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## **PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN REGULATION 19 CONSULTATION**

### **Joint representations from Rattery Parish Council and Rattery Parish Plan Steering Group (Corrected March 2018)**

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### **Summary of Key Points**

- The evidence base used in respect to Rattery is unsound and leads to a disproportionately high, unjustified and unsustainable indicative level of housing being allocated to the village.
- Contrary to assertions in the JLP, SHLAA data is not taken into account in calculating the indicative level of housing for Sustainable Villages.
- The JLP's treatment of housing completions and commitments in the first two years of the plan period is both inconsistent and confusing and therefore compromises the validity of this consultation.
- The strategy of allocating indicative levels of housing to the Sustainable Villages is flawed in both concept and application and will fail to deliver the housing targets set by the JLP.

**1. The figures for housing supply in Sustainable Villages are, in at least one case, unsound. Inaccuracies in their calculation should be removed and the presentation of the figures in the JLP corrected.**

- a. The calculation of the potential supply from Rattery in the Housing Topic Paper (Provision and Supply) March 2017 is inaccurate. The correct figure is 3 not 15. (For details see Appendix A, p.6.) This means that the total forecast supply is 731 not 743. Although this error does not necessarily affect the rounded down figure of 720, used in JLP Figure 3.3, as an estimate of the number of new homes which might be built in the period 2017 -2034 in Sustainable Villages, it needs to be updated to ensure future capacity assessment is sound.
- b. The total housing supply forecast for Sustainable Villages is 1214 rather than the 720 listed for Sustainable Villages in JLP Figure 5.1 “New Homes 2014-2034”.
  - i. JLP Figure 3.3 shows a total of completions and commitments for the Thriving Towns and Villages Area of 4,802. Of this, 494 are in Sustainable Villages (see Thriving Towns and Villages Housing Trajectory).
  - ii. This figure of 494 added to the estimate of potential supply of 720 gives a total expected housing supply of new homes in Sustainable Villages for the plan period (excluding windfalls) of 1214.
  - iii. JLP Figure 5.1 is therefore either inaccurately titled or inaccurate in failing to include completions and commitments.

**2. The Indicative levels of housing for each Sustainable Village (JLP Figure 5.8) are not fit for purpose and do not provide a sound means either of providing guidance to neighbourhood planning or of monitoring the delivery of housing by the JLP. They should be replaced with a more robust system.**

- a. The system of indicative levels as presently set out in the JLP will fail to deliver the required minimum number of houses in the Sustainable Villages.
  - i. The indicative levels total 1040. This falls far short of the 1214 homes required to meet the predictions in the housing supply forecast (see 1.b above).
  - ii. The indicative levels of “about 10”, “about 20” or “about 30” are not a reliable means of monitoring delivery of the JLP in Sustainable Villages.
  - iii. The indicative levels are too vague to provide a useful guide to neighbourhood planning.
- b. The JLP does not identify or explain the anomaly between the supply forecast of 1214 and the total of indicative levels of 1040. The anomaly has, however, been explained to us by SHDC planning staff as a decision on the part of the JLP not to include completions and commitments in the indicative levels for Sustainable Villages.
  - i. This strategy is not described, justified or explained anywhere in the JLP.
  - ii. This strategy is contrary to the title of JLP Figure 5.1 which labels the figure of 720 as “New Homes 2014-34”, which leads to the logical assumption that completions and commitments are included in indicative levels.
  - iii. Consultation with the Parish Council of the neighbouring parish of Staverton reveals that it has been told by SHDC that indicative levels do include completions and commitments. This is consistent with JLP Figure 5.1 but is the exact opposite of the advice we have been given.

- iv. This level of contradiction and confusion about a key part of the delivery of the JLP in the Sustainable Villages means that those communities cannot properly comment on this aspect of the JLP. The validity of this Regulation 19 consultation is therefore seriously compromised.
- c. Were it to be the case that completions and commitments have not been taken into account in setting indicative levels, this would be an inappropriate strategy for which better alternatives exist.
  - i. The indicative levels would be grossly disproportionate for the small proportion of Sustainable Villages with completions and commitments (16 out of 70). In several cases the resulting level of new housing within the plan period would more than double. (For details see Appendix B, p.7.)
  - ii. The indicative levels would be unsound, out of date and inaccurate guides for neighbourhood plans in those villages with completions and commitments. This would be in contrast to the expectation in other plan areas, such as Key Villages, that neighbourhood plans are expected to take completions and commitments into account.
- d. JLP paragraphs 5.13 and 5.156 state that the availability of sites in the SHLAA has been used in the calculation of the indicative levels but there is no evidence of this being the case. It would seem that the assertion that SHLAA data has been used is not justified.
  - i. There is no correlation between the indicative levels and the availability of sites in SHLAA data (Housing Topic Paper Provision and Supply March 2017). (For details see Appendix C, p.9.)
  - ii. Rattery is given an indicative level of 20 new houses despite the fact that the latest SHLAA report for Rattery indicates the potential yield as only 3 units (see 1.a above) and concludes:
 

