

Representation on the Rural Areas Site Allocations DPD
South Hams District Council
April 2010

by the South Hams Society
15 June 2010

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The Representation

This document is a representation made by the South Hams Society to the Planning Inspectorate on the Rural Areas Site Allocations DPD submitted for adoption by the South Hams District Council (SHDC). A separate representation has been made by Mr P Sandover for the Kingsbridge DPD.

It is made on behalf of The South Hams Society (SHS), a local society founded in 1961 of approximately 500 members whose objectives are:

- to stimulate interest and care for the beauty, history and character of the South Hams,
- to encourage high standards of planning and architecture that respect the local character,
- to secure the protection and improvement of the landscape, features of historic interest and public amenity,
- to promote the conservation of the South Hams as a living, working environment.

The Society has followed the progress of the DPDs from 2008 and has expressed its concern on many occasions. It has written in its Bulletin about the process and to the Prince's Foundation for the Built Environment about the problems with the workshops and their report. Appendix 1 contains a letter it has written to Mr. Incol, CEO of South Hams District Council, on its concern about the planning process.

We have had reactions to the DPDs from Society members, residents and councillors in Kingsbridge and 10 of the rural parishes in the South Hams listed in Appendix 2. All except 1 have made complaints about the process of planning and the lack of effective consultation. We have also communicated with Local Societies in other areas of the South Hams who have similar misgivings and will be making their own representations.

The Society considers that the planning process adopted by SHDC is sufficiently flawed in its assumptions and many of its stages to make all the DPDs unsound. But for the reasons above this representation is made on the Rural Areas Site Allocations DPD.

Introduction

Many of the reasons why the Society believes the DPDs are unsound appear to stem from three major factors:

the ambition of SHDC to be among the first to complete the LDF process,
the timescale set by the Council for completion of the process,
changes in the national economy and government in the last two years.

The Society considers that SHDC's ambition to be among the first planning authorities implementing the LDF, a new and complex planning process, was unwise in a small rural district council with few planning resources. Especially so in an District in which an AONB covers 30% of its area and which has around 90 rural settlements whose planning requirements are radically different from the four towns in the area.

The timescale appears to have been set by the District Council so that the DPDs could be completed before any implementation of the Boundary Committee's proposals for a unitary Devon. In practice this turned out to be a baseless fear but the short time available has led to an over-simplification of the planning process in which there has been a lack of communication and consultation with the community and their existing town and village plans. Details of sites have not been considered, errors have been made in assessing them and options for delivery of affordable housing have not been explored.

The difficulties caused by short timescale and the complexity of the new process are illustrated by the collapse of the 2007 Approved Local Development Scheme. The Site Allocations DPDs were originally scheduled to be completed in stages for each part of the district with a preferred options consultation as well as a submission consultation. All the DPDs have now been issued together between 3 years and 6 months late and with no Preferred Options consultation. An undocumented process led from the delivery of the Prince's Foundation report in December 2009 to the unannounced and unadvertised proposals put on the SHDC website later in the same month for Council approval at a meeting on the 17th December without further consultation.

The Preferred Options stage of consultation although appearing in the Approved Local Development Scheme seems to have been omitted to ease the pressures on the timescale. Only those towns and parishes who were alert enough to interrupt the planning process and challenge SHDC during December 2009 and January 2010 were able to modify the proposals. They obliged SHDC to set up an "Additional Consultation" period for Kingsbridge and 10 rural settlements ending on 10th February 2010.

This has led to much resentment in those settlements who did not take this opportunity. They believe that the planners have imposed a solution on them without consultation and as a result "Action Groups have sprung up in a number of settlements. Even those who took part in the Additional Consultation found that the planners strongly resisted changes despite the backing of the majority of the community.

The advent of the recession has meant that the economic growth forecasts made in the Regional Spatial Strategy of 2006 on which the Site Allocations have been based are now very unlikely. The new central Government has abolished the RSS and housing requirements are to be determined by SHDC.

