

Mike Fice
Salcombe Town Council
Cliff House,
Cliff Road,
Salcombe
Devon,
TQ8 8JQ

Neighbourhood Plan Consultation

29th March 2018

Dear Councillor,

Further to your letter of 2nd February and the draft Neighbourhood Plan, Age UK Objects to the proposed designation of the grounds at Woodcot as Local Green Space referenced as LGS18 and LGS19 within the draft plan.

To be clear, the areas of land proposed are already:

1. An Area of Outstanding Natural Beauty (AONB)
2. Undeveloped Coast
3. Heritage Coast
4. The curtilage of a Grade II* Listed Building of national heritage importance (including its setting)
5. Entirely covered by Tree Preservation Order 86 protecting all trees therein.

Therefore, the land has 5 tiers of policy and statutory protection maintaining its scenic beauty and open characteristics.

The Neighbourhood Plan now intends to add a further tier of protection.

Government guidance is clear that 'If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.' (Govt Guidance - Open space, sports and recreation facilities, public rights of way and local green space, March 2014).

Age UK question what additional community purpose is being achieved by designating Woodcot's grounds as LGS?

Age UK
Gifted Housing Service **t** 01225 447800
37 St Kilda's Road **f** 01225 447337
Oldfield Park **e** ghs@ageuk.org.uk
Bath BA2 3QJ **www.ageuk.org.uk**

Patron of Age UK: HRH the Prince of Wales

The Salcombe Neighbourhood Plan proposes 26 Local Green Spaces. They are largely open to public access and most are in public ownership already. Conversely, these are private gardens owned by the charity and there is likely to be a public perception that Local Green Spaces equates to public green spaces.

The National Planning Policy Framework

Para 77

The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves*
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife*
- where the green area concerned is local in character and is not an extensive tract of land*

To comply with LGS requirements, the land must be demonstrably special. To demonstrate the specialness of the land, Salcombe Neighbourhood Plan have explained their approach in Appendix 3. It states:

LGS18

Located across Bennett Road from LGS 17. This is a continuation of the green canopy dropping steeply between Bennett Road and Cliff Road. It is similarly an area of great significance in the heart of several of our locally important views and contributes the local landscape character of "wooded hillsides" running down to the banks of the estuary. There are several mature trees with TPOs. The site has a footpath running through it and is important for local wildlife. It borders the Salcombe to Kingsbridge SSSI and RIGS.

And;

LGS19

The land comprising woodland and gardens is the backdrop to and the setting of a Grade 2* listed property which is a retirement home run by Age Concern. It is listed under the Planning Act of 1990 for its special architectural or historic interest. (List entry number 1212788). There are many mature trees and is at the heart of several locally important views. The site links by footbridge to the Salcombe to Kingsbridge SSSI and RIGS. The gardens host many fund raising events over the year and an important green asset for the elderly of the town

Salcombe to Kingsbridge SSSI and RIGS. The gardens host many fund raising events over the year and an important green asset for the elderly of the town

The Appendix states that it is 'an area of great significance in the heart of several of our locally important views'. This reference is to Policy Env6 of the draft Neighbourhood Plan and the 21 important views shown therein. Woodcot is only significant in one view – V14 from Millbay, and possibly obliquely on the water approach and from East Portlemouth.

Age UK agree that the grounds and gardens are important in the landscape and that is why they are part of the AONB, Undeveloped and Heritage Coast. The reference to wooded hillsides is also noted and the grounds have an area Tree Preservation Order that will keep them that way.

The LGS18 statement says there is a footpath running through the land, but this is private. There is no public access to the land. It is also stated that the land borders (sic) a SSSI and RIGS, but there is a public highway in between the two and the SSSI begins far down the coastal slope, therefore it is not adjacent and this statement is incorrect.

With regards to LGS19, Woodcot is run by Age UK and not Age Concern. It is **not** a retirement home as stated, but 10 independent flats leased by older people. Again, the Appendix incorrectly refers to being in the heart of several locally important views.

Age UK are particularly concerned by the terminology in Appendix 3 of the gardens being 'an important green asset for the elderly for the town'. They plan two open days and an occasional charity fund raiser, but do not 'host many fund raising events over the year'. Again these justifications are false and elaborated.

These concluding statements provide a picture in the Neighbourhood Plan of a public garden for older people and regular public access events. This is incorrect and purposefully elevates the community importance of the grounds with a mind to achieving LGS status.

To be clear, Age UK accept that the grounds are in a beautiful location and this is reflected by their multi-tiered protection as AONB, Undeveloped Coast, etc. But the Neighbourhood Plan must recognise that Local Green Space is not a panacea for adding yet another level of protection onto private gardens that are not run as an important asset for the older people of Salcombe.

They are the grounds of 10 residential flats in a Grade II* Listed Building that Age UK allow the residents to kindly open up on occasion as an act of local benevolence and for the purpose of fundraising.

It is apparent that the evidence base used by the Neighbourhood Plan to justify including these areas in the Plan as LGS is faulty. If corrections are made, then there is little case for these grounds being LGS apart from their landscape value. They would be the only such private gardens in the LGS list, where there are dozens of private grounds omitted, for example the grounds that cascade to the foreshore

from Cliff Road. One could argue these are more visible and just as important to the local community, why have they not been included in the LGS list?