*Rattery is a small village located in the east of the district. It has a very limited provision of local services. Due to the lack of facilities in this location, any development will lead to an increase in use of the private car and is therefore considered to be an unsuitable area for development.*
- e. The indicative levels are taken straight from the South Hams and West Devon Sustainability Framework where they are listed as “recommended minimum requirement” but with no explanation as to how they have been arrived at.
  - i. No justification is given for using the figures 10, 20 and 30 and this seems to be a simple and ill-considered use of round numbers.
  - ii. This is not an adequate sustainability assessment as required of a Local Plan.
  - iii. This is an inappropriate strategy when better alternatives are available but apparently not considered.
- f. The grouping of the Sustainable Villages into three bands is illogical and bears no relation to the distribution of the data. By having more bands, or calculating individual indicative levels for each village, the JLP would be better able to take into account differences in sustainability. (See Appendix D, p.10.)
- g. Crude scoring of this nature means that small differences in the sustainability score lead to a significant and disproportionate increase in the indicative level. A difference in 0.5 in the sustainability score is the difference between an indicative level of 20 and one of 30. This is a

highly significant difference in a small community and means that the way in which sustainability scores have been used is unjustified and unsound.

- h. The calculations in the Sustainability Assessment Framework are unsound. In at least one case they are inaccurate and arbitrary. In particular, the accurate score for Rattery is 19 not 23.5 (see Appendix E, p.11). The unsound nature of these calculations could lead to expectations of unsustainable development in small settlements.
- i. A blanket allocation of an indicative level of 10 to villages in the AONB is disproportionate and inappropriately simplistic. The strategy is not fully justified and alternatives do not appear to have been considered.
  - i. The villages in the AONB vary significantly in size and sustainability and the objectives described in JLP paragraph 5.158 would still be met if the larger, more sustainable, villages within the AONB were to have an indicative allocation higher than 10 and the smaller villages one lower than 10.
  - ii. Calculations of potential yield in these larger villages, based on SHLAA data and discounting sites which would not be suitable within the AONB, indicate that a higher indicative level is possible. (For details see Appendix F, P. 12.)
- j. In setting the indicative levels for Sustainable Villages the JLP fails to take into account other landscape designations such as Sites of Special Scientific Interest (SSSI).
  - i. This contradicts JLP Policy DEV28 which gives an extensive list of habitats to be protected.
  - ii. This contradicts the final sentence in para. 5.154 which indicates that more than one landscape designation should be used.
  - iii. No explanation is given in the JLP for the sole use of the AONB as the determining factor in the consideration of environmental sensitivity.
  - iv. For example, Rattery, the least sustainable of the villages with an indicative level of 20 dwellings, has a SSSI of international importance, County Wildlife Sites, areas of ancient woodland, and traditional orchards. An allocation to such a village of 20 - double that given to larger and more sustainable villages within the AONB - is therefore disproportionate.
- k. The JLP should employ a more sophisticated method of calculating a means to guide neighbourhood planning and to monitor delivery in Sustainable Villages. This would allow the JLP to meet more properly the objectives set out in para. 5.154:

*Rather, an approach is taken which aims to enable development to come forward in these villages which reflects their sustainability, and which will respond to local need. In these locations, it is clearly important to strike a balance so that development maintains or improves the viability of the villages whilst also being of an appropriate scale and meeting the needs of local people.*

- i. A recommended minimum target rather than a vague “about 10” etc. would provide a more robust means of monitoring plan delivery and a stronger basis for neighbourhood planning.
- ii. A minimum target should be calculated rather than an undefined “about” figure.
- iii. A figure should be calculated for each village rather than for groups of villages.
- iv. The calculation should be a function of an accurate sustainability score, which can be adjusted to take into account environmental factors such as location within the AONB.