The Society and most residents of the District agree with SHDC that the District is in great need of affordable housing. But it appears that the only method of delivering them considered by SHDC is contained in Policy CS6 in the Core Strategy LDF which sets an overall target of 50% affordable housing from all sources. Effectively this attempts to enforce the policy that planning approval for commercial housing developments will only be gained if equal numbers of open market and affordable houses are provided. Consequently the Site Allocations DPDs are heavily oriented towards providing large green-field sites attractive to commercial house builders.

Recent planning applications and appeals have shown that 25-30% is the maximum developers will consider in the present market. If the necessary affordable housing is to be built then other options for providing them must be found and the large perimeter green-field sites shown in the Site Allocations DPD are not necessary.

This policy will also result in large numbers of open market houses being built that are too expensive for local communities and can only be afforded by those retiring or buying second homes thus exacerbating the problems the District has in coping with the issues raised by these households.

For the above reasons the SHS considers that all the Site Allocations DPDs should not be approved and the District Council informed that it and the housing figures in the Core Strategy LDF on which it is based should also be revised.

Foundations of the DPD

The Site Allocations DPD is based on the numbers of housing stated in the LDF Core Strategy, December 2006. This document was drawn up using the the assumptions embodied in the Regional Spatial Strategy, 2006-2026, (RSS) for which a draft was published in 2006. The draft has been subject to a number of reviews during which the South Hams was identified as a new growth point for economic activity and therefore housing figures were steadily raised. The regional planning process was then overtaken by the onset of the recession following the banking crisis and the RSS was due to be revised yet again.

Over the 20 year period the 2006 RSS made predictions for growth of economic activity between 2.8 and 3.4% and for population growth of 750,000. These now look very unlikely to be realised and economic growth of considerably less than half seems much more realistic. The identification of the South Hams as a new growth point seems particularly unlikely at a time when existing centres of economic activity are struggling.

The Secretary of State for Communities and Local Government's letter to all planning authorities confirms the Government's commitment to abolish all Regional Strategies. The RSS will now never be published and its assumptions on growth and housing requirements are no longer binding for the District Council which can make its own assessment of housing need.

Although the demand for housing resulting from the decrease in household size occasioned by family breakups and increasing lifespan may continue during this period of slow or zero growth it seems likely that this demand will be suppressed by financial shortages. However desirable housing the homeless may be, it also seems possible that it will be governed by the same financial imperatives.

In much of the south-west the demand for second homes has kept house prices high. The South Hams has 5,000 second homes. But the same financial pressures coupled with the expectation that capital gains tax will be increased is already bringing numbers of second homes on the market. The consequent drop in house prices will bring more housing within the scope of some local people to purchase.

All these factors undermine the housing and employment land requirements in the LDF Core Strategy to such an extent that we consider that a complete reassessment is necessary to produce a new set of requirements. We suggest that this done using the existing Housing Needs Surveys for towns and parishes and commissioning more as required. The surveys indicate that the primary need is for "social rented housing". Mixed equity housing is not affordable for many in the lowest income bracket.

The Site Allocations DPD is based on the Core Strategy figures and will therefore need revising to the new requirements. Within the existing DPD there is no indication of the relative desirability of each site beyond the general guidance that brown-field sites should be developed first. The new documents should explore all methods of delivering affordable housing on brown-field sites and accommodate an uncertain future and avoid the consequences of "planning blight" on green field sites.

Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA was conducted with the West Devon DC and published in March 2009. It identified about 350 sites in the District. In the towns known as area centres the SHLAA covered small and large sites but in the local centres and villages it did not go down to an adequate level of detail. The SHLAA also missed sites which could be developed using more lateral thinking.

The inadequate level of detail in villages meant that a large proportion of greenfield sites were identified while small infill sites which could be developed for a few houses were often missed. This was particularly unfortunate as they would have been an appropriate and traditional scale of development for them.

This defect was exacerbated by a later decision to omit all villages without a secondary school and shop from the Site Options. Thus of the approximately 90 settlements in the District of which 50-60 have development boundaries only 18 qualified for the Site Allocations. These 18 therefore received a disproportionately large additions while many of the villages missed out would have welcomed a small addition of housing, particularly of affordable houses. In total these villages could have made a considerable contribution to the affordable housing needed.