Finally, although the NPPF is clear that private land can be Local Green Space, it is common practice for the majority of LGS to be publicly accessible land. That is evident from the other designations. Age UK feel that designation gives the wrong impression about what is a private garden to a set of flats. The charity has been generous in its allowance of public access, but does not want to feel that we cannot risk more access which will impact on safety, peace and security of residents, cause tensions in relation to parking and put safety of visitors at risk and additional costs of protecting health and safety of visitors if numbers increase. This would likely to be reflected in a reticence to allow public access in the future.

Age UK therefore object to the proposals and kindly request that LGS18 and LGS19 are removed from the Neighbourhood Plan.

**Helen Duckworth
National Manager, Gifted Housing
On Behalf of Age UK**

Appendix

Relevant Government Guidance (March 2014)

Open space, sports and recreation facilities, public rights of way and local green space

What if land is already protected by designations such as National Park, Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area?

Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

What types of green area can be identified as Local Green Space?

The green area will need to meet the criteria set out in paragraph 77 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

How big can a Local Green Space be?

There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.

Does land need to be in public ownership?

A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.



Justin Davey

From: Geoffrey Duggan
Sent: 07 December 2018 08:39
To: Sarah Packham
Subject: FW: EXTERNAL:Salcombe Neighbourhood Plan

Geoff Duggan | Digital Mail & Print Team Member
South Hams District Council | West Devon Borough Council
Email: geoffrey.duggan@swdevon.gov.uk
Tel: 01803 861214



www.southhams.gov.uk



www.westdevon.gov.uk

From: Spectrum Licensing [mailto:Spectrum.Licensing@ofcom.org.uk]
Sent: 07 December 2018 01:31
To: Geoffrey Duggan <Geoffrey.Duggan@swdevon.gov.uk>
Subject: RE: EXTERNAL:Salcombe Neighbourhood Plan

Dear Sir/Madam

Thank you for your request for information on Fixed Links with respect to Wind Farm Planning.

Provision of this information is currently under review to ensure compliance with GDPR Legislation.

Fixed Link information is available on the Ofcom Website at the following location:
<https://www.ofcom.org.uk/spectrum/information/spectrum-information-system-sis/spectrum-information-portal>

Please accept our apologies for any inconvenience.

Regards
Spectrum Management Centre

From: Geoffrey Duggan <Geoffrey.Duggan@swdevon.gov.uk>
Sent: 30 November 2018 11:18
To: Spectrum Licensing <Spectrum.Licensing@ofcom.org.uk>
Subject: EXTERNAL:Salcombe Neighbourhood Plan

Please reply to: Neighbourhood Planning
Address: South hams District Council
Follaton House, Plymouth Road
Totnes, TQ9 5NE

E-Mail: NeighbourhoodPlan@swdevon.gov.uk

29 November 2018

As a consultee to the Salcombe Neighbourhood Plan, I am writing to you; In accordance with regulation 16 of the Neighbourhood Planning regulations to inform you that we have now received the Salcombe Neighbourhood Plan proposal.

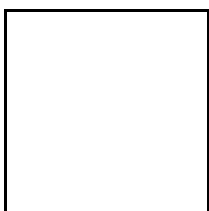
We will formally consult on this document for a period of 6 weeks from 30th November 2018 until 11th January 2019 before making a formal decision as to whether we should instruct an independent examiner to carry out the examination.

You may view a copy of the plan via our website <https://www.southhams.gov.uk/article/3882/Neighbourhood-Development-Plans-and-Orders> or by getting back in touch with us via the details above.

Yours sincerely

S. Packham

Neighbourhood Planning
South Hams District Council and West Devon Borough Council



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Justin Davey

From: Geoffrey Duggan
Sent: 04 December 2018 11:43
To: Sarah Packham
Subject: FW: Salcombe Neighbourhood Plan

Importance: High

Geoff Duggan | Digital Mail & Print Team Member
South Hams District Council | West Devon Borough Council
Email: geoffrey.duggan@swdevon.gov.uk
Tel: 01803 861214



From: Garnier, Chrystèle [mailto:Chrystele.Garnier@highwaysengland.co.uk]
Sent: 04 December 2018 11:37
To: Geoffrey Duggan <Geoffrey.Duggan@swdevon.gov.uk>
Subject: RE: Salcombe Neighbourhood Plan
Importance: High

Dear Geoffrey,

Thank you for providing Highways England with the opportunity to comment on the Salcombe Neighbourhood Plan proposal. We have responsibility for operating, maintaining and improving the strategic road network (SRN) which in this case consists of the A38 some distance to the north of the plan area.

In terms of the proposed policies within the Neighbourhood Plan, we are satisfied that these are unlikely to impact on the SRN and we therefore have no further specific comments to make. This response does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.

We welcome your group's aim of maintaining a sustainable neighbourhood and wish you every success in the delivery of your Neighbourhood Plan.

