

## Salcombe Neighbourhood Development Plan 2018 to 2034

### Consolidated response to the Examiner's further initial comments dated 4<sup>th</sup> March 2018

Comment paragraph	Subject	Response (by the Town Council unless noted by LPA)
4	Response to Reg. 16 comments from the Town Council	See response dated 6/3/19 included as Attachment 1
5	Local Green Spaces	Notifications were made to the land owners with copy letters provided. See email dated 14/ 3 /19 included as Attachments 2,3 and 4
6	LGS 18 and 19	These were deleted from the Submission version of the NDP.
7	European Offshore Marine Site	From LPA ; The Start Point to Eddystone SAC is covered in the HRA Screening Opinion. The site was designated as a Site of Community Importance (SCI) in November 2011. The status changed to a Special Area of Conservation (SAC) on 29th September 2017 There is also an area designated Marine Coastal Zone – but this is a UK not European designation so no relevance to the HRA. For information Natural England were content with this in the Screening Opinion.
8	Affordable Employment Units	<p><b>a)What does the TC consider locally affordable?</b> Please refer to advice provided from a local property agent Antony Stumbles of Luscombe Maye in his email dated 17 3 19 (attachment 5 and email from Chris Brooke COP Lead for Assets of SHDC (attachments 6 and 7).</p> <p>On the basis of this advice we consider a locally affordable rent for a small employment unit of around 50m2 to be around £8 per sq ft.</p> <p><b>b) How would locally affordable be articulated in a S106 agreement and maintained in perpetuity?</b> On the basis of Chris Brookes advice (attachment 6 ) we would recommend that the following text be added to SALC EM1; <i>'To ensure the employment uses remain affordable in line with the local market it is recommended that leases are for short period (between 6 to 10 years). Leases should also contain rent review clauses with the landlord based on an RPI uplift or a market review depending on the particular site, its condition, use, market demand and the length of the lease.'</i> As an alternative a Local lettings Policy could be produced to reflect this (see response to d) below.</p> <p><b>c) Is there information on what local marine related</b></p>

		<p><b>employment uses are prepared to pay and the viability of this?</b></p> <p>Please refer to the responses of Antony Stumbles and Chris Brook (attachments 5,6 and 7) This would indicate that offers of upwards of £6 per sq ft have been made and that this can be viable over £8 per sq ft.</p> <p><b>d)LPA’s Experience elsewhere?</b></p> <p>LPA’s response; In terms of South Hams/West Devon there appears to be no planning mechanism that has been used to control lettings to “local affordable employment”. The LPA’s view is this was best dealt with by a local letting policy and if the Council wishes to promote “local affordable employment” and apply preferential treatment to a specific sector of the economy then it would need to take account of its duty to obtain best consideration in commercial deals and decide whether there was a sufficient argument in law to allow this.</p> <p>A number of business parks within the district such as at Churchstow, Loddiswell, Tor Quarry and in Kingsbridge accommodate marine related uses commanding a rental between £5 and 8 per square ft. However their distance from the water (and their market) means the sites are not ideally suited to these uses.</p> <p><b>f) Other models of affordable employment being promoted?</b></p> <p>In parallel with the Neighbourhood Plan a local group supported by the Town Council has set up the Salcombe Community Land Trust Ltd. The group is investigating the feasibility of delivering both housing and employment sites.</p>
9	Works in the Harbour Estuary SALC Env 5 d) and e)	LPA’s response; The Local Planning Authority control development to the low water mark. We are not aware of any Local Acts that extend, or reduce, that jurisdiction. The harbour infrastructure referred to in SALC Env 5 criteria d) and e) are, to the largest extent, located above and landside of the mean low water mark. As such, policy control over this type of development can legitimately form part of Local or Neighbourhood Plan’s policy content.
10	Local Validation Checklist	LPA’s response ; The website address is as follows:- <a href="https://www.southhams.gov.uk/article/4045/Planning-Validation-Checklists-Local-List-">https://www.southhams.gov.uk/article/4045/Planning-Validation-Checklists-Local-List-</a>
11	Viewpoints outside the plan area SALC Env6 V13 and 14	Noted

12	Figures 13A and 13B and views V 21 and 18	Will amend figure reference in SALC Env 6 and note comments on the views.
13	View point V22	<p>Town Council's response; The importance of the view was because it is the pedestrian route, Onslow Road, from the Park &amp; Ride and in that context an "important view" for the Town's many visitors. The bench was originally suggested as the viewpoint simply because it is a fixed point, but this was before the planting that is now in front of it. If there is a way to maintain the 'locally important view' but re-state / re-position the precise V22 viewpoint, that would be a suitable compromise that would still meet the overall objective but hopefully not conflict with the landowner adjacent to V22. We would welcome your guidance on this.</p> <p>LPA's response; the land in question has been subject of two planning applications:-</p> <p><b>1) Planning Application Code No 1240/16/FUL</b> This planning application, for three dwelling houses, was refused planning permission on 30<sup>th</sup> January 2018. I enclose:-</p> <p>i) Red lined site plan (1st enclosure Attachment 8). NB This site plan is exactly the same as the site plan relating to <b>Planning Application Code No 3262/18/FUL</b> below.</p> <p>ii) Officer's report (2<sup>nd</sup> enclosure Attachment 9).</p> <p>iii) Decision Notice (3<sup>rd</sup> enclosure Attachment 10).</p> <p><b>2) Planning Application Code No 3262/18/FUL</b> This planning application, for two dwelling houses, was reported to Planning Committee on 13<sup>th</sup> March 2019 with an Officer's recommendation of approval. Planning Committee overturned that recommendation and refused the application. I enclose:-</p> <p>i) Red lined site plan (see 1)i) above) the site area is identical for both applications.</p> <p>ii) Officer's report (4<sup>th</sup> enclosure Attachment 11)</p> <p>iii) The Decision Notice has not been issued and will be sent on once available.</p>
14	Joint Local Plan Update	Refer to LPA email to the Examiner dated 20/3/19 included as attachment 12.

Peter Sandover

On behalf of the Salcombe NDP Group

22/ 3/18