One such case was West Alvington who suggested to SHDC that they could with advantage accommodate 10-12 affordable houses on a small site they knew was available. They asked the planners if they could be included in the site allocation. And indeed they were - with 50 houses on a different site. Residents outrage was sufficient to make SHDC withdraw and no housing site is allocated to the village.

A further problem with the level of detail was that the SHLAA did not distinguish between parts of a large site with different development potential. For example, in Salcombe a large site was identified containing a playing field which was correctly deemed not available for

development. But around the playing field was a significant area of scrub land in which which suitable sites for small groups of houses could have been found.

An example of a site which could have been developed with more lateral thinking is the short stay car park in Salcombe which did not appear in the original SHLAA but was added later after pressure from the town residents. The topography of this site made it very suitable for development by excavating a level car park and building housing on a deck above. The site was owned by the District Council and so it could have been the subject of a joint venture with a developer. The site was in the town centre and advantageously situated for access to shops, employment and public transport. Yet it was rejected because of its "current use". Curiously this might be the intention for the Quayside site in Kingsbridge as it would not otherwise be possible to maintain the stated objective of accommodating 100 houses while maintaining the number of car parking spaces.

In general the SHLAA, like much else in the planning process which produced the Site Allocations DPD, served the four towns in the district better than the much greater number of local centres and villages. Appendix 3 contains a list of the villages in the DPD with the numbers of houses proposed and the resulting increase in population. It shows what a wide range of increases there are - from 35% to 3%. There are no indications that this was planned when the Core Strategy allocated 400 houses to the villages. It seems more likely that they are simply the result of the land being made available by its owners in the SHLAA. And if this is the case can this be a sound method of drawing up major planning decisions for the District?

Site Options

The sites identified by the SHLAA which were then reduced in number by SHDC planners by an undocumented process to produce a "Site Options" document published in May 2009. No rationale was provided by the choice and in some cases the site contained areas of land which their owners had not made available for development.

This document finally contained 320 sites but a number were added in the "Additional Consultation" in January 2010 after pressure from Councillors and residents. Twelve towns and villages were included in the Additional Consultation, Kingsbridge, - nearly half of the total settlements in the Site Allocations DPD. These sites were not considered in the initial STA or in the Design Review Assessment - a considerable flaw in the planning process.

Illustrating these issues the owners of part of site 3 in the Site Options for Salcombe received a letter dated 1st October from SHDC asking if the site were available for development - after it had been included in the Site Options, appeared in the STA analysis and selected in the The Design Review Assessment. The owners replied that it was not available but the site was still included in the Allocations for 2016 - 2026. The Leader of the District Council told the owners "that it was not necessary for sites scheduled for development after 2016 to be available" although previously it had been maintained that the SHLAA is based on availability.

The same series of events occurred in Aveton Gifford when it became apparent that the owners of site 3 in Site Options would not make it available.

The Site Options Process was not conducted with enough care and attention to detail to be a good foundation to a sound DPD.

Sustainability Threshold Assessment (STA)

The STA analysis was carried out for SHDC by a specialist firm Enfusion. It was published together with the Site Options in May 2009. As the SHLAA was published in March 2009 this left at the most 3-4 months for the process to be carried out on 320 sites.

The STA charts which were intended to help assess the suitability of each individual site in the Site Options contain many errors and misjudgments. They seem to arise partly from the parameters set by the planners and partly from inadequate knowledge of the sites themselves.

An important example is to be found in the Habitat Regulations Assessment. Paragraph 5.3 states that only impacts on Natura 2000 sites will be taken into account in the STA. Thus all other designations are ignored including SSSIs, the AONB, National Parks, Local Nature Reserves, County Wildlife Sites, even the protection afforded by the planners adopted LDF Core Strategy. Inexplicably this is called a “highly precautionary approach” but seems contrary to the requirements of PPS 9: Biodiversity and Geological Conservation which states that local designations should be recognised.

This is reflected in the STA tables where, for example, Site 3 in Salcombe, a County Wildlife Site, is given the same level of assessment under biodiversity as Site 10, a car park in the centre of town. Other judgements appear equally difficult to understand - the above car park is judged as having sustainability problems with walking, cycling and private car access while the County Wildlife Site which can only be accessed by single track roads or footpath is given the same assessment.