- v. An example of such an approach is described in Appendix G, p.13. This produces a proportionate minimum requirement for each village which accurately reflects each village's sustainability as well as affording protection for villages within the AONB.

**3. The JLP should clarify what is meant by “separate planning studies” in para. 5.12 And “informal planning studies” in para. 5.157.**

- a. The JLP should clarify the extent to which Parish Councils would be involved and consulted as part of those activities.
- b. The JLP should clarify how the Local Planning Authority will collaborate with Parish Councils in those parishes without a Neighbourhood Plan.

**4. The JLP should clarify whether or not any development under JLP Policy TTV31 .1 (see below) counts towards the indicative level of housing for a particular settlement.**

*Housing and employment development adjoining or very near to an existing settlement will only be supported where it meets the essential, small scale local development needs of the community and provides a sustainable solution.*

**5. The objectives identified in para. 5.158 should apply to all Sustainable Villages not only to those in the AONB. Any single development in any of the Sustainable Villages should be on a small scale.**

- a. The JLP in para. 5.159 establishes the special nature of the rural part of the plan area:  
*The countryside of South West Devon is some of the finest in the county,...*
- b. Given the special nature of the landscape, the protection identified in para. 5.158 should, and could, be afforded to the entire area and not solely to the AONB.
- c. There is no impediment to this proposal as the indicative number of new dwellings could easily be achieved in all Sustainable Villages even if housing developments were limited to those at a small scale of below 10.
- d. Paragraph 5.158 should read:

*Development in or adjoining Sustainable Villages should not be of such a scale that will result in significant landscape impact or pose a threat to the integrity of the special qualities of the area. Neighbourhood plans for sustainable villages are encouraged to identify small scale sites of below 10 dwellings if available, to limit the potential impact on sensitive landscapes.*

# Appendix A

## SHLAA Assessment of land adjacent to Garden Close, Rattery

### SHLAA 2016

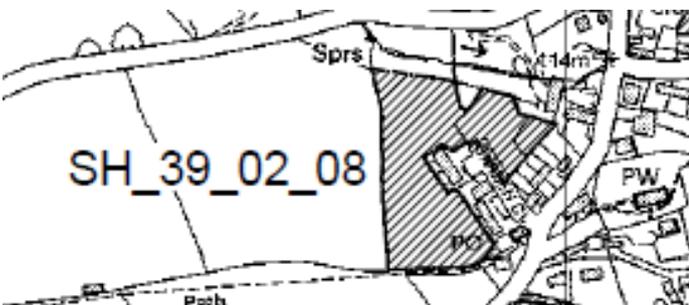
*Rattery is a small village located in the east of the district. It has a very limited provision of local services. Due to the lack of facilities in this location, any development will lead to an increase in use of the private car and is therefore considered to be an unsuitable area for development.*

Only one site, SH\_39\_02\_08/13, was identified as having potential for development.



2016  
SH\_39\_02\_08/13  
0.67ha  
Potentially suitable only if the VHI is developed to the North.

SH\_39\_02\_08/13 is part of a larger site, SH\_39\_02\_08, identified in the 2009 SHLAA has having the capacity to provide 15 units.



2009  
SH\_39\_02\_08  
1.4ha  
15 units  
Yield reduced due to Highways constraints.

The VHI development of 12 units was completed on the northern part of the larger site SH\_39\_02\_08 . This leaves a yield of 3 for the remainder of the site of which SH\_39\_02\_08/13 is a part.

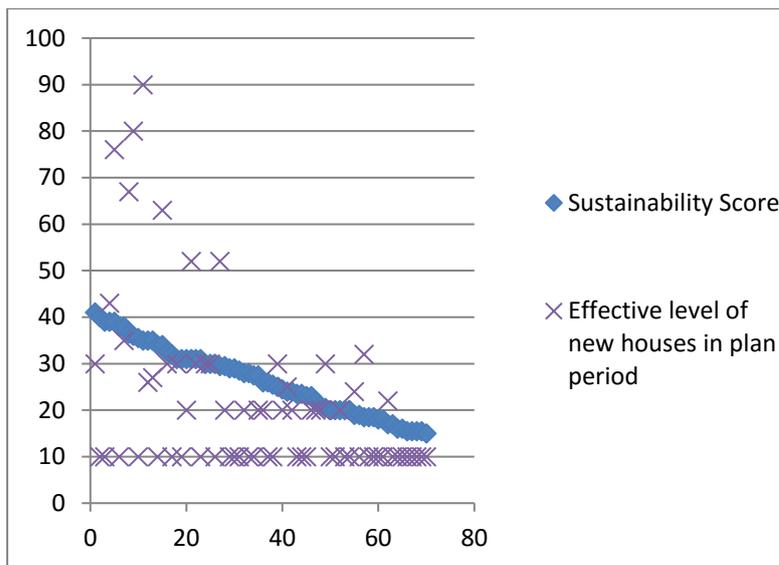
In the housing topic paper (Provision and Supply) March 2017 this site, SH\_39\_02\_08/13, is inaccurately assessed as potentially yielding 15 units.