Regards

Chrystèle Garnier, Administrator
Performance Assurance & Business Services Team
Highways England | Brunel House | 930 Hempton Court, Aztec West | Bristol | BS32 4SR

From: Geoffrey Duggan [<mailto:Geoffrey.Duggan@swdevon.gov.uk>]

Sent: 30 November 2018 11:17

To: Highways England <info@highwaysengland.co.uk>

Subject: Salcombe Neighbourhood Plan

Please reply to: Neighbourhood Planning
Address: South Hams District Council
Follaton House, Plymouth Road
Totnes, TQ9 5NE
E-Mail: NeighbourhoodPlan@swdevon.gov.uk

info@highwaysengland.co.uk

29 November 2018

As a consultee to the Salcombe Neighbourhood Plan, I am writing to you; In accordance with regulation 16 of the Neighbourhood Planning regulations to inform you that we have now received the Salcombe Neighbourhood Plan proposal.

We will formally consult on this document for a period of 6 weeks from 30th November 2018 until 11th January 2019 before making a formal decision as to whether we should instruct an independent examiner to carry out the examination.

You may view a copy of the plan via our website

<https://www.southhams.gov.uk/article/3882/Neighbourhood-Development-Plans-and-Orders> or by getting back in touch with us via the details above.

Yours sincerely

S.Packham

Neighbourhood Planning

South Hams District Council and West Devon Borough Council



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<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

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Salcombe Neighbourhood Plan – salcombeplan.org

Ref: Proposal to include the view from a public bench at the junction with Onslow Road and Piggy Lane as being a “Locally Important View”. Identified as V22.

We wish to challenge this decision and want to object in the strongest possible way to the seemingly undemocratic inclusion of this claimed view in the Salcombe Neighbourhood Plan.

The website for the Salcombe Neighbourhood Plan, salcombeplan.org has just four main headings. Those being : -

1.Home, 2. Community Action, 3. Steering Group and 4. Regulation 14 draft and consultation responses.

The current regulation 14 draft document accessed on this website clearly shows that the claimed view from this bench is not identified or included in the map of locally important views.

However when you scroll down through the website a newly submitted version is now available for viewing. This was submitted on 12th October 2018.

In this document it is claimed that the view from the bench is of local importance and has been amended and included in the updated version. This is factually inaccurate.

The website also advises that a Regulation 16, six week consultation period will be carried out, with an expected commencement date of Monday 29th October, at the time of writing this submission (20 November 2018) no such information has been confirmed on the website.

Our issue with this is the way in which this item has been allowed to be included with little or no information being provided as to how this decision has been made.

Without thorough scrutiny of the document this issue could have been ratified unchallenged due to the ‘discreet’ process used to amend and include additional views, over and above those identified in the regulation 14 draft document.

The website refers to the document being “supported by a wide range of well researched evidence”.

The inclusion of the claimed view from the bench on Onslow Road certainly cannot have been included based on a wide range of well researched evidence.

Quite simply we can confirm that there is indisputably no view that can be seen from the claimed viewpoint. We own the land over which any claimed view would be borrowed. We have intimate knowledge and photographic evidence stretching back over 90 years supporting this statement. In late 2017, during the processing of a planning application on our site, objectors took it upon themselves to drastically cut our boundary hedge, in an attempt to manufacture a point of objection to our proposals. For a short period of time (No more than a few months) the damaged hedging provided inadequate screening to our privacy. This was quickly rectified by allowing the hedge to re-grow and supplementing the hedge with additional vegetation.

We would invite anyone to establish this fact for themselves, by making a site visit, sitting on the bench and judging for themselves if the claimed view is possible, it simply does not exist.

On that basis alone we would request that the proposal to include this view should be overturned and the original regulation 14 map be reinstated, with regards to the specific case of the claimed view from the bench on Onslow Road.

When referencing the feedback from the Pre-submission consultation it is evident that there were just three responses requesting the inclusion of the claimed view from this bench, those three being submitted by Mr Martin Ryall; Ms Kirsty Lamont and Mr Robert Wheeler. All known associates, and in the case of Messers Wheeler and Ryall having a vested interest in this matter, both having opposed our planning application on a personal basis.

Mr Wheeler was a lead protagonist in opposing our lawful application to develop our property, he submitted numerous letters of representation objecting to our proposals, including many unsupported comments about the view from the bench seat. The only evidence provided by Mr Wheeler was a photograph taken in 1975, 43 years ago, showing a view looking west up Onslow Road, after a heavy fall of snow. In the corner of the image the bench can be seen orientated towards the north-east. It did not however show what the view from that bench was at that time, nor did it show the boundary screening to our property.

We have copious images of the boundary planting and the overgrowth of the area directly in front of any claimed view, over a very significant period of time. We are convinced that the photographic evidence we can provide proves conclusively that the claimed view has not existed for more than 40 years. It is only the opportunistic and potentially criminal actions of objectors to our proposals, taking advantage of the potential for a view following the clearance of our site, that has allowed any temporary view to be considered, following the unlawful cutting of our boundary planting. This fact was referenced by the Councils planning officer.

These three responses do not in any way represent the community as identified by Cllr Judy Pearce in her consultation response.

The photographic view published in the revised document is grossly inaccurate and misleading (Page50. Fig 14B.)

