

**Plymouth and South West Devon Joint Local Plan
Examination**

**Response to Inspectors' Matters Issues and Questions
for the Examination Hearings**

JLP Councils

**Matter 8 - Policy Area Strategies: Thriving Towns and
Villages**

JLP Councils: 8 January 2018

JLP Councils PSWDJLP Examination Hearing Statement – Matter 8

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APPENDIX 1 – Response to Question 8.2iii (c and d) and 8.5i (a and c)

Matter 8 Policy Area Strategies: Thriving Towns and Villages

Main Issue - Does the JLP provide a robust framework for the management and delivery of development across the Thriving Towns and Villages Policy Area (TTVPA) that is justified, effective and consistent with national policy?

(Note: Housing site allocations within the TTVPA will be considered under section 8.5 'Housing delivery within the TTVPA')

Evidence Base and Submission documents referenced in this Matter Statement

- [Housing Distribution Topic Paper \(TP1\)](#)
- [Integrated Assessment \(SUB9\)](#)
- [Appendix VIII: Plymouth and South West Devon Local Plan Integrated Assessment: Assessment of Reasonable Alternatives – Site Selection Process - Thriving Towns and Villages Policy Area \(SUB9H\)](#)
- [Thriving Towns and Villages Settlement Boundary Topic Paper \(TP2\)](#)
- [Infrastructure Delivery Plan \(O10\)](#)
- [Plymouth and South West Devon Joint Local Plan Viability Study \(O5\)](#)
- [Summary of allocated and rejected sites EXC3D](#)
- [South Hams and West Devon Village Sustainability Assessment Framework \(O6\)](#)
- [Strategic Housing Land Availability Assessment Final Report \(HO4\)](#)
- [Site Information Packs \(South Hams\) A-D \(HO4A\)](#)
- [Site Information Packs \(South Hams\) E-L \(including Sherford, Moreleigh and Ugborough\) \(HO4B\)](#)
- [Site Information Packs \(South Hams\) M-R \(HO4C\)](#)
- [Site Information Packs \(South Hams\) S-T \(HO4D\)](#)

- [Site Information Packs \(South Hams\) U-Z \(HO4E\)](#)
- [South Hams and West Devon Strategic Housing Land Availability Assessment Viability Report \(H03\)](#)
- [Threshold Land Values report to inform the Strategic Development Viability Assessment for both South Hams and West Devon \(H09\)](#)
- [Site Information Packs \(West Devon\) A-L \(including Thrushelton\) \(HO4F\)](#)
- [Site Information Packs \(West Devon\) M-Z \(HO4G\)](#)
- [Strategic Housing Market Assessment Part 1: The Housing Market Area and Updating the Objectively Assessed Need \(HO13\)](#)
- [Thriving Towns and Villages Policy Area Housing Trajectory \(TP3C\)](#)
- [Thriving Towns and Villages Policy Area Housing Trajectory \(reformatted TP3C\) \(TCP3i\)](#)
- [Thriving Towns and Villages Policy Area Housing Trajectory updated to the March 2017 monitoring point \(referenced in paragraph 1.9 of EXC3\) \(TCP3G\)](#)
- [Plymouth Policy Area Housing Trajectory Agreement \(referenced in paragraph 1.9 of EXC3\) \(TCP3H\)](#)
- [Thriving Towns and Villages Housing Trajectory Agreement \(referenced in paragraph 1.9 of EXC3\) \(TCP3I\)](#)

Issue 8.1: Approach to development (Policies TTV1 and TTV2)

Question 8.1(i)

Is the hierarchy of sustainable settlements in Policy TTV1 and the settlements within each level of the hierarchy identified in the supporting text justified? Is the assessment framework used to determine if a settlement is 'sustainable' appropriate and justified?

- 8.1 Yes, in response to the first part of the question, the use of the hierarchy of settlements to deliver the TTV development strategy is justified. The strategy is established through the Integrated Assessment (SUB9, paragraph 5.37 page 41) with further exploration of the issues within the Housing Distribution Topic Paper (TP1), which concludes that the preferred option for the distribution strategy was one of urban concentration, avoiding widespread rural dispersal of development and taking account of the sensitive landscapes of the National Park and AONBs (TP1 page 34). Apportioning growth throughout the settlement hierarchy of the plan area, in quantities broadly proportionate to the size and role of existing settlements, is an approach that is consistent with the historic categorisation of settlements by both Local Planning Authorities (LPAs) in the Thriving Towns and Villages Policy area. The JLP seeks to deliver housing and employment development throughout the hierarchy of existing settlements, which is an approach that accords with paragraph 10 of the NPPF, in that it "take(s) local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas". Such an approach can also be seen to accord strongly with one of the Core Planning Principles of NPPF paragraph 17; "(Planning should) take account of the different roles and character of different areas, promoting the vitality of our main

urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.”