## Appendix B

Only 16 of the Sustainable Villages have housing completions and commitments.

If the completions and commitments are not taken into account the in making indicative levels then the effective level of new houses in the plan period become grossly disproportionate in those 16 communities.

The table and graph below show the effective level of new houses in the affected villages.



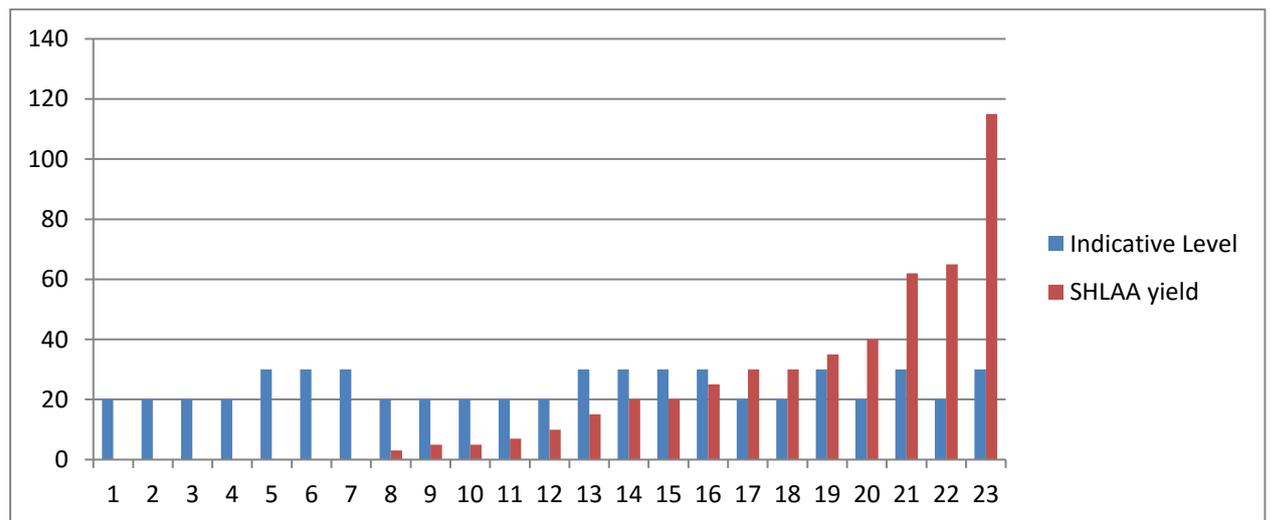
| Village            | Sustainability Score | Completions and Commitments | JLP Indicative Level | Effective level of new houses in plan period |
|--------------------|----------------------|-----------------------------|----------------------|--|
| Harbertonford      | 41                   |                             | 30                   | 30   |
| Aveton Gifford     | 40                   |                             | 10                   | 10   |
| Brixton            | 39                   |                             | 10                   | 10   |
| Malborough         | 39                   | 33                          | 10                   | 43   |
| Wembury            | 39                   | 66                          | 10                   | 76   |
| Kingswear          | 38                   |                             | 10                   | 10   |
| Stoke Fleming      | 38                   | 25                          | 10                   | 35   |
| Marldon            | 36.5                 | 37                          | 30                   | 67   |
| Loddiswell         | 36                   | 70                          | 10                   | 80   |
| Holbeton           | 35.5                 |                             | 10                   | 10   |
| Blackawton         | 35                   | 60                          | 30                   | 90   |
| Newton Ferrers     | 35                   | 16                          | 10                   | 26   |
| West Alvington     | 35                   | 17                          | 10                   | 27   |
| Slapton            | 34                   |                             | 10                   | 10   |
| Stoke Gabriel      | 34                   | 53                          | 10                   | 63   |
| Bridestowe         | 32.5                 |                             | 30                   | 30   |
| West Charleton     | 32                   |                             | 10                   | 10   |
| Exbourne           | 31                   |                             | 30                   | 30   |
| Frogmore           | 31                   |                             | 10                   | 10   |
| Northew            | 31                   |                             | 20                   | 20   |
| Sparkwell          | 31                   | 22                          | 30                   | 52   |
| Spreyton           | 31                   |                             | 30                   | 30   |
| Thurleston         | 31                   |                             | 10                   | 10   |
| East Allington     | 30                   |                             | 30                   | 30   |
| Lewdon             | 30                   |                             | 30                   | 30   |
| Strete             | 30                   |                             | 10                   | 10   |
| Ermington          | 29.5                 | 32                          | 20                   | 52   |
| Lee Mill           | 29.5                 |                             | 20                   | 20   |
| Bucklad Monachorum | 29                   |                             | 10                   | 10   |
| Churchstow         | 29                   |                             | 10                   | 10   |
| St Ann's Chapel    | 28.5                 |                             | 10                   | 10   |
| Highhampton        | 28                   |                             | 20                   | 20   |
| Torcross           | 28                   |                             | 10                   | 10   |