The listing clearly states the view is from the bench seat, whereas in reality the image identified above is taken from an elevated position and viewpoint, being approximately 3 metres above the claimed viewpoint and significantly behind the bench position, having been taken from the southern side of Onslow Road. This viewpoint is not available to any member of the public. Therefore the photographic view as submitted is misleading and based on an untruth. It is also a photograph taken at the time of the potentially criminal damage caused to our boundary planting. It is therefore outdated and any subsequent site inspection would confirm that now **this view simply does not exist.**

The references made by Mr Wheeler to our previous planning application in his submission (Page13 of 88 of the feedback from the pre-submission consultation) are heavily edited comments from a planning report, written by one planning officer. For completeness we have included the remainder of the statement, which we trust gives a more honest and balanced opinion.

In addition to the text referred to by Mr Wheeler, the planning officer goes on to say that the view is though '...dependent on the application site, and an intervening area of unregistered land, (*over which the council has no authority or rights*) over which any long-ranging views are borrowed. If trees are allowed to grow back on the application land, public views could once again become obscured over time.

This is now the situation and any potential for a view has been removed.

Clearly the planning officer was obliged to comment on the situation as it existed at the time of his inspection. As the cutting of our boundary planting was undertaken to coincide with the

determination date of our application, a partial view, to a very limited degree was visible for a very brief period of time. However the damaged planting has now been reinstated and the view categorically does not exist.

For the following reasons we would ask that view V22 be removed from the Salcombe neighbourhood plan.

1. The claimed view does not exist. Site conditions and visits will confirm this.
2. The photographic image used is misleading and factually inaccurate. It is not taken from the bench seat, and is not available from any public viewing position.
3. The comments from three associated objectors, disagreeing with the neighbourhood plan does not constitute a community viewpoint.
4. The temporary view that could be claimed as at December 2017, (due to unauthorized cutting of boundary screening) had not existed previously for in excess of 25 years, if not longer. Maybe as much as 45 years. Comprehensive and conclusive photographic evidence can be provided to support this claim.
5. This is a contrived attempt to effect local policy by those opposed to our lawful right to seek planning permission on land in our ownership. We trust that after reference is made to a wide range of '*well researched evidence*' not just the opinion of three objectors, then the facts of the matter can be established and this falsely claimed locally important view can be removed from the Salcombe neighbourhood plan.
6. It is interesting to note that the revised regulation 14 draft was submitted to the District Council on 12th October 2018, just 10 days after we submitted a revised planning application on 2nd October 2018. At the present time there is no published advisory information or identified process to challenge these amendments and this does not seem democratic or equitable.
7. The neighbourhood plan in its current revised form contains inaccurate and misleading information, as such it cannot be ratified and we would ask the independently appointed examiner to uphold our request to reverse the previous amendment of this item.

Please accept this correspondence as our official request to review this matter. We await your responses with interest. Should you need sight of photographic evidence supporting our stance with reference to the historic situation, relating to the non existence of this view over a very long period of time, then please do not hesitate to request further information.

Please advise us of the actual period of (regulation 16) consultation and who the lead officer is in relation to our requests. We would appreciate the distribution of this request to all members of the Neighbourhood Steering Group, so that information can be disseminated down to the appropriate contributors.

Thank you for considering our representation.

Yours faithfully,

Martin King.

Joint owner of land adjacent to claimed view V22



Date: 23 January 2019
Our ref: 268227
Your ref: Salcombe Neighbourhood Plan



FAO Sarah Packham
Neighbourhood Planning
South Hams District Council

neighbourhoodplan@swdevon.gov.uk
C.c. Geoffrey.duggan@swdevon.gov.uk
Duncan.smith@swdevon.gov.uk

Customer Services
Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Ms Packham

Planning consultation: Salcombe Neighbourhood Plan (revised version), Regulation 16 consultation.

Thank you for your consultation on the above dated 19 December 2018

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the preparation of the Neighbourhood Plan and recognise the effort that has gone into its development. This response should replace our previous response dated 16 January 2019 which quoted the policy wording of policy SALC Env 5(e) incorrectly.

Settlement boundary. We welcome the clarification regarding the settlement boundary, shown in fig 1B, and note that this now reflects the settlement boundary set out in the adopted South Hams Local Development Framework (plan ID:SHDC1 K3).

Policy SALC Env 5(e) Maintaining the character and environmental quality of the estuary. Clause 5(e) states that "No extensions of existing permanent pontoons within the historic settlement at Whitestrand, Normandy, Victoria Quay, Shadycombe Creek and Batson will be supported without clear justification and support from the Salcombe Harbour Board. There should be no net loss of foreshore or seabed in any future development. For the avoidance of doubt this Plan will not support any pontoons South of Jubilee Pier." For clarity the location of the existing permanent pontoons and the location of Jubilee Pier should be shown on a Plan. We welcome the inclusion of new clause (h) in policy SALC Env 5 which states that there should be no adverse impact on the Salcombe to Kingsbridge SSSI.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Carol Reeder on 0208 225 6245/07721 108902 or carol.reeder@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Carol Reeder
Lead Advisor
Devon, Cornwall & Isles of Scilly Team
Natural England
Polwhele
Truro
TR4 9AD



Justin Davey

From: Developer Services Planning <DeveloperServicesPlanning@southwestwater.co.uk>
Sent: 20 December 2018 14:28
To: SW-Neighbourhood Planning
Subject: RE: Salcombe Neighbourhood Plan

Sarah thanks for the update – we have no further comments to those made (below) in respect of the original and now withdrawn plan.