The assessments made in the Sustainability Summary are similarly flawed. For example, the same car park is given the same summary grading as Site 11, a greenfield site with 2 constraints marked higher.

There are numerous other examples of hurried and defective judgement in the STA analysis of the sites in the District. Further examples occur in the STA of sites in Wembury, Modbury and many other villages. Perhaps this is not difficult to understand when approximately 320 sites in 28 towns and villages have to be assessed in a period of 3 months. However it does not make the result more satisfactory and contributes to an unsound planning process carried out in a hurry.

Design Review Assessment (DRA) and the Prince's Foundation Workshops and Report

The Prince's Foundation for the Built Environment (PFBE) were commissioned by SHDC to examine the 320 sites in Site Options and recommend those that should be developed to provide the required number of houses and area of employment land. The process used was to conduct workshops during the period 9 -18 June 2009. The workshops used the PFBE's Enquiry by Design (EbD) method in which planners discussed with invited representatives of settlements the merits of the site options.

The workshops were intended to be a major part of the public participation required. But the representatives attending the workshops proved to be limited to councillors and a very few others. Despite the requirement to identify employment land few employers were invited. Some villages, for example, Stoke Gabriel, were not represented at all.

The EbD process was conducted by two planners for each workshop from the PFBE using large scale maps which had no contours - a significant omission when examining sites in the undulating topography of the South Hams. Consequently sites on steep slopes were chosen such as that in Salcombe and Wembury.

It was very hard to believe that the PFBE planners had looked at the sites sufficiently to understand them. Little or no reference to the SID and STA tables was made in the workshops - perhaps fortunate in view of the errors in them.

The PFBE planners also seemed to pay little attention to the problems of vehicular traffic in the Devon countryside. Sites for large numbers of houses were proposed in their report where access could only be gained along single track and narrow lanes, up steep hills and around sharp corners. Modbury, Wembury and Salcombe are examples of this.

Many of the settlements had existing town and village plans. There was no opportunity to use these and the PFBE planners took no interest in them despite their being in many cases a valuable starting point - Newton and Noss is good example. Communications from Parish Councils and residents to the planners about their housing needs and providing information on suitable sites were not passed to the workshops and in many cases were not answered or even acknowledged.

The planners paid little attention to the community representatives being more concerned with their planning objectives such as "place making" and the smoothing of settlement boundaries. For example, Malborough is fortunate in not having a main road passing through the village. The PFBE planners however sought to change this in the interests of "place making" by proposing a highly visible and exposed site on the other side of the main road despite vehement protests from residents, Fortunately Malborough was able to propose a rural exception site and so opt out of the Site Allocations DPD.

The report of the PFBE arrived 3 months late in December 2009. It illustrated the problems described above. It nominated sites which landowners had stated to be not available. It provided examples of housing layout on sites which were completely unfeasible - housing which could not be built or approached by car.

It transpired later that this was the first time that PFBE had conducted such an exercise and that within the budget of £130,000 for their contract they could not have any more than the most superficial knowledge of the 320 sites they were supposed to consider. Again it seemed that the rural settlements have suffered most from this process while the four towns had most of the attention.

The PFBE Workshops were intended to provide an opportunity for the community to contribute to the Site Allocations DPD. Unfortunately they did not achieve this objective partly due to the limitations on the representative attending, partly because existing town and village plans had not been fed into it and partly because the PFBE planners over-rode the views of representatives despite their much greater knowledge of the sites.

The PFBE report reflected all these faults. It inherited the faults of the Core Strategy, the SHLAA and the Site Options. Because it was the most considerable input to the Design Review Assessment which selected the sites for the DPDs, it did nothing but exacerbate the unsound stages before. The late delivery of the report contributed to the omission of the Preferred Options stage.

Strategic Infrastructure Delivery (SID)

The description of Strategic Infrastructure Delivery in the DPDs confines itself to public spaces, play areas, schools and medical facilities. Any estimates or details of essential services such as roads, sewage, water, surface drainage and energy supply are missing with the exception of a single note that water supply and sewage treatment improvements may be necessary in rural areas.