| Dittisham          | 27.5                 |                             | 10                   | 10   |
| Lamerton           | 27.5                 |                             | 20                   | 20   |
| Harberton          | 26                   |                             | 20                   | 20   |
| Hope Cove          | 26                   |                             | 10                   | 10   |
| Bere Ferrers       | 25.5                 |                             | 10                   | 10   |
| Staverton          | 25                   | 10                          | 20                   | 30   |
| Halwell            | 24.5                 |                             | 20                   | 20   |
| Diptford           | 24                   | 15                          | 10                   | 25   |
| Milton Abbot       | 24                   |                             | 20                   | 20   |
| Crapstone          | 23.5                 |                             | 10                   | 10   |
| Down Thomas        | 23.5                 |                             | 10                   | 10   |
| Avonwick           | 23                   |                             | 10                   | 10   |
| Sampford Courtney  | 23                   |                             | 20                   | 20   |
| Woolston Green     | 22                   |                             | 20                   | 20   |
| Bratton Clovelly   | 21                   |                             | 20                   | 20   |
| Ugborough          | 20.5                 |                             | 30                   | 30   |
| Noss Mayo          | 20                   |                             | 10                   | 10   |
| Beesands           | 20                   |                             | 10                   | 10   |
| Berry Pomeroy      | 20                   |                             | 20                   | 20   |
| Bigbury            | 20                   |                             | 10                   | 10   |
| Cornworthy         | 20                   |                             | 10                   | 10   |
| Folly Gate         | 19                   | 14                          | 10                   | 24   |
| Lee Moor           | 19                   |                             | 10                   | 10   |
| Rattery            | 18.5                 | 12                          | 20                   | 32   |
| Kingston           | 18.5                 |                             | 10                   | 10   |
| Ringmore           | 18.5                 |                             | 10                   | 10   |
| Ashprington        | 18                   |                             | 10                   | 10   |
| Broadwoodkelly     | 18                   |                             | 10                   | 10   |
| Moreleigh          | 17                   | 12                          | 10                   | 22   |
| Stowford           | 17                   |                             | 10                   | 10   |
| Inwardleigh        | 16                   |                             | 10                   | 10   |
| Sydenham Damerel   | 16                   |                             | 10                   | 10   |
| East Prawle        | 15.5                 |                             | 10                   | 10   |
| Wotter             | 15.5                 |                             | 10                   | 10   |
| South Milton       | 15.5                 |                             | 10                   | 10   |
| Wrangaton          | 15.5                 |                             | 10                   | 10   |
| Monkokehampton     | 15                   |                             | 10                   | 10   |

## Appendix C

Although the JLP asserts that SHLAA data has been used to set the indicative levels of housing for the Sustainable Villages (JLP Paragraphs 5.13 and 5.156), there is no correlation between the indicative levels and the calculation of yield from SHLAA data made in Housing Topic Paper Provision and Supply March 2017.

