

# AVETON GIFFORD NEIGHBOURHOOD PLAN

## Neighbourhood Plan Group's Response to Examiner's Questions for Clarification

*Thank you for your questions, which are reproduced below without alteration.  
Our responses are shown in bold blue italics throughout.*

I am Deborah McCann, the independent examiner of the Aveton Gifford Neighbourhood Development Plan to 2034. I seek clarification on the following policy/supporting information. These questions are directed to the Qualifying Body.

I am seeking additional clarification on:

### **POLICY AG5: DEVELOPMENT AT MILLHAYE AND CHURCH FIELD**

Development is proposed at Millhaye and Church Field. It should demonstrate high quality design that respects the special architectural and historic interest of the Conservation Area and contributes positively to its setting. Development should also seek to conserve and enhance the setting of the Grade II listed farm buildings at Tree Farm to the south of the site.

The development shall include:

- a) About 20 new open market homes on sites 1b & 1c, and in addition about 6 affordable homes (inclusion of self-build homes within this number will also be welcomed, as well as provision for senior living accommodation).
- b) Space for a public car park to the south of the site, with about 30-50 car parking spaces to serve the needs of the village, which shall be laid out and usable for public use before the first house is occupied.
- c) Good safe pedestrian and vehicular access, including good pedestrian circulation within the site, and
- d) suitable and satisfactory drainage and flood prevention measures.

A masterplan shall be prepared for the whole site, including consultation with and involvement of the local community, showing how the whole of the development can be safely and satisfactorily laid out and delivered, and how construction traffic will be able to access the site from its northern edge so as to minimise disturbance.

Development shall not commence until that masterplan has been approved in writing by the local planning authority.

### **Questions**

Having carefully examined the SEA and Site Assessment Reports prepared by AECOM and the together with other supporting documents it would be helpful to have further clarification on the decision to allocate this site.

Aveton Gifford is not identified as a "Sustainable Village" within the adopted JLP, I understand that SHDC carried out an assessment of the sustainability of villages within the South Hams and Aveton Gifford scored well on this assessment. Although there is an affirmation of the sustainability of the village within the plan I have not been presented with an evidence or analysis document setting out the reasons for that conclusion.

*The JLP was amended by its examiners to exclude settlements lying within or partly within the AONB from the list of sustainable villages. In summary this was done because there was insufficient evidence in the JLP to demonstrate that such settlements could necessarily accommodate development without harm to the AONB. It is therefore a matter for neighbourhood plans (or other means) to bring forward local proposals for development with suitable evidence in support. JLP para 5.165 sets out the approach. This is a challenge for local community groups, but the Aveton Gifford Neighbourhood Plan aims to meet the requirements.*

*The SHDC Settlement Assessment Summary spreadsheet is attached. It records the availability of services and facilities across the villages of South Hams. Aveton Gifford scores 40 out of a possible 47 points. Only Dartington (44 points) and Harbertonford (41 points) score higher. Other villages range down to a minimum score of 11 points (Heybrook Bay).*

*Aveton Gifford's high score in the SHDC assessment strongly supports its sustainability, and this is reinforced by the community's desire to see proportionate growth and development.*

*The suitability and acceptability of possible development sites is addressed in the AECOM Sites Assessment Report.*

AECOM identified a potential yield of 31 dwellings from this site in the site analysis report however the recommendation in this report is:

*"Barnfield (Millhaye is referred to as Barnfield in the AECOM site analysis report) is within a suitable location for development, with good access to local amenities and existing connections to the highway network. Key constraints concern potential effects on landscape and villagescape character and the relative biodiversity value of parts of the site, and flood risk issues on the lower parts of the site.*

*"For these reasons, parts of the south eastern section of the site are considered as a suitable potential location for **small scale development** (my emphasis) for the purposes of the Neighbourhood Plan, providing it complements existing character, is sensitive to the ecological value of the area and is not within the areas of site with flood risk issues."*

*Although the AECOM report recommends small scale development on the site, subsequent work indicates that a larger development (as proposed in the plan) is needed in order to best deliver the development required in the village, and that it can be delivered without causing undue harm to local assets.*

*The site (Millhaye and Churchfield) are owned by a family trust who are keen to develop the sites and have signalled their willingness to provide the needed village car park (in memory of their uncle who owned the land). It is considered that delivery of that car park together with affordable homes in line with the targets set out in the JLP will require more than the small scale development recommended by AECOM.*

*It is further considered that the constraints mentioned by AECOM can be satisfactorily dealt with. The lie of the land means that the visual impact of the proposed development will not be significantly greater than would be the case for small scale development in the south eastern parts of the site (as suggested by AECOM). Its location within the valley shields the site from long distance views and it is only prominent at its southern boundary adjoining the main road through the village. The Environment Agency flood maps show*

*that only a relatively small part of the site is liable to flood. Development can be satisfactorily accommodated without encroaching on this area, although it is considered that the car park could be laid out on raised ground using spoil excavated within the site.*

*There is no other site in the village so well placed or able to deliver the development currently required.*

The Housing Needs Surveys do not appear to be accompanied by any analysis of the outputs.