- 8.2 In distributing growth proportionally throughout the TTV settlement hierarchy the JLP seeks to meet the development needs of the plan area in the most sustainable locations, aligning the JLP with paragraphs 8, 9 and 14 of the NPPF. In addition to the Housing Distribution Topic Paper, section 5 of the Integrated Assessment considers reasonable alternatives of growth figures and development strategies. The approach selected makes provision for growth that can support our existing settlements, enabling community resilience and vitality, but not at the expense of the natural environment, much of which is designated and highly sensitive.
- 8.3 The categorisation of the main towns within the TTV policy area is consistent with the historic approach taken by South Hams and West Devon councils. The main towns are clearly distinct within the pattern of settlements, on account of their scale, range of services and facilities, connectivity and established town councils.
- 8.4 The second tier of the settlement hierarchy is again an echo of historic categorisation within both areas, albeit these were previously known as 'local centres'. To avoid confusion between retail centre categorisation within the PPA, the second tier of settlements within the TTV policy area are called 'Small Towns and Key Villages'. These settlements are characterised in part by the range of services and facilities contained within the settlements themselves, but also by the extent of dependent hinterlands surrounding them. This tier of the hierarchy displays some

differences between the settlements of South Hams and West Devon. The small towns of South Hams are slightly larger in scale and population than those in West Devon, and the same applies to the key villages. What these settlements all have in common is the role and function that they perform within the wider settlement pattern.

- 8.5 One significant difference between the historic hierarchy of settlements that is being used within the TTV policy area is the re-classification of Dartington as a key village. This is justified by the village sustainability assessment as included within evidence document O6. The assessment framework apportioned a score out of 49 for each village, based on the level of services, facilities and connectivity. Dartington scored so highly (44 points) as to make it clearly distinct from any of the other villages, and to such an extent that it was considered appropriate to propose moving it to the second tier of settlements. Other villages, notably Brixton and Harbertonford, also scored over 40 points, but are constrained by factors such as landscape sensitivity and flood risk. Dartington is not similarly constrained, and is significantly better connected than these villages, and as such it was included within the Regulation 19 draft of the JLP as a Key Village.
- 8.6 The Strategy Topic Paper (TP5) explores the functional relationship between Plymouth and the settlements of the Thriving Towns and Villages policy area.
- 8.7 Yes, in response to the second part of the question, the assessment framework used to determine if a settlement is 'sustainable' is both appropriate and justified.

- 8.8 It is appropriate because there needs to be a distinction between a sustainable settlement and the countryside in terms of policy application. Without an assessment of the sustainability of rural villages it would be very difficult to consistently apply the Development in the Countryside policy. This would be likely to result in ad hoc and isolated assessments of rural sustainability with no wider context of settlement pattern, with no understanding of how settlements relate to each other, and with no understanding of how rural communities behave in terms of accessing employment and services.
- 8.9 NPPF paragraph 10 requires that "Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas." Whilst the upper two tiers of the settlement hierarchy in the TTV policy area is historically accepted, the settlement sustainability assessment for the villages accords strongly with paragraph 10, in that it provides a robust examination of local circumstances, providing a consistent baseline for applicants and decision makers to respond to.
- 8.10 The assessment itself was the subject of two rounds of public consultation, during September and December 2016. The first consultation sought input on the criteria and weighting used within the framework. The second consultation sought feedback on the draft scores for each village following the application of the assessment framework. A summary of the consultation phases, and the outcomes of the assessment, can be found within evidence document O6.

8.11 Following the Regulation 19 consultation minor modifications have been made to the assessment tables, resulting in amendments to the scores of a small number of villages.

Question 8.1(ii)

Where settlement boundaries are identified are they justified and do they take account of any outstanding planning permissions?

8.12 Yes, the use of settlement boundaries is justified. NPPF para 154 requires that "Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan." The use of settlement boundaries provides a clear indication as to where settlements end and the countryside begins, and as such where the application of policy TTV31 – Development in the Countryside will apply.

8.13 When reviewing and redrawing the settlement boundaries throughout the TTVPA a clear and consistent rationale was applied, which included taking into account outstanding planning permissions, historic development allocations and sites under construction. The approach and boundaries are set out in the Thriving Towns and Villages Settlement Boundary Topic Paper (TP2).

Question 8.1(iii)

Figure 5.1 on p176 of the JLP identifies site allocation totals by settlement type and also includes an allowance for Sustainable Villages.

a. Can the figures be updated to 2017? Would their inclusion within Policy TTV1 aid certainty?