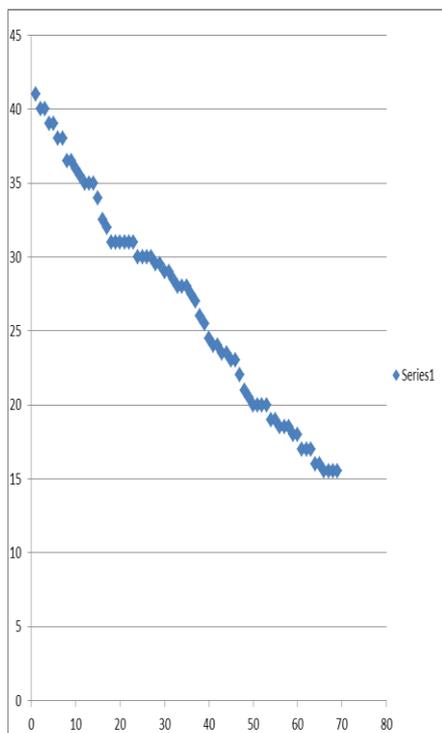
The chart below compares the SHLAA yield (between 0 and 115 houses) and the indicative level for the 23 villages with indicative levels of 20 and 30.

The villages with indicative levels of 10 are not included because of the blanket allocation of 10 to villages in the AONB.



## Appendix D

The distribution of scores in the Sustainability Assessment Framework does not support the JLP allocation of villages into three bands with breaks at 10, 20 and 30. The current division into these three bands is arbitrary.



Distribution of Village Totals

Sustainability Assessment Framework

The break points used to produce the grouping shown in J.L.P. Figure 5.8 are:

30 and above = Indicative Level of 30

20 and above = Indicative Level of 20

## Appendix E

The scoring for Rattery in the South Hams and West Devon Sustainability Framework is inaccurate and out of date and should be changed.

Following discussions with the Joint Councils and a review of the data the sustainability score for Rattery is reduced to 18.5. This places Rattery in the group of villages outside the AONB for which the allocation is 10, rather than the 20 currently allocated to Rattery.

| Factor                                   | Value | Current score for Rattery | Revised score | Notes   |
|--|-------|---------------------------|---------------|---|
| Village Shop                             | 3     | 1.5                       | 0             | Rattery has no shop   |
| Post Office                              | 2     | 1                         | 0.5           | The mobile post office is open only for 1 hour per week   |
| Access to employment by public transport | 2     | 2                         | 0             | Rattery has no public transport   |
| PROW                                     | 2     | 2                         | 1             | Rattery is in the lowest 20% in Devon for PROW  |
| Mobile phone coverage                    | 2     | 2                         | 1             | This brings Rattery into line with the 15 other villages with the same level of coverage.   |
| Community Bus Service                    | 2     | 2                         | 1             | The only community service to Rattery works to a fixed schedule and does not offer the flexibility of dial and ride services enjoyed by other villages. |
| Commercial Bus Service                   | 1     | 1                         | 0             | There is no commercial bus service  |

## Appendix F

The table below shows the potential yield, omitting sites not suitable for AONB, for the 3 most sustainable villages within the AONB as identified in Housing Topic Paper Provision and Supply March 2017.

| Village        | Sustainability Score | JLP Indicative Level | Potential Yield |
|----------------|----------------------|----------------------|-----------------|
| Aveton Gifford | 40                   | 10                   | 30+             |
| Brixton        | 39                   | 10                   | 20              |
| Malborough     | 39                   | 10                   | 40              |

Other much smaller villages within the AONB which have sustainability scores of below 20 are also given an indicative level of 10. This is clearly disproportionate.

All the villages are listed with their sustainability score in Appendix G, p.13.

## Appendix G

The table below demonstrates a more proportionate and accurate way of determining levels of housing in the Sustainable Villages.

- The **Sustainability Score** is taken from the South Hams and West Devon Sustainability Framework.
- This score is then reduced by a factor of 0.5 for villages in the AONB (in red) to give the **Adjusted Sustainability Score**. (Other factors could be taken into account but are not included in this example of an alternative methodology.)
- The **JLP Indicative Level** is shown for comparison.
- The **Formula Minimum Level** is calculated as a function of the **Adjusted Sustainability Score**. The calculation is the total number of houses required divided by the total of the Adjusted Sustainability Scores. The minimum level for any particular village is thus determined by the measure of sustainability of that village.
- The total number of houses required is set at 1234, in excess of the 1214 required to meet the housing supply predictions of JLP Figure 3.3. This figure is reduced to 1000 for the purposes of the calculation to allow for the number of completions and commitments in excess of the requirement for certain villages, labelled as **Bonus**.
- **Completions 2014-16** are from the Thriving Towns and Villages Housing Trajectory and include commitments.
- **Minimum New Houses 2017-34** is the number of new houses required in each village in addition to any completions and commitments. This forms a reliable guide for neighbourhood planning and plan monitoring.