Thank you for providing details of the above the content of which is noted and upon which South West Water has no comment other than to confirm the anticipated level of housing/employment use can be accommodated.

Regards

Martyn Dunn Development Coordinator



South West Water

D: 01392 443702

Peninsula House, Rydon Lane, Exeter, EX2 7HR
www.southwestwater.co.uk

Please note that the Water Act 2014 has brought in changes that mean that all water companies are being asked to modify the way they [charge customers for Developer Services related activities from April 2018](#).



From: Geoffrey Duggan [mailto:Geoffrey.Duggan@swdevon.gov.uk]
Sent: 19 December 2018 10:42
To: Developer Services Planning
Subject: Salcombe Neighbourhood Plan

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Working together



Service: Neighbourhood Planning
E-Mail: neighbourhoodplan@swdevon.gov.uk

18th December 2018

South West Water

Dear Consultee,

I wrote to you on 29th November 2018 regarding the regulation 16 consultation on the Salcombe Neighbourhood Plan (the Plan) which was to run between 30th November 2018 and 11th January 2019.

On 6th December 2018, Salcombe Town Council wrote to the Council to formally **WITHDRAW** that version of the Plan and the submitted Basic Conditions Statement.

On 18th December Salcombe Town Council submitted a revised version of the Neighbourhood Plan and the Basic Conditions Statement under regulation 15.

In terms of the Plan the only alteration is the substitution of the originally identified settlement boundary (Figure 1B) with a revised settlement boundary. The revised settlement boundary is that identified in the current Development Plan (South Hams Local Plan 2011). The Basic Conditions Statement has been altered in respect of the SEA/HRA Screening Opinion taking full account of comments made by Natural England since its original submission.

As a consultee to the Salcombe Neighbourhood Plan, I am writing to you, in accordance with regulation 16 of the Neighbourhood Planning regulations, to inform you that we have now opened consultation the revised version of the Salcombe Neighbourhood Plan.

We will formally consult on this document for a period of 6 weeks from 18th December 2018 until 29th January 2019 before making a formal decision as to whether we should instruct an independent examiner to carry out the examination.

You may view a copy of the plan via our website <https://www.southhams.gov.uk/article/3882/Neighbourhood-Development-Plans-andOrders> or by getting back in touch with us via the details above.

Yours sincerely

S.Packham

Neighbourhood Planning
South Hams District Council and West Devon Borough Council

South Hams
Tel: (01803) 861234
Fax: (01803) 866151

West Devon
Tel: (01822) 813600
Fax: (01822) 813634

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Registered Office:
Peninsula House
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Justin Davey

From: SW-Neighbourhood Planning
Sent: 04 December 2018 11:41
To: Nicholas.Pook@Westwardhousing.org.uk
Cc: SW-Neighbourhood Planning
Subject: RE: Salcombe Neighbourhood Plan

Hi Nick,

Apologies if this has come to you in error however we have a statutory duty to contact any previous consultee the Neighbourhood planning group have advised us of at regulation 16 stage of the neighbourhood planning process.

If you have no property in the Salcombe parish boundary or would look at build any homes there then I would suspect that no comments would be necessary.

Many thanks

Sarah Packham | Neighbourhood Planning Senior Case Manager
West Devon Borough Council | South Hams District Council

Working days - Tuesday, Wednesday, Thursday



www.southhams.gov.uk



www.westdevon.gov.uk

From: Geoffrey Duggan
Sent: 03 December 2018 13:31
To: Sarah Packham <Sarah.Packham@swdevon.gov.uk>
Subject: FW: Salcombe Neighbourhood Plan

Geoff Duggan | Digital Mail & Print Team Member
South Hams District Council | West Devon Borough Council
Email: geoffrey.duggan@swdevon.gov.uk
Tel: 01803 861214



www.southhams.gov.uk



www.westdevon.gov.uk

From: Nicholas Pook [<mailto:Nicholas.Pook@Westwardhousing.org.uk>]
Sent: 03 December 2018 12:52
To: Geoffrey Duggan <Geoffrey.Duggan@swdevon.gov.uk>
Subject: RE: Salcombe Neighbourhood Plan

Dear Sir/Madam

I am not sure why I am receiving this information. I have consulted with the Development team here at Westward Housing, to confirm we do not own any property in Salcombe, and they have no plans at this time to acquire any.

I work with Lettings of rental properties at Westward. I don't believe I'm the best placed person to receive this type of information. If this is not an error and you would like input from Westward, please let me know the type of person you are trying to reach and I will pass on your correspondence.

Yours faithfully,

Nick Pook
Housing Coordinator

0300 100 1010



www.westwardhousing.org.uk

From: Geoffrey Duggan [<mailto:Geoffrey.Duggan@swdevon.gov.uk>]

Sent: 30 November 2018 11:17

To: Nicholas Pook <Nicholas.Pook@Westwardhousing.org.uk>

Subject: Salcombe Neighbourhood Plan

Please reply to: Neighbourhood Planning
Address: South hams District Council
Follaton House, Plymouth Road
Totnes, TQ9 5NE

E-Mail: NeighbourhoodPlan@swdevon.gov.uk

Nicholas.Pook@Westwardhousing.org.uk

29 November 2018

As a consultee to the Salcombe Neighbourhood Plan, I am writing to you; In accordance with regulation 16 of the Neighbourhood Planning regulations to inform you that we have now received the Salcombe Neighbourhood Plan proposal.