8.14 Yes, the figures about JLP allocations the Sustainable Villages allowance have been updated to the 31 March 2017 monitoring point and are set out in the table below.

8.15

Settlement Type	New Homes 2014 to 2034
Main Towns	4,441
Smaller Towns and Key Villages	961
Sustainable Villages	650

8.16 It is not considered that inclusion within TTV1 would be appropriate, however, since the approach of the plan is to allow flexibility in the number of dwellings that come forward in each settlement. The allocations themselves are policies in their own right, and it is this that the Council considers the appropriate mechanism to provide certainty.

- a. As the figures only relate to allocations how much development is proposed to be delivered through existing uncompleted commitments?

8.17 The number of residential properties that will be delivered is XX ... answer needs to align with the Housing Topic paper

- b. How has the distribution of development across the settlements been determined and is it supported by evidence?

8.18 With reference to paragraph 8.1 of this Hearing Statement the Integrated Assessment has informed the approach to the distribution of development. Deliverable sites have then been

selected from the SHLAA and tested against that distribution and against local constraints. Consultees have responded to the proposed distribution at the formal Regulation 18 and Regulation 19 stages and this has further informed the distribution, scope and nature of development proposals.

Question 8.1(iv)

Policy TTV2 seeks to deliver sustainable development in the TTVPA and lists specific attributes of rural sustainability. As the policies in the JLP when considered as a whole should form the framework for delivering sustainable development within the plan area, is the policy justified and is it clear how it will be used when considering development proposals? (Also refer to Matter 2 Q ii regarding Policies SPT1 and SPT2)

8.19 Yes, directly related to NPPF para 10, which states “Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.”

8.20 In the TTV policy area, where the sustainability of rural settlements requires different consideration from that of the urban area of Plymouth, policy TTV2 should be read alongside the SPT policies to form a comprehensive framework for delivering sustainable development in the more rural parts of the plan area.

Issue 8.2: Main Towns (Policies TTV3 to TTV28)

Question 8.2(i)

Is the purpose of the 'spatial priorities for development' policies for each Main Town clear? How will the policies be used by a decision-maker when considering development proposals?

8.21 The purpose of the spatial priorities for development (Policies TTV4, Dartmouth; TTV7, Ivybridge; TTV12, Kingsbridge; TTV16, Okehampton; TTV20, Tavistock; and TTV25, Totnes) is to provide local context and clarity with respect to the strategic infrastructure lists provided in TTV3; and, consequently, clarity to developers and decision makers with respect to the matters to be addressed by development proposals.

8.22 A decision maker would then seek to ensure that the requirements are met through individual developments and / or combinations of developments in the respective settlements through direct provision and / or s106 Agreements. The TTV SPD will provide further guidance with respect to when and how the requirements are to be met.

Question 8.2(ii)

Are the strategic infrastructure measures for the Main Towns listed in Policy TTV3 effective and justified?

8.23 An Infrastructure Needs Assessment was prepared following consultation with infrastructure providers; and this informed the Infrastructure Delivery Plan (O10). The express purpose of the IDP, as highlighted in the title of Section 4 of that document, is to ensure S106 and CIL can make the most effective contribution to

funding key infrastructure, and protecting local communities. The measures described in the IDP have informed the requirements of each allocation.

8.24 Infrastructure requirements have been taken into consideration in the preparation of the Plymouth and South West Devon Joint Local Plan Viability Study (see Table 3.1, O5). Viability in this respect has been further tested by the Councils and this has informed a consideration of funding for the infrastructure identified in the IDP. A summary table is provided at page 16 of the IDP.

8.25 Decision makers will be informed by the IDP and policy requirements, but would revisit viability in accordance with the provisions of paragraph 173 of the NPPF and in the light of any changed circumstances raised by the various consultees during the course of pre-application and / or dealing with a planning application.

Question 8.2(iii)

In relation to the site allocations proposed for employment, retail, leisure and other commercial development within the main towns (housing site allocation questions are in 8.5 below):

(note typographical error, there is no a or b in the Inspector's questions)

c. Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?

d. Is the development deliverable in the timescales envisaged?

8.26 The JLP Councils consider that all of the site allocations put forward in the plan are both justified and deliverable over the plan period, and that they have adequately taken account of appropriate issues,

having regard also to the Development (DEV) policies of the plan which are equally applicable to allocated as well as non-allocated sites.

8.27 A summary schedule of the reasons for allocation of each site can be found in Table 2 of the Summary of Allocated and Rejected Sites (EXC3D). Additionally, a schedule of commercial site allocations which responds to the specific questions raised by the Inspectors (with key documents sign-posted) can be found in Appendix 1 of this Hearing Statement. Our responses are to be understood within the context of the approach we have taken to the identification of site allocations as explained below.