Villages in the AONB are shown in red.

| Village                    | Sustainability Score | Adjusted Sustainability Score | JLP Indicative Level | Formula Minium Level 2014-34 | Completions 2014-6 | Minimum New Houses 2017-34 | Bonus |
|----------------------------|----------------------|-------------------------------|----------------------|------------------------------|--------------------|----------------------------|-------|
| Harbertonford              | 41                   | 41                            | 30                   | 31                           |                    | 31                         |       |
| <b>Aveton Gifford</b>      | 40                   | 20                            | 10                   | 15                           |                    | 15                         |       |
| <b>Brixton</b>             | 40                   | 20                            | 10                   | 15                           |                    | 15                         |       |
| <b>Malborough</b>          | 39                   | 19.5                          | 10                   | 15                           | 33                 | 0                          | 18    |
| <b>Wembury</b>             | 39                   | 19.5                          | 10                   | 15                           | 66                 | 0                          | 51    |
| <b>Kingswear</b>           | 38                   | 19                            | 10                   | 14                           |                    | 14                         |       |
| <b>Stoke Fleming</b>       | 38                   | 19                            | 10                   | 14                           | 25                 | 0                          | 11    |
| Marldon                    | 36.5                 | 36.5                          | 30                   | 27                           | 37                 | 0                          | 10    |
| <b>Stoke Gabriel</b>       | 36.5                 | 18.25                         | 10                   | 14                           | 53                 | 0                          | 39    |
| <b>Loddiswell</b>          | 36                   | 18                            | 10                   | 13                           | 70                 | 0                          | 57    |
| <b>Holbeton</b>            | 35.5                 | 17.75                         | 10                   | 13                           |                    | 13                         |       |
| Blackawton                 | 35                   | 35                            | 30                   | 26                           | 60                 | 0                          | 34    |
| <b>Newton Ferrers</b>      | 35                   | 17.5                          | 10                   | 13                           | 16                 | 0                          | 3     |
| <b>West Alvington</b>      | 35                   | 17.5                          | 10                   | 13                           | 17                 | 0                          | 4     |
| <b>Slapton</b>             | 34                   | 17                            | 10                   | 13                           |                    | 13                         |       |
| Bridestowe                 | 32.5                 | 32.5                          | 30                   | 24                           |                    | 24                         |       |
| <b>West Charleton</b>      | 32                   | 16                            | 10                   | 12                           |                    | 12                         |       |
| Exbourne                   | 31                   | 31                            | 30                   | 23                           |                    | 23                         |       |
| <b>Frogmore</b>            | 31                   | 15.5                          | 10                   | 12                           |                    | 12                         |       |
| Northew                    | 31                   | 31                            | 20                   | 23                           |                    | 23                         |       |
| Sparkwell                  | 31                   | 31                            | 30                   | 23                           | 22                 | 1                          |       |
| Spreyton                   | 31                   | 31                            | 30                   | 23                           |                    | 23                         |       |
| <b>Thurleston</b>          | 31                   | 15.5                          | 10                   | 12                           |                    | 12                         |       |
| <b>Dittisham</b>           | 30                   | 15                            | 10                   | 11                           |                    | 0                          |       |
| East Allington             | 30                   | 30                            | 30                   | 22                           |                    | 22                         |       |
| Lewdon                     | 30                   | 30                            | 30                   | 22                           |                    | 22                         |       |
| <b>Strete</b>              | 30                   | 15                            | 10                   | 11                           |                    | 11                         |       |
| Ermington                  | 29.5                 | 29.5                          | 20                   | 22                           | 32                 | 0                          | 10    |
| Lee Mill                   | 29.5                 | 29.5                          | 20                   | 22                           |                    | 22                         |       |
| <b>Buckland Monachorum</b> | 29                   | 14.5                          | 10                   | 11                           |                    | 11                         |       |
| <b>Churchstow</b>          | 29                   | 14.5                          | 10                   | 11                           |                    | 11                         |       |
| <b>St Ann's Chapel</b>     | 28.5                 | 14.25                         | 10                   | 11                           |                    | 11                         |       |
| Harberton                  | 28                   | 28                            | 20                   | 21                           |                    | 21                         |       |
| Highhampton                | 28                   | 28                            | 20                   | 21                           |                    | 21                         |       |
| <b>Torcross</b>            | 28                   | 14                            | 10                   | 10                           |                    | 10                         |       |