*It was considered that the low response numbers (172 responses) meant that analysis would run the risk of being insufficiently robust. The results were therefore simply presented at face value. However, a very brief analysis is now given here:*

*The survey results indicate, amongst other results, that*

- *14 households presently renting would like to purchase*
- *37 households need to move in the next 5 years*
- *30 households include somebody who will need to move in the next 5 years*
- *29 households identified family of friends who would like to live in the parish (whose highest demand will be for 3 bedroom houses to purchase)*
- *affordable homes are thought to be most needed, although the breakdown between tenures shows support for open market purchase at 53%, open market renting 26%, housing association 46%, shared ownership 50% and self build 45%*
- *the most favoured form of development was small scale*

*It is considered that, of those wishing to purchase or needing to move, some will achieve this while others will find that a change in circumstances will mean that they do not do so. The results do not show how many of these might be seeking an affordable home.*

*The judgement that affordable homes are most needed is likely to be coloured by popular perceptions. However, the results also show that open market purchase is thought to be the housing type most needed.*

*The preference for small scale development is the common response to such a question in most village communities, and in Aveton Gifford is probably also prompted by unfavourable local perceptions of unsympathetic larger scale developments in other villages. However, local opinion regarding specific sites was not sought at this stage in the process, and it is considered that the strong local desire for a car park would have engendered support for a larger site which could deliver that if it had been presented at that stage. Indeed, the site proposed at Millhaye and Church Field has not resulted in local opposition but some support.*

In the AGNP, Page 10- Main Issues affordable housing is identified as the main issue out of 7 with number 7 identified as “smaller dwellings for older people”.

*Affordable housing is commonly placed as the top priority for communities across South Hams. There is no doubt that it is very difficult for locals to access the local housing market and provision of affordable homes is likely to remain a priority concern for the foreseeable future.*

*Aveton Gifford reflects this pattern, but the provision of a village car park is also placed second highest among local concerns. The priority given to the need for smaller dwellings*

*for older people reflects the parish age structure, with the largest age group being those aged 60 or more. It is likely that some of these will wish to downsize but to remain local.*

Please can I have clarification on the following:

- How the need for the quantum of approximately 30 new dwellings across the plan period has been identified.
- *This originally derived from the JLP target figure for the village (around 30 dwellings) which was based on the SHDC settlement assessment. Although that target figure was deleted from the JLP by its examiners, it is still considered to be a good and reasonable estimate of a suitable scale of development to sustain village and parish life and to deliver needed facilities and affordable homes.*
- *The figure is also broadly in line with the historic growth rate of the village.*
- *The plan aims to strike the balance needed in order to secure delivery of the site, delivery of the village car park and delivery of affordable homes in line with JLP targets. The alternative approach (an exception site in line with JLP policy TTV27) is not considered likely to bring forward the needed development, particularly the village car park.*
- Why the Millhay and Churchfield site was chosen to allocate despite scoring less favourably than the other sites considered in the SEA and how this recommendation informed policy AGV 5 and the decision state a figure of approximately 20 dwellings, which is major development.
- *The only sites which performed significantly better in the AECOM report were sites 5 and 6, both of which also feature in the plan.*
- *Site 5 is proposed for the development of 6-8 houses (with an affordable housing contribution); this is the site referred to as Barton Field (site 2 in the plan).*
- *Site 6 is safeguarded in the plan as potential expansion land for school use only. We note that in our response to SHDC's Reg 14 comments it was indicated that this site would be placed outside the settlement boundary but that the submitted plan has failed to make that change. This is a matter we would be happy for the examiner to correct.*
- *Several sites performed similarly to Millhay and Churchfield, but none is so well placed to deliver the amount of development required and also enable the provision of a car park for the village.*
- How the quantum of development for the Millhay site was arrived at and has the viability been tested in terms of delivering affordable housing and the community carpark.
- *The quantum of about 20 dwellings and about 6 affordable homes was based on the AECOM assessment of site capacity (31 homes), tempered by the site constraints and the desire to enable provision of the village car park.*
- *The community does not have the resources to commission viability assessment, but the family trust who own the land have indicated that they wish to develop it including provision of a car park for the village.*

- How the delivery of 6 affordable homes on the Millhaye and Churchfield site addresses the identified priority issue of affordable housing across the plan period.
- *Because it is a site proposal in the plan the number of affordable homes is constrained by JLP policy. The proposal accordingly follows the 30% target set by JLP policy DEV8.*
- *We accept that JLP policy DEV8 affords scope to seek one or two more affordable homes on the site (7.8 is 30% of 26), and the inclusion of the word “about” within the policy recognises this. The examiner may wish to amend the figures to accord more exactly with JLP policy (say, about 19 open market and about 7 affordable homes) and we would accept such a change. However, we do want the site to come forward and the car park to be delivered and do not want the balance to tip so far as to reduce that likelihood.*
- *Although a higher number of affordable homes might be secured if the site were to be advanced as an exception site under policy TTV27 it is considered that such an approach would be likely to result in the site not being released and therefore neither any housing nor a car park being provided.*
- *Should a suitable exception site also come forward then this might contribute further towards meeting local needs for affordable housing.*

In addition, the policy refers to “sites 1a & 1b” although this is not reflected on the “Proposed Development Sites” map on page 20 of the AGNDP.

*We accept that this is an inconsistency which ought to be rectified, and note that para 59 of the plan compounds the problem by also referring to site 1c. The examiner may care to require that the map be amended to show Millhaye as site 1a and Church Field as site 1b, also deleting reference to site 1c in para 59.*

*We are grateful for the opportunity to address the questions raised by the examiner and trust that our responses will be helpful in making progress.*

*Aveton Gifford Neighbourhood Plan Group*

*June 2020*

*The SHDC Settlement Assessment and our earlier Evidence Paper to support the choice of development sites included in the plan (October 2019) are attached and should also be referred to.*

Deborah McCann BSc MRICS MRTPI Dip Arch Con Dip LD  
 Planning Consultants  
 NPIERS Examiner  
 CEDR accredited mediator