8.28 The approach we have taken to the allocations is considered to be consistent with the requirements of the Framework. The key elements of this approach include:

1. Identifying sufficient sites to meet any objectively assessed need identified (consistent with para 17 of the Framework, third bullet point, and para 157, fifth bullet point). This is especially important for housing and employment, and this is considered more fully in Hearing Statements 3 and 5. In order to demonstrate that the plan does make adequate provision in relation to housing and employment, an indication of the appropriate quantum of development is identified in the site allocation policy (see para. 1.18 of the Submission JLP, SUB1).
2. Identifying only sites that are considered to be suitable for the particular type of development, preferring land of lesser environmental value (consistent with para 17 of the Framework, third and seventh bullet points, and para 110). Each allocated

site has been assessed through the Sustainability Appraisal and is considered to be suitable for the purposes set out in the plan.

3. Identifying sites that are considered to be deliverable over the plan period (consistent with para 182 of the Framework, third bullet point). Para. 47 of the Framework deals with the question of housing delivery. It distinguishes between identifying a 'deliverable' five year supply of sites, and a 'developable' set of sites outside of this five year period. Footnote 12 says that a site is 'developable' where 'there is a reasonable prospect that the site is available and could be viably developed at the point envisaged'. The Framework is silent on the matter of a deliverability test for non-housing developments. However, given that there is no requirement for a five year supply of non-housing sites, the JLP Councils consider it reasonable to assume that a test more akin to the 'develop-ability' test is appropriate. This is not considered to conflict with para 173 of the Framework which is about the deliverability of the plan as a whole, and ensuring that there are not undue policy burdens in the plan to make its allocations unviable.
4. Using evidence about a site's availability in considering whether to allocate the site (consistent with para 159 of the Framework, second bullet point; and para 161, second bullet point). This is particularly significant in relation to housing uses and the need to demonstrate a five year housing land supply.
5. Identifying a range of sites to meet the scale and type of retail, leisure, commercial, office and other uses; particularly to ensure that needs for these uses are not compromised by limited site availability (consistent with para 23 of the Framework, 6th bullet point). Although the Framework advocates this principle particularly in the context of town centre uses, the JLP Councils

consider that this is a generally helpful principle, particularly in relation to employment uses generally (as considered in Matter Statement 5). The Councils consider it important to identify a range of suitable sites to provide flexibility for the market to meet the growth and sustainable community needs of the area, highlighting the investment opportunities that are available. In this respect the site allocation strategy is positive rather than restrictive.

6. Identifying sites as part of a positive planning strategy to promote development opportunities, to provide the market confidence about the investment opportunity (consistent with para 157 of the Framework, fifth bullet point).
7. Positively planning for flexible use of land where appropriate, e.g. through mixed use allocations which might be less prescriptive about a balance of uses where appropriate (consistent with para 157 of the Framework, fifth bullet point).
8. Providing guidance to the appropriate level on matters such as form, scale, access and quantum of development, without unnecessarily repeating provisions of other policies in the plan and being over-prescriptive (consistent with para 157 of the Framework, fifth bullet point). Our intended approach has been to only add points / criteria to site allocation policies where we feel it is helpful to identify something specific which may already be covered generically in a DEV policy.

8.29 The responses to the Inspectors' questions are identified in Appendix 1 at the end of this Matter Statement.

Question 8.2(iv)

In Policy TTV4 what does point 3 mean?

8.30 The Councils propose a minor modification (EXC10A, reference M122) in the narrative after the policy with the intention of providing clarification:

Paragraph 5.31 to be amended: 'The success of creating new communities in this area will depend upon the quality of connections between the lower town and Townstal, and how the new development relates to the AONB landscapes. **In this respect, the protection of the AONB including its setting, in accordance with Policy DEV27, is a key priority for the area.'**

Question 8.2(v)

Is a floorspace figure available for the Noss on Dart allocation in Policy TTV6?

8.31 The site currently accommodates commercial use and it has not been possible to quantify the existing amount of floorspace. The policy, consequently, assumes no net increase in employment floorspace.

Question 8.2(vi)

It has been suggested that as Noss on Dart is located within the Parish of Kingswear the housing numbers should contribute to Kingswear, a sustainable village rather than Dartmouth: can the Councils respond on this point please?

8.32 The housing element of the allocation would meet need in the context of its relationship with Dartmouth, which is a first tier settlement and accessible across the River Dart by car and foot ferry. The Council recognises that the site lies in the Parish of Kingswear and that appropriate s106 contributions would accrue in

accordance with the location, nature and scope of the impacts.
Council tax precepts would also accrue to Kingswear as the host
Parish.