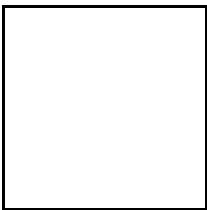
We will formally consult on this document for a period of 6 weeks from 30th November 2018 until 11th January 2019 before making a formal decision as to whether we should instruct an independent examiner to carry out the examination.

You may view a copy of the plan via our website <https://www.southhams.gov.uk/article/3882/Neighbourhood-Development-Plans-and-Orders> or by getting back in touch with us via the details above.

Yours sincerely

S. Packham

Neighbourhood Planning
South Hams District Council and West Devon Borough Council



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Justin Davey

From: BARR Sarah-Jane 56305 <Sarah-Jane.BARR@devonandcornwall.pnn.police.uk>
Sent: 18 December 2018 10:40
To: SW-Neighbourhood Planning
Subject: RE: Salcombe Neighbourhood Plan

Good morning,

Re: Salcombe Neighbourhood Plan draft proposal.

Thank you for requesting consultation on the above. Having reviewed the draft proposal I would like to advise that the police have no further comment to make but would like to take this opportunity to express sincere thanks at the level of reference to designing out crime and crime prevention per se in the plan and also for addressing the importance of ensuring adequate and practical parking provision for new development.

Please do not hesitate to contact me if I can assist further.

Thank you

Kind regards

Sarah-Jane

Sarah-Jane Barr
Police Designing out Crime Officer - South Hams, West Devon, Torbay & Dartmoor National Park
Totnes Police Station
Ashburton Road
Totnes
Devon
TQ95JY

Telephone 01803 218783
Internal 304783

Email SarahJane.BARR@devonandcornwall.pnn.police.uk

Alliance Prevention Department

Devon & Cornwall Police and Dorset Police

Working together to serve the public

From: Geoffrey Duggan [mailto:Geoffrey.Duggan@swdevon.gov.uk]
Sent: 30 November 2018 11:17
To: BARR Sarah-Jane 56305 <Sarah-Jane.BARR@devonandcornwall.pnn.police.uk>
Subject: Salcombe Neighbourhood Plan

Please reply to: Neighbourhood Planning
Address: South hams District Council
Follaton House, Plymouth Road
Totnes, TQ9 5NE

E-Mail: NeighbourhoodPlan@swdevon.gov.uk

29 November 2018

As a consultee to the Salcombe Neighbourhood Plan, I am writing to you; In accordance with regulation 16 of the Neighbourhood Planning regulations to inform you that we have now received the Salcombe Neighbourhood Plan proposal.

We will formally consult on this document for a period of 6 weeks from 30th November 2018 until 11th January 2019 before making a formal decision as to whether we should instruct an independent examiner to carry out the examination.

You may view a copy of the plan via our website <https://www.southhams.gov.uk/article/3882/Neighbourhood-Development-Plans-and-Orders> or by getting back in touch with us via the details above.

Yours sincerely

S. Packham

Neighbourhood Planning
South Hams District Council and West Devon Borough Council



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For more information, or to contact us, please visit us at www.devon-cornwall.police.uk or www.dorset.police.uk or e-mail 101@devonandcornwall.pnn.police.uk or 101@dorset.pnn.police.uk



Justin Davey

From: Susan Watts <susan.watts@devon.gov.uk>
Sent: 21 December 2018 09:49
To: SW-Neighbourhood Planning
Subject: Salcombe Neighbourhood Plan: Devon County Council Archaeology Department Response

Dear Sirs,

Thankyou for advising us of the revised version of the Salcombe Neighbourhood Plan. Our comments are as follows:

Firstly, thank you to the Neighbourhood Plan Steering Group for taking the majority of our previous comments on board. There is a good use of photos. It is important to bring out the character of Salcombe.

However, we do have a few additional comments.

Pages 12 and 76

Theme 2: Should read 'Built and Historic Environment' to be consistent with heading on p9

Page 54 Policy SALC BI b)

Check number of appropriate NPPF paragraph. ?189 rather than 128. A new version of NPPF was issued in July 2018.

Section 5. We are pleased to see the history of Salcombe outlined here but note that there is no actual mention of prehistoric settlement and activity in the wider landscape. As stated in our previous comments, evidence has been found in the wider parish for much earlier activity. A bronze Age axe has been found in the parish (exact location unknown) (HER MDV30136), there is also a possible Bronze Age or later field system (HER MDV36183), a possible cremation urn burial (HER MDV36190) and there are also indicators of a prehistoric ritual landscape (HER MDV36195, 7049)

Appendix B40 Should read 'Designated and non-designated heritage assets...' or just 'Heritage Assets for Salcombe Parish'

Yours faithfully,

Sue Watts

(Historic Environment Officer)

Sue Watts
Historic Environment Team
Planning, Transportation and Environment
Devon County Council
AB3 Lucombe House
County Hall
Topsham Road
Exeter EX2 4QD
Email: Susan.Watts@devon.gov.uk
Tel: 01392 382994

My normal working days are Wednesday to Friday.