In many rural areas large estates of housing are proposed which must require significant works on these essential services and influence the selection of sites. Yet as we have seen there was no input from the SID to the Design Review Assessment. In Kingsbridge the DPD proposes a total of 500 houses after 2016. Yet there is no mention of water supplies, sewers or sewage treatment in the DPD.

There are significant problems for vehicular traffic in many of the sites proposed which will require "improvements" to access roads. For example, the sites proposed in Wembury and Modbury. This has been ignored in the Infrastructure delivery.

Similarly many of the sites proposed are steeply sloping and the increased surface water drainage will affect the flood risk of sites downstream. The site proposed in Aveton Gifford is one such case.

The Strategic Infrastructure Delivery is incomplete and was not used to select sites. It thus contributes to other factors in making the Site Allocations DPDs unsound.

Community Communication and Consultation

Publication of the planning proposals and the documents containing the evidence base for the Site Allocations DPDs has taken place largely on the SHDC web site. Relatively little use has been made of the press, radio and other forms of communication more familiar to the general public.

A certain skill in using computers is necessary to get to the documents on the web site. In order to read them the user has to print them - a costly affair for long documents - or use the screen which is a foreign media to many. There is a large section of the public who either do not have a computer or do not have sufficient skill in using them to make access to the documents easy.

The documents themselves present difficulties to the general reader as they have many acronyms and much semi-technical language. There has been little attempt to summarise them to make their implications for the public clearer.

For these reasons communication of the planning proposals to the public has not been satisfactory.

A list of documents and the announcements of their availability outside the website is below. Only those concerning the production of the DPDs from the Call for Sites are shown.

Commencement letter for Site Allocations DPDs	Jan 2008
Call for Sites SHLAA	July 2008, press release
Site Options STA and Design Review	May 2009, press release, letter to Town and Parish Councils
Results of Design Review Assessment	No announcement except to Parish and Town Council Cluster meetings October 2010
Strategic Infrastructure Delivery	No announcement
Habitat Regulation Assessment	No announcement
PFBE final report	No announcement
Draft Site Allocations DPD	No announcement
Additional Consultation	January 2010, press advertisement
The 5 Site Allocation DPDs	No announcement, article in the local paper on 21st May 2010.

What is apparent from this list is that parts of the evidence base and the later stages of the planning process received very little publicity to inform the wider public and enable them to comment. Yet it is these later stages where consultation is most important as they contain the specific information about sites that mean most to the public.

The Additional Consultation on the proposals for 11 settlements was only granted after a few residents in each settlement took action to raise the level of public awareness to the draft Site Allocations proposals. Having been made aware the residents in many cases reacted with vehemence. Because of the lack of publicity they believed that SHDC had “pulled a fast one”. It was quite clear to a dispassionate observer that the general public had no previous knowledge of the planners proposals and they reacted with anger and disbelief.

But the planners found difficulty in accepting this. After one such meeting in Salcombe attended by over 100 residents a planner observed that “there was no consensus”. It was true that it was premature to gain a consensus on the best solution but there was a unanimous view that SHDC had not kept residents informed and the proposals were not what they wanted but what was imposed. Both the Summaries of Responses to the Site Options Consultation and the Additional Consultation are skewed to minimise the importance of the objections by suggesting that they largely arose from a “NIMBY” reaction. In fact many residents had much wider feelings of concern for their small settlements.

For example after the meeting in Salcombe referred to above a town meeting was organised by the Town Council with an exhibition of the SHDC proposals and alternative proposals presented by residents. Two independent questionnaires were provided for attendees and produced similar results. A large majority disagreed with the planners proposals and a lesser but still significant majority agreed on two alternative sites. Many provided detailed reasons for their views on the questionnaire. Yet the planners apparently counted the 300 questionnaires as one objection, refused to change their proposals and wrote a report to the Council which organised the issues to suit their conclusion. It took a site visit and a full District Council meeting on 25th March after the Additional Consultation closed to determine that the resident’s views should prevail.

This experience illustrates much of what has gone wrong with SHDC's production of the Site Allocations DPD. The SHDC planners did not intend to impose a solution on the district. But as the deadlines for completion shown in the Approved Local Development Scheme grew nearer, the report from the Prince's Foundation was late, the planning process grew more hasty and a vital consultation, the Preferred Options Stage of the Site Allocations DPD was missed out. But the SHDC planners were more determined than ever to stick to their proposals lest the whole DPD unravelled.