Question 8.2(vii)

*In relation to Ivybridge is there reasonable consistency between the JLP
policies and the Neighbourhood Plan?*

8.33 The Councils propose a minor modification in this respect (EXC10A
reference M135), to Policy TTV7 criterion 8:
'8. Ensuring appropriate infrastructure is delivered alongside new
development, **including community facilities identified in Policy INP5
of the Ivybridge Neighbourhood Plan.**'

Issue 8.3: Smaller Towns and Key Villages (Policy TTV29)

Question 8.3(i)

In relation to the employment site allocations proposed for development within Policy TTV29 for the smaller towns and key villages (housing site allocation questions are in 8.5 below):

- a. Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?*
- b. Is the development deliverable in the timescales envisaged?*

8.34 Our approach to the identification of site allocation policies in the context of the Framework is set out in response to Question 8.2iii and is not repeated here.

8.35 The responses to the Inspectors' questions are identified in Appendix 1 at the end of this Matter Statement.

Question 8.3(ii)

Are the requirements of Policy TTV29, as set out in the final column of the table, justified?

8.36 Yes, the responses to the Inspectors' questions are identified in Appendix 1 at the end of this Matter Statement.

Question 8.3(iii)

Are any of the changes proposed by the Councils to the policy necessary for reasons of soundness? Are any other amendments required to make the policy sound?

8.37 No changes are proposed for reasons of soundness.

8.38 Minor modifications are, however, proposed for the purposes of clarification. These can be seen in EXC10A, references M172 to M197.

Issue 8.4: Sustainable Villages and the Countryside (Policies TTV30-32)

Question 8.4(i)

On what basis have the indicative levels of housing within each sustainable village as set out in Figure 5.8 of the JLP been determined?

8.39 The wider development strategy for the TTV policy area is outlined in policy TTV1, which proposes proportionate growth throughout the rural settlement hierarchy. The hierarchy identifies three different levels of settlement, Main Towns, Smaller Towns & Key Villages, and Sustainable Villages. The top two levels of the hierarchy are characterised by settlements that boast a range of services and facilities, and are well connected with each other, the rural transport network and digital infrastructure. Within the lower level of the hierarchy, a distinction needs to be drawn between a village that is sufficiently served with services and facilities, and is well connected enough, to be considered sustainable, and villages that should be considered as being within the countryside.

- 8.40 All villages are not created equal, and following a rigorous assessment of the numerous villages within the TTV policy area, it was apparent that within the TTV policy area there were villages that could be broadly described as small, medium and large in both scale and provision of services and facilities. The small villages have a sustainability 'score' of between 15 and 20. Medium villages between 20 – 30, and larger villages have a score of 30 or more.
- 8.41 The settlement assessment, including a summary of the consultation process that led to the assessment being created is contained within evidence document South Hams and West Devon Village Sustainability Assessment Framework (O6). The basis for the number of new homes identified for each settlement is to provide (relatively) more homes and jobs to the larger villages, and fewer to the smaller villages – as consistent with the wider development strategy - and to provide guidance to neighbourhood plans when considering appropriate scales of future growth.
- 8.42 The JLP does not seek to identify or allocate development sites within or adjacent to rural villages. Village scale allocation sites, whilst cumulatively important to housing supply, are not considered strategically important on an individual basis, and as such it is considered appropriate for small-scale development within and adjacent to villages to come forward through neighbourhood plans.
- 8.43 As well as providing a spatial understanding of how the concept of sustainability is understood within the TTV policy area, the additional benefit of identifying indicative numbers of housing for the villages is that it provides a framework that neighbourhood plan groups can use when identifying suitable patterns of growth when writing their plans.

- 8.44 The three distinct sizes of villages that were identified in the assessment informed the three different bands of housing numbers, 10, 20 and 30. In order to maintain what is often described as an 'organic' rate of change within the rural villages, the aim was to establish housing bands that would broadly result in a rate of change of no more than 20% for each settlement by the end of the plan period. Most settlements fall well below a 10% rate of change. A handful of villages within West Devon have been identified as being able to support a rate of change between 10-20% over the plan period.
- 8.45 At some point a minimum threshold has to be identified to ensure that settlements that cannot offer any supporting facilities or amenities for new residents are not actively promoted as locations for new housing. Following some scenario testing, which looked at a number of different scoring combinations, a score of 15 was identified as being a realistic threshold to justify identifying a village as sustainable. It was considered that a settlement would need to have at least one of the higher weight criteria, and/or a number of middle weight criteria to be able to meet the minimum score of 15. Settlements with a handful of mid-weight or low weight facilities were unlikely to meet the threshold. Examples of settlements across the TTV policy area that could not meet the threshold displayed a commonality of having very limited physical facilities and/or were distant from the 'A' road network, had poor mobile and broadband service and were not well connected to higher level settlements that could offer a good range of services and facilities.
- 8.46 Whilst the settlement assessment has been conducted on a desktop basis, it has been subject to one 'policy on' scenario, in order to