Web: <http://www.devon.gov.uk/historicenvironment> | Twitter: [@DevonHistEnv](https://twitter.com/DevonHistEnv)

Disclaimer: <http://www.devon.gov.uk/email>

Personal data we collect from you will be processed in accordance with this Privacy Notice: <https://new.devon.gov.uk/privacy/privacy-notices/privacy-notice-for-historic-environment/>



Justin Davey

From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: 29 January 2019 12:06
To: SW-Neighbourhood Planning; Geoffrey Duggan
Subject: Salcombe Neighbourhood Plan

Dear Mr Duggan

Thank you for your Regulation 16 consultation on the Salcombe Neighbourhood Plan.

I can confirm that there are no comments on the Plan we wish to submit.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West
Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

Historic England | 29 Queen Square | Bristol | BS1 4ND
<https://historicengland.org.uk/southwest>



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From: Geoffrey Duggan [<mailto:Geoffrey.Duggan@swdevon.gov.uk>]
Sent: 19 December 2018 10:40
To: Historic England South West
Subject: Salcombe Neighbourhood Plan

Working together



Service: Neighbourhood Planning
E-Mail: neighbourhoodplan@swdevon.gov.uk

18th December 2018

Historic England (formerly English Heritage)

Dear Consultee,

I wrote to you on 29th November 2018 regarding the regulation 16 consultation on the Salcombe Neighbourhood Plan (the Plan) which was to run between 30th November 2018 and 11th January 2019.

On 6th December 2018, Salcombe Town Council wrote to the Council to formally **WITHDRAW** that version of the Plan and the submitted Basic Conditions Statement.

On 18th December Salcombe Town Council submitted a revised version of the Neighbourhood Plan and the Basic Conditions Statement under regulation 15.

In terms of the Plan the only alteration is the substitution of the originally identified settlement boundary (Figure 1B) with a revised settlement boundary. The revised settlement boundary is that identified in the current Development Plan (South Hams Local Plan 2011). The Basic Conditions Statement has been altered in respect of the SEA/HRA Screening Opinion taking full account of comments made by Natural England since its original submission.

As a consultee to the Salcombe Neighbourhood Plan, I am writing to you, in accordance with regulation 16 of the Neighbourhood Planning regulations, to inform you that we have now opened consultation the revised version of the Salcombe Neighbourhood Plan.

We will formally consult on this document for a period of 6 weeks from 18th December 2018 until 29th January 2019 before making a formal decision as to whether we should instruct an independent examiner to carry out the examination.

You may view a copy of the plan via our website <https://www.southhams.gov.uk/article/3882/Neighbourhood-Development-Plans-andOrders> or by getting back in touch with us via the details above.

Yours sincerely

S.Packham

Neighbourhood Planning
South Hams District Council and West Devon Borough Council

South Hams
Tel: (01803) 861234
Fax: (01803) 866151

West Devon
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Fax: (01822) 813634

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15 January 2019

Dear Salcombe Neighbourhood Plan Team,

Thank you very much for consulting the Woodland Trust on your neighbourhood plan, and we appreciate the opportunity to comment. Neighbourhood planning is an important mechanism for ensuring communities have an active role in protecting, restoring and planting trees and woods.

It is great that you recognise the presence of ancient woodland in your parish. If you need any further clarity, you can access information about mapping ancient woodland and notable trees here: <http://www.magic.gov.uk/MagicMap.asp> and <http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/>.

We strongly welcome Objective 1 of your plan which includes a commitment to protect ancient woodland, trees, woods and hedges. We also strongly welcome section SALC Env1 e) which specifically references the revised NPPF which gives ancient woodland and ancient and veteran trees the highest possible level of protection in planning law, with the wording 'exceptional only' putting it on a par with the historic environment.

We also support the proposal to designate the Woodland Trust owned site known as The Plantation as a Local Green Space (LGS) in paragraph 6.2.11 and Figure 12c.

Neighbourhood planning is a great opportunity to think about how trees can enhance your community and the lives of its residents. We welcome the commitment to deliver green infrastructure and would emphasise the importance of enhancing tree cover and incorporating trees into new developments. Our guidance document on residential developments may be useful in giving you some ideas.

<http://www.woodlandtrust.org.uk/mediafile/100631140/pg-wt-300615-residential-developments.pdf?cb=093f261286fd4fdc8befda998e4b7c11>.

We would like to take this opportunity to draw your attention to the Woodland Trust's neighbourhood planning microsite:

<https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/> which may give you further ideas for your plan.

In addition the evidence, policy and practice section of our website provides lots of more specific evidence on more specific issues such as air quality, pollution and tree disease.

<https://www.woodlandtrust.org.uk/publications/>. Our evidence base is always expanding

through a vigorous research programme of PhDs and partnership working. So please do check back or get in touch if you have a specific query.

You may also be interested in our free community tree packs, schools and community groups can claim up to 420 free trees every planting season:

<http://www.woodlandtrust.org.uk/plant-trees/in-your-community/>

If you require any further information or would like to discuss specific issues please do not hesitate to contact Victoria Bankes Price – Planning Advisor 0343 7705767

victoriabankesprice@woodlandtrust.org.uk

Best wishes and good luck with your plan.