| Lamerton                   | 27.5                 | 27.5                          | 20                   | 20                           |                    | 20                         |       |
| Staverton                  | 27                   | 27                            | 20                   | 20                           | 10                 | 10                         |       |
| <b>Hope Cove</b>           | 26                   | 13                            | 10                   | 10                           |                    | 10                         |       |
| <b>Bere Ferrers</b>        | 25.5                 | 12.75                         | 10                   | 9                            |                    | 9                          |       |
| Halwell                    | 24.5                 | 24.5                          | 20                   | 18                           |                    | 18                         |       |
| <b>Diptford</b>            | 24                   | 12                            | 10                   | 9                            | 15                 | 0                          | 6     |
| Milton Abbot               | 24                   | 24                            | 20                   | 18                           |                    | 18                         |       |
| <b>Crapstone</b>           | 23.5                 | 11.75                         | 10                   | 9                            |                    | 9                          |       |
| <b>Down Thomas</b>         | 23.5                 | 11.75                         | 10                   | 9                            |                    | 9                          |       |
| <b>Avonwick</b>            | 23                   | 11.5                          | 10                   | 9                            |                    | 9                          |       |
| <b>Sampford Courtney</b>   | 23                   | 11.5                          | 20                   | 9                            |                    | 9                          |       |
| Woolston Green             | 22                   | 22                            | 20                   | 16                           |                    | 16                         |       |
| Bratton Clovelly           | 21                   | 21                            | 20                   | 16                           |                    | 16                         |       |
| Ugborough                  | 20.5                 | 20.5                          | 20                   | 15                           |                    | 15                         |       |
| <b>Beesands</b>            | 20                   | 10                            | 10                   | 7                            |                    | 7                          |       |
| Berry Pomeroy              | 20                   | 20                            | 20                   | 15                           |                    | 15                         |       |
| <b>Cornworthy</b>          | 20                   | 10                            | 10                   | 7                            |                    | 7                          |       |
| <b>Noss Mayo</b>           | 20                   | 10                            | 10                   | 7                            |                    | 7                          |       |
| Folly Gate                 | 19                   | 19                            | 10                   | 14                           | 14                 | 0                          |       |
| Lee Moor                   | 19                   | 19                            | 10                   | 14                           |                    | 14                         |       |
| <b>Kingston</b>            | 18.5                 | 9.25                          | 10                   | 7                            |                    | 7                          |       |
| Rattery                    | 18.5                 | 18.5                          | 10                   | 14                           | 12                 | 2                          |       |
| <b>Ringmore</b>            | 18.5                 | 9.25                          | 10                   | 7                            |                    | 7                          |       |
| <b>Ashprington</b>         | 18                   | 9                             | 10                   | 7                            |                    | 7                          |       |
| Broadwoodkelly             | 18                   | 18                            | 10                   | 13                           |                    | 13                         |       |
| <b>Bigbury</b>             | 17                   | 8.5                           | 10                   | 6                            |                    | 6                          |       |
| Moreleigh                  | 17                   | 17                            | 10                   | 13                           | 12                 | 1                          |       |
| Stowford                   | 17                   | 17                            | 10                   | 13                           |                    | 13                         |       |
| Inwardleigh                | 16                   | 16                            | 10                   | 12                           |                    | 12                         |       |
| <b>Sydenham Damerel</b>    | 16                   | 8                             | 10                   | 6                            |                    | 6                          |       |
| <b>East Prawle</b>         | 15.5                 | 7.75                          | 10                   | 6                            |                    | 6                          |       |
| <b>South Milton</b>        | 15.5                 | 7.75                          | 10                   | 6                            |                    | 6                          |       |
| Wotter                     | 15.5                 | 15.5                          | 10                   | 12                           |                    | 12                         |       |
| Wrangaton                  | 15.5                 | 15.5                          | 10                   | 12                           |                    | 12                         |       |
| Monkokehampton             | 15                   | 15                            | 10                   | 11                           |                    | 11                         |       |
| Totals                     |                      | 1332                          | 1020                 | 991                          | 494                | 741                        | 243   |
| TOTAL DELIVERY 2014 -2034  |                      |                               |                      |                              |                    | 1235                       |       |