The lack of the Preferred Options stage of consultation has invalidated the Site Allocation DPD and made it unsound. That just 11 settlements challenged the planners to an additional consultation does not mean that the other 15 are satisfied. It means that public consultation was inadequate and thus conflicts with the requirements of PPS 12 Participation, paragraphs. 4.19 and 4.20. It is clear that the consultation has not been continuous and effective over the District. Far from having a sense of ownership of the Site Allocations DPDs many residents of the District actually oppose it.

Future Action

To prevent similar issues arising again the Society considers that it is particularly important that a new forward planning documents should be written with established short term needs for affordable housing in mind. Open market housing should not enter into these needs. If developers wish to make a housing proposal with a mixture of affordable and open market houses then it can be considered alongside the affordable housing programme.

In the Society's view the District Council should first gather together the affordable housing needs surveys already completed for the District's towns and villages, commission any more required and put them together into a new district affordable housing requirement which can be written into a modified LDF Core Strategy.

Any longer term proposals should have the flexibility to cope with a high level of uncertainty in the economy and changes in society. The Council must set a realistic timescale and provide adequate resources to carry out the task.

In the meantime the requirement for affordable housing must be met. SHDC planners should approach the communities and where possible agree small sites - preferably brown-field ones - for the immediate needs. They should then explore options for providing affordable housing with local land owners, developers and builders, the Homes and Communities Agency, and housing associations.

Appendices

1. Letter written by the South Hams Society to Mr Incoll, CEO of South Hams District Council.



David Incoll
Chief Executive, South Hams & West Devon District Councils
South Hams District Council
Follaton House
Totnes TQ9 5NE

9th February 2010

Dear Mr Incoll

I am writing to alert you to the deep feeling of discontent in many towns and parishes of the South Hams about the Forward Plans for housing being proposed by Community Regeneration. During the last week I attended four town and village meetings about the plans and in each case there was a hostile reception of the proposals. I know that Robin Hogg of the CPRE has also written to the same effect about other towns and villages.

The root of the problem seems to be that the timescales fixed by the Council have not permitted communities to be adequately involved in drawing up the proposals. Local community involvement is required by Planning Policy Statement (PPS) 12. Even the completed proposals have not been explained to the communities in easily understood language, for example, in the local press. Although the planning process has been available on the SHDC website this is not sufficient to communicate them effectively to the community at large.

Many residents in the South Hams do not have computers or are not sufficiently familiar with them to navigate through the 3 or 4 levels of menus necessary to follow the process. And if they finally get to see the process, it is so fenced around with acronyms and jargon which are not easily understood. Only local action has made the communities aware of the proposals and the date for comments prior to publication is now so near many residents feel that the planners have "pulled a fast one" and are angry that the vast developments planned should be forced on them.

The planners seem to have devoted more time to the larger towns in the District where they use some brown-field sites. But there is a strong feeling that in the smaller settlements, the local centres and villages, the planners have used a single modus operandi to achieve the targets for housing they believe they have to implement - that of

siting large housing estates on green-field sites at the perimeter of towns and village. Even in the larger towns large perimeter housing estates are proposed. Presumably they hope that by doing this they will be able to interest large developers and negotiate with them to provide the numbers of affordable houses the Council believes necessary.

Recent experience has shown that in the current financial climate only about 25% of the total number of houses will be affordable. So the proposals create large numbers of additional houses which are not needed and many will be second homes. These housing estates will erode our beautiful countryside and are against Government policy of using brown-field sites first. The results would scar and impoverish our District for ever.

The Council advertises it's priority as providing affordable houses. Most residents, the South Hams Society and the CPRE agree that more affordable houses and employment opportunities are necessary. But there are many other ways which the planners could have met this objective. The use of small sites built by local builders can make over a period of time substantial contributions to the target as well as to the local economy. Small sites have lower overheads because the infrastructure already exists, the allocation of the houses can be dealt with more regard for local circumstances and they integrate into the community easily.