minimise impact and harm to the AONB. Despite a number of villages within, or on the boundary, of both the South Devon and Tamar Valley AONBs obtaining a moderate or high assessment score, all settlements that have an impact on the AONB, or the setting of the AONB, have been given a notional housing figure of 10 dwellings. This is to enable a neighbourhood plan to avoid promoting the notion of 'major' development in accordance with the General Permitted Development Order, which uses a threshold of 10 units as a definition of 'major'. It is acknowledged that this is a slightly crude policy intervention, but if neighbourhood plans being prepared with AONBs would like to deliver more, or significantly more housing than the 10 identified, and they can do so without resulting in harm to the AONB, they will be supported by the LPA to do so. This also provides a basis for neighbourhood plans in the coastal areas of the South Hams in particular, to identify and allocate sites at a scale that meets local housing need rather than open market demand.

Question 8.4(ii)

Policy TTV31 sets out criteria for horse related developments. The Councils in SUB8 suggest that this should be a separate policy. Is this justified?

8.47 Yes. The original drafting of policy TTV31 included criteria specific to the delivery of horse-related development. This part of the policy was clearly distinct from other parts of the policy that relate to all development proposals, and as such is incongruous and poorly related. For clarity, and to aid both applicants and decision makers, separating the horse related policy from policy TTV31 is considered to be justified.

Question 8.4(iii)

Are the changes proposed by the Council to the policies necessary for reasons of soundness, particularly in relation to setting criteria for residential extensions in Policy TTV32?

8.48 Not for soundness, but for completeness. The Reg19 draft policy omitted to provide a sufficient level of clarity regarding what measures are to be expected of residential extensions. Without the changes proposed the policy did not give sufficient guidance to applicants or decision makers on what is required for proposals of this nature.

Question 8.4(iv)

Are any other amendments required to make the policies sound?

8.49 No changes are proposed for reasons of soundness.

8.50 Minor modifications are, however, proposed for the purposes of clarification. These can be seen in EXC10A, references M198 to M212.

Issue 8.5: Housing delivery in the TTVPA (Housing site allocations [Policies TTV5-6, TTV8-11, TTV13-15, TTV18, TTV21-22, TTV24 and TTV26-29], housing trajectory and Policy DEV8)

Question 8.5(i)

i. In relation to housing site allocations proposed for development within the TTVPA:

a. Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?

8.51 The approach to establishing the scale of housing in each allocation has had regard to constraints and provision of necessary infrastructure and is therefore justified and consistent with paragraph 017 Reference ID:3-017-20140406 of NPPG Housing and Economic Land Availability Assessment.

8.52 For the TTV allocations site potential is estimated through Officer consideration of the constraints and opportunities (including designations and infrastructure) identified in the respective site SHLAA entries (see H04A to H04G and Appendix 1 of this Hearing Statement). The methodology is described at page 9 of the Strategic Housing Land Availability Assessment Final Report, March 2017 H04).

8.53 A number of allocations have had bespoke masterplanning / in house work to assess capacity potential. In these cases the capacity used comes from masterplanning work rather than the SHLAA's methodology to establish capacity potential. The SHLAA's approach to net developable area and density was ratified by the SHLAA panel and no alternative approaches or size trigger assumptions were offered.

8.54 In addition a significant number of proposed allocations already benefit from planning permission. For these sites is it considered that the Development Management process has thoroughly tested the approach to each site in terms of the quantum of housing as well as infrastructure / other related needs and deliverability.

8.55 Appendix 1 to this Matter Statement summarises the consideration of the scale of housing.

b. Is the housing trajectory (TP3C) realistic for each allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?

8.56 The forecasts and assumptions for each allocation are realistic and have been based on evidence of past lead in times and delivery rates that have been achieved in SH / WD as well as delivery programme intelligence from developers / land promoters. TP3H sets out the forecast for each allocation, whether the forecast has been agreed with the main developer / landowner and what assumptions have been used regarding lead in times / delivery rates in the absence of agreement. Where forecasts have not been agreed TP3H also sets out alternative forecasts put forward by developers / landowners.