Catherine Brabner-Evans
Regional External Affairs Officer - South West

Telephone: 03437705837 | Mobile: 07500997743
Email: CatherineBrabner-Evans@woodlandtrust.org.uk

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL
0330 333 3300
www.woodlandtrust.org.uk







Neighbourhood Planning
South Hams District Council
Follaton House
Plymouth Road
Totnes
TQ9 5NE

Date: 28th January 2019

Our Ref: J003191/SC/P

Dear Neighbourhood Planning,

REGARDING: SALCOMBE NEIGHBOURHOOD DEVELOPMENT PLAN 2018 TO 2034 – REGULATION 15 SUBMISSION

I refer to the above. We have been instructed by Park Green (South West) Limited Investments to make representations on the Regulation 15 submission of the Salcombe Neighbourhood Development Plan.

Park Green (South West) Limited support the retention of TTV29.21 Land West of West End Garage, Salcombe as a housing site for 20 homes and have made representations to the Joint Local Plan to that effect.

The National Planning Policy Framework (NPPF) states at Paragraph 13 that the application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

Paragraph 29 of the NPPF states

“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”

Under the heading ‘Identifying land for homes’ paragraph 69 of the NPPF states the following:

WS Planning & Architecture, Europe House, Bancroft Road, Reigate, Surrey, RH2 7RP

T: + 44 (0)1737 225 711 F: + 44 (0)1737 226 311 admin@wspace.co.uk wspace.co.uk

Reg Office: Europe House, Bancroft Road, Reigate, Surrey, RH2 7RP Company No. GB3763487 WS Planning & Architecture is a trading name of Woods, Sanders & Co Ltd

Managing Director: Mr B Woods BA TP MRTPI Planning Director: Mr S Copping BA (Hons) DipTP MRTPI Architectural Director: Mr L Barker BA(Hons) BArch (Hons) RIBA

“Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.”

It is considered that the overall approach taken by the Town Council in supporting the allocation of homes as set out in the JLP including our clients site at land West of West End Garage. Furthermore, a pre-application meeting has been held with the Council as such we can confirm that the site is suitable, sustainable, viable and deliverable.

The site has been promoted for a number of years and we are currently in the process of preparing a planning application for the development of the site. It is noted that Salcombe will see a reduction in the number of allocated homes following the revision to TTV29.20 Shadycombe which has been reduced from 30 to 20 homes making the remaining sites even more important to deliver. The land at TTV29.21 could accommodate some additional homes to make up for the shortfall identified above.

The current density of the site at TTV29.21 is 20 homes at 22 dwellings per hectare. Increasing the number of homes on the site would increase the density to a maximum of 33 dwellings per hectare (if 30 were built) which is lower than the 37 dwellings per hectare on land at Salcombe View Phase 1 to the north of the site and Bonfire Hill which is 45 dwellings per hectare to the east of the site.

We believe consideration should be given to allocating additional housing on land at West of West End Garage to ensure sufficient homes can be built to serve the wider community.

Housing Policies in the Neighbourhood Plan

Policy SALC H1 Affordable Housing

We support the approach set out in Policy SALC H1 and accept that affordable homes should be promoted as a priority.

Policy SALC H2 Market Housing

We support the approach set out in Policy SALC H2 and support the allocation of sites as set out in the Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP).

Policy SALC H3 Principal Residence

We do not support the approach set out in Policy SALC H3 given the restrictions this policy imposes on developers bringing homes to the market. Only 65% of the respondents to the previous Survey relating to Second Homes supported the policy. It is also noted in the Consultation Statement that while there was support for the policy respondents also objected to the policy considering it would have an adverse affect on the local economy and property market. Others who supported the policy were concerned how it could be enforced.

By singling out new homes for special treatment they simply move the demand to second hand stock in the town and help drive up their prices. It is highly unlikely to make any difference to the number of Second Residences in Salcombe but will serve only as a disincentive to develop new homes in the Salcombe.

The number of second homes for the area identified in the JLP is 34.45% and in the NPG as 57.3%. A blanket ban on homes as a secondary residence simply cannot be justified on either basis. We would possibly support a percentage based figure akin to the Affordable Housing threshold allowing a mix of both primary and secondary homes. Given the uncertainty in the housing market and current political climate it is necessary to provide more flexibility.

According to Policy SALC H1 Affordable Housing there are strict controls on the properties being made available for local residents and would not be available as a second home. Hence 30% of the allocated site will already be restricted.

People who buy a second residence often do so to enable them to retire and take up permanent occupancy. This enables them to be part of the community at an earlier stage which is good for the community and local economy.

There needs to be a mechanism in place that if the new properties, especially on the allocated sites, are not purchased within a certain time frame as a Principal Residence then they could become available as a Secondary Residence.

Policy SALC H4 Exception Sites outside the settlement boundary

We support the general approach set out in Policy SALC H4 and support the use of Exception Sites as set out in the Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP). However, Part e) refers to Policy SALC H3 which would mean that the 15% market homes allowed on exception sites to ensure viability would have to be a Principal Residence. For the reasons set out above we do not support Part e of Policy SALC H4.

In summary we are supportive of the affordable housing policy, allocation of land for housing and provision of exception sites. However, we do not support the Principal Residence policy.

If you have any queries regarding the above please contact me at the office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Spencer Copping', with a stylized, flowing script.

Spencer Copping

Planning Director.