uses in the vicinity and would conserve and enhance the natural beauty of the AONB. Any proposals that improve access to existing public rights of way will be supported.</p>	
<p>KWAC HW3 A community centre for Kingsbridge The Plan supports the development of a new community centre for the town. The development to be located within the town shall serve the whole plan area and surrounding parishes. The accommodation shall or in part include, subject to capacity and heritage constraints the following; -</p> <ul style="list-style-type: none"> • Multi-purpose hall for theatre, music performance, sports activities and meetings; • Meeting rooms • Small business hub; • Ancillary/ support facilities; • Provision for all those with special needs. 	<p>No comment on the Policy, however, there is concern at the inclusion of Figure 32 (page 110) entitled “Proposed Locations for Kingsbridge Community Centre” which could be misinterpreted as being part of the Proposals Map. It is suggested that the Plans are clearly marked as “For information purpose only.”</p>

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APPENDIX 1: The Economic Development perspective on key brownfield sites identified in the Kingsbridge, West Alvington and Churchstow Neighbourhood Plan

Station Road Industrial Estate: Identified in Appendices B 14 and B36 as Site B (9): Referenced in Policy KWAC BE1

Station Road Industrial Estate is home to a number of national companies, including Howdens Joinery, Wolseley Plumbing and Tally-Ho! Coaches. It also has a good mix of smaller, local companies, from dog groomers to interior decorators. There are low levels of churn on the site (businesses moving out of units and new businesses moving in), and it has consistently been fully occupied. It has provided stable employment for what is likely to be a significant number of people in Kingsbridge for many years.

There are no other sites in the town where businesses such as these could comfortably be accommodated, and it would not be viable to move them out of town, as the nearby industrial estates are all at similarly high levels of occupancy. Furthermore, this would simply lead to local residents and employees having to make greater numbers of vehicle journeys in and out of the town, as the surrounding areas have relatively poor public transport access and the types of goods sold by these businesses are generally bulky, and not well suited to public transport.

It is therefore recommended that this site be protected for its existing employment uses.

Lower Union Road: Identified in Appendices B 14 and B36 as Site B7): Referenced in Policies KWAC EM2 and BE1

Lower Union Road provides employment space for a wide range of businesses directly adjacent to the town centre. These businesses range from car workshops, to specialist retail units, to restaurants. The site has been developed in an ad-hoc, uncoordinated manner, mostly due the area being in multiple ownership, and each of them having brought premises forward in their own way over many years. There is also an electricity substation in the middle of the site, which is likely to impact on the viability of the area for other uses.

The units range in style and size, with beautiful old stone buildings having plastic signage attached to their walls, metal sheds, and modern timber clad units with large glazed frontages, which further adds to a perception of the lack of coordination of the site resulting in a messy, unattractive development.

The visual appearance of the site does not appear to be hindering the businesses which operate on Lower Union Road, and although there has been some churn of businesses over the past few years, this has not been significant, and there are no vacant premises available at present. There is also a reasonable level of parking available for customers.

In terms of jobs, it is hard to estimate the number of workers on the site, but it is likely to be significant to the town, and is likely to consist of a mix of roles, from low skilled elementary positions, to vocational / technical roles, to high skilled, professional roles.

As with the other sites, it would be difficult to relocate these businesses out of town to estates such as South Hams Business Park (which is full) or to Tor Quarry Industrial Estate (which has no available units that would be suited to the types of businesses found on Lower Union Road), and any relocation would result in greater numbers of vehicle journey for workers.

However, the area would lend itself well to regeneration activities if the funding for such a project could be found. This could improve the perceptions of the site, even if the business mix were to remain the same.

The economic development specialist is not going to comment on the viability of bringing housing into the mix through any regeneration of the site, but would stress that the inclusion of housing there should not result in any loss of employment space.

It is recommended that the site be protected, that any potential regeneration project should protect the level of employment space available at the site, and that any regeneration project for the site should be employment led (i.e. focused on ensuring that the site becomes a better, more attractive employment site).

Garden Mill Industrial Estate: Identified in Appendices B 14 and B36 as Site B3: Referenced in Policy KWAC BE1

While parts of Garden Mill Industrial Estate appear to be in need of some basic maintenance, the site provides suitable space to small businesses which typically wouldn't be desirable in a town centre, but which are well suited to edge of town activities. The estate is tucked away from the main town, and becomes gradually more industrial as it gets further from residential premises, starting with a popular veterinary centre, followed by an IT and a medical business, and ending with carpentry and scrap metal businesses. There are a couple of vacancies on the site, but nothing of any significance, though they would be easier to fill if the site were to receive some basic refurbishment and a general tidy up of the area was undertaken.

It is estimated that Garden Mill provides between 30-50 jobs to local residents, many of which are highly skilled, specialist roles. Though some of the businesses are noisy during their operating hours, the businesses are a valuable asset to the town, and would not be easy to accommodate at other locations.

It is recommended that the site be protected for employment uses, but potential tidied up / refurbished to make it more attractive to businesses which could occupy the few vacant units available.