8.57 In a number of cases developer's / landowner's have indicated that the JLP Councils' forecasts are pessimistic and the allocation could come forward earlier or alternative amounts have been suggested. Where this is the case (TP3H) identifies in the forecast assumptions column that the site has the potential to

come forward earlier and/or deliver at a higher rate than that assumed in the trajectory and sets out the reasons why the JLP Councils have been more cautious in the approach to expected delivery timeframe. This column also indicates where alternative quantum's have been put forward. Other than the sites referred to above, there is no evidence to suggest that allocations might not be delivered in accordance with the trajectory.

c. Are the specific development requirements of each site allocation policy effective and justified by evidence?

8.58 The JLP Councils consider that the specific requirements of the policies are effective and justified by evidence.

8.59 Appendix 1 sets out the primary evidence base sources that have been used to help identify development requirements. It should be noted that our intended approach has been to only add points / criteria to site allocation policies where we feel it is helpful to identify something specific which may already be covered generically in a DEV policy.

8.60 A significant number of proposed allocations already benefit from planning permission. For these sites is it considered that the Development Management process has thoroughly tested the approach to each site in terms of the quantum of housing as well as infrastructure / other related needs and deliverability.

d. Will the allocations achieve sustainable development?

8.61 The allocations set out in the plan will achieve sustainable development.

8.62 The allocations are consistent in principle with the plan's spatial strategy which sets a framework for sustainable development and a sustainable distribution strategy (the SPT policies).

8.63 Additionally, many of the allocations include detailed provisions designed to ensure that the detailed scheme actually implemented accords with sustainable development principles and will be considered in the context of the other development (DEV) policies of the plan which will help address site specific sustainability issues.

8.64 The sustainability appraisal of sites is found at SUB9H with site selection is summarised in EXC3D.

Question 8.5(ii)

Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the TTVPA will be maintained and will deliver the requirement of Policy SPT3?

8.65 Yes, the end March 2017 housing trajectory for the Thriving Towns and Villages Policy Area (TP3G) is a robust forecast of the delivery of housing supply over the plan period. The Councils consider there is sufficient flexibility in that forecast to maintain supply in TTV policy area and deliver the requirement for TTVPA set out in SPT3 for the following reasons.

8.66 Delivering the requirement

- The TP3G evidence provides the latest forecast of housing supply from completions in the plan period. 9,371dws are forecast to be built in TTVPA in the plan period. This is sufficient to deliver the

TTVPA requirement of at least 7,700. Supply is forecast to reach this minimum target in 2027/8. By the end of the plan period supply is forecast to exceed the minimum target by about 1,300 dwellings. At 21% this is a robust level of 'headroom' and a strong indication of sufficient flexibility in the trajectory (see also the JLP Councils' response to Q3.3ii). So, if some sites do not deliver as forecast, there is sufficient supply already identified that could come forward and still deliver the minimum requirement. The level of headroom available also provides responsiveness to changing circumstances.

- The JLP Councils consider that the forecast of delivery of supply in total and the constituent supply categories is robust. This underpins the conclusions about the flexibility of the TTVPA trajectory. See the JLP Councils' responses to:
 - Q3.3viii March 2017 monitoring point trajectories
 - Q3.3iii Commitments; completions; Small non-garden land windfalls
 - Q3.3iii Sustainable Villages (Neighbourhood Plans) Allowance
 - Q3.iv lapsed rates
 - Q8.5.i TTVPA Site Allocations - Individual sites' supply

8.67 Maintaining supply

- **Supply over the plan period.** The TP3G evidence demonstrates that supply can be maintained over the plan period. Graphs TTV2 (2a) and (2b) illustrate the 'Plan Monitor Manage' analysis of supply. They are based on the evidence of the combined completions totals across the policy area forecast for each year over the plan period. That evidence is set out in Table TTV2 (TP3G). The three analyses in this table provide demonstrate that supply is maintained. The graphs illustrate the trajectory and those analyses, whereby maintaining supply means that:

- a. **Plan** The forecast supply in TTVPA (illustrated by the purple bars in graph TTV2a) is above the annualised target of 385 pa (the green Plan line) in every year from 2015/16 until 2027/8. At 2027/28 the minimum target is met. Delivery continues after that point, albeit at a lower rate. This provides a high level of flexibility. Even if supply is not delivered as quickly as forecast, with a 21% 'headroom' there are still reasonable prospects that the target will be achieved by the end of the plan period, or earlier from the supply sources identified at the 2017 Monitoring Point.
- b. **Plan** The forecast future supply in TTVPA illustrated by the purple bars in Graph TTV2a also shows that supply is 'front loaded'. That is, after the March 2017 Monitoring Point, there is a higher annual supply earlier in plan period notably in 2020/21 and 2021/22, compared to supply towards the end of the plan period. This is consistent with the NPPF objective to significantly to boost supply. Early delivery is supported by robust evidence in TP3I, which has been informed by evidence provided by developers about their intentions to submit planning applications in 2018 and for swift site starts. Front-loading is another indicator of flexibility. Early delivery reduces the risk of not achieving the target by 2034. The TTVPA does not depend on a high percentage of supply delivery much later in the plan period.
- c. **Monitor** A surplus supply position is forecast over the whole plan period in the TTVPA. There are no years since 2014 when cumulative supply was or is forecast to be less than the cumulative target. This is evidenced in Table TTV2, which shows the forecast cumulative completions, and the cumulative target at each year. The forecast of delivery for

each year, illustrated by the red Monitor line in Graph TTV2b, is therefore above the X axis for all years after 2014/15. This also means there is no shortfall (backlog) at any time that would need to be met in future years. This is additional evidence that forecast supply can be maintained and the requirement delivered.

- d. **Manage** Graph TTV2a, based on Table TTV2, provides evidence that at this time supply does not need to be brought forward from later in the plan period in the TTVPA. The orange Manage line is not a 'hockey stick' shape. In fact, it is quite the opposite. This means that at the end of the plan period the Manage line is below the X axis and curves steeply downwards. This occurs because the requirement is forecast to be met from supply delivered earlier in the plan period, and requirement is met before the end of the plan period. It is proof that supply is not back loaded. It is also evidence that there is sufficient flexibility if in future supply needs to be brought forward, were delivery of some sites not to occur when forecast.

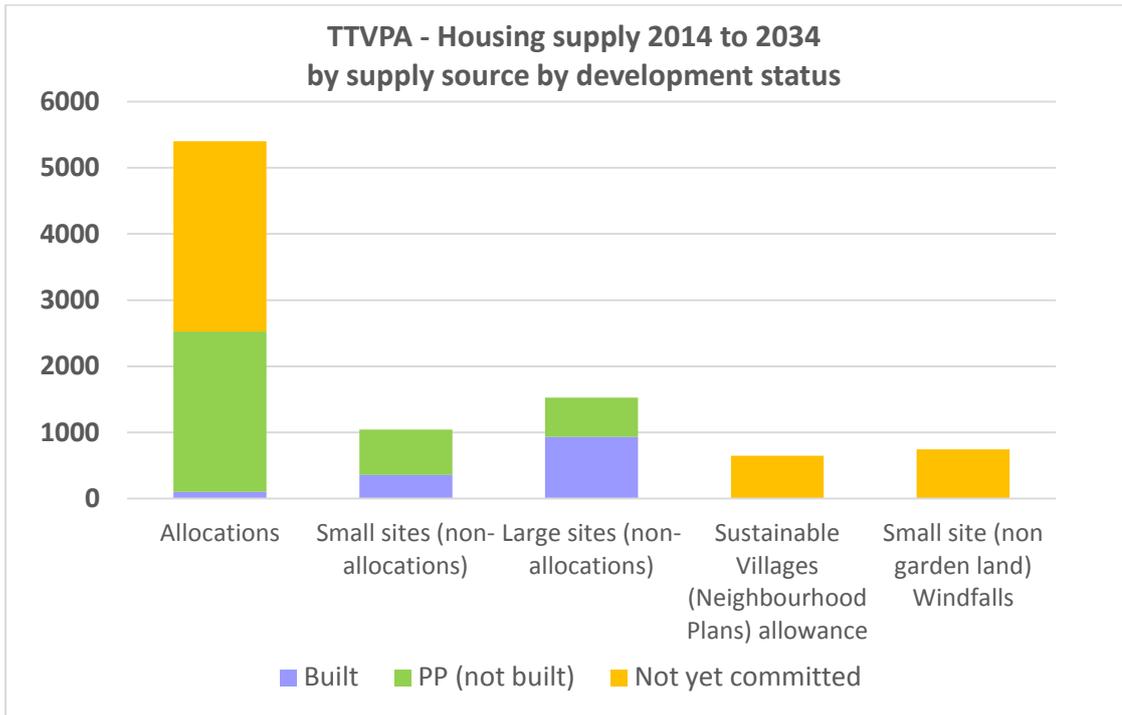
8.68 The plan set out the approach to managing housing land supply.

- JLP Paragraph 3.32 outlines the Housing Implementation Strategy whereby the LPAs will undertake proactive actions to assist developers to bring sites forward as effectively and efficiently as possible, from the supply sources already identified in the trajectory. This approach enhances the flexibility of supply. The Housing Implementation Strategy for the full range of housing describes how the JLP Councils will maintain delivery of a five-year supply of housing land to

meet their housing target (NPPF para 47 4th Bullet Point). The Topic Paper on Governance and Implementation, January 2018 identifies the mechanisms for collaborative working by the JLP Councils to undertake the proactive actions in that Strategy.