Robin Hogg has mentioned that no use has been made of Village Plans to generate Rural Exception Sites (RES) and suggested the idea of Village Exception Sites. We know of cases, for example West Alvington, where land has been available at no cost, residents have agreed a small development of 12 affordable houses and informed the planners only to find their suggestions ignored and a proposal for 50 houses on a green-field site on the village boundary. Yet it can be done, for in Malborough an RES for 17 affordable houses has been set up and is applying for planning approval while no proposal for other development has been made.

Again in Salcombe the Council own a car park near the town centre which is eminently suitable for development to provide car parking under a deck and housing above. It would make a contribution of at least 20 affordable house as well as down-sized houses for the elderly which would free up more housing in the town. But this option is being ignored in favour of a green-field site bordering the harbour which is a county wildlife site, the habitat of 2 protected species, slopes at 1 in 3 and has only single track road access.

In Modbury the town council wrote last year to the planners asking that housing should be built on infill sites which they proposed in the town. The planners ignored this letter (not even acknowledging it) and proposed another green-field site for 80 houses on the town periphery.

In a similar way The South Hams Society wrote to the Prince's Foundation and the planners in October last year expressing our concerns over the draft proposals. We got no reply or even acknowledgement.

We can only conclude that in the attempt to make plans for the whole district in an unnecessarily short timescale set by the Council, your planners could not cope with the level of detail required for a smaller scale, incremental approach. Even worse they employed a consultancy, the Prince's Foundation, who had no knowledge of local conditions and an even shorter time in which to make recommendations.

The planners did not even have time to complete the requirements of relevant PPS - for example, there has been little or no work on Strategic Infra-structure Delivery and biodiversity requirements have been missed. In fact there have been so many omissions, defects and inconsistencies in the planning process as to make it very vulnerable to legal challenge and likely to be rejected at the inspection stage.

If the planners had a longer time scale and had come to the community earlier and discussed the targets and how they were to be met they would have received much help and local information of great value to them. For it is a mistake to think that communities cannot contribute and are not sympathetic to planning. They have great resources of expertise as well as knowledge. These sentiments were expressed by Matthew Taylor MP, author of a report on rural housing commissioned by the Prime Minister. But he also warned that if plans are imposed on a community then they will find a barrister to oppose them. And in the South Hams residents are already talking of this as the head of forward planning will confirm.

It is clear that the planning process has gone badly wrong. The attempt to plan for the whole district in too short a timescale and with too few resources and too little community involvement has produced proposals which are not only clumsy and insensitive but will do lasting damage to the District Council, its communities and the countryside. There is still time for the Council to remedy this by changing its timescale, opening its planning process to the community and harnessing the contribution it can make. It can only enhance the reputation of local government.

Yours sincerely

John Chalmers

cc.

G Streeter MP

A Steen MP

Councillors R J Tucker, P Coulson, D O'Callaghan, R Gilbert, M Howarth, J Brazil

Lee Bray, Head of Community Regeneration, SHDC

R Hogg, Chairman, Devon CPRE

2. List of villages from whom views have been taken.

Wembury

Marldon

Stoke Gabriel

Aveton Gifford

West Alvington

Salcombe

Malborough

Avonwick

Stokenham & Chillington

Yealmpton

3. List of increases in population of villages in the Rural Areas Site Allocations DPD.
Source: Stoke Gabriel Action Group

This table shows the likely increases in population if all the housing planned in the Site Allocations DPD up to and after 2016 were built. The figures are taken from the last census and assume 3 persons per house.

Village	Planned houses	Population	%increase
Stoke Gabriel	140	1205	35
Blackawton	60	647	27
West Alvington	50	561	26
Avonwick	30	360	25
Stokenham	150	2000	22.5
Modbury	100	1500	20
Loddiswell	60	903	19.9
Stoke Fleming	60	980	18
Yealmpton	100	2000	15
Dartington	95	1917	14.8
Salcombe	93	1893	14.7
Thurlestone	40	821	14.6
Harbertonford	60	1285	14
Ermington	35	850	12.3
Brixton	50	1207	12
Aveton Gifford	30	772	11.6
Ugborough	35	1736	6
Diptford	10	500	6
Marldon	35	2300	4
Kingswear	15	1322	3.4
Holbeton	15	1402	3.2
Wembury	30	2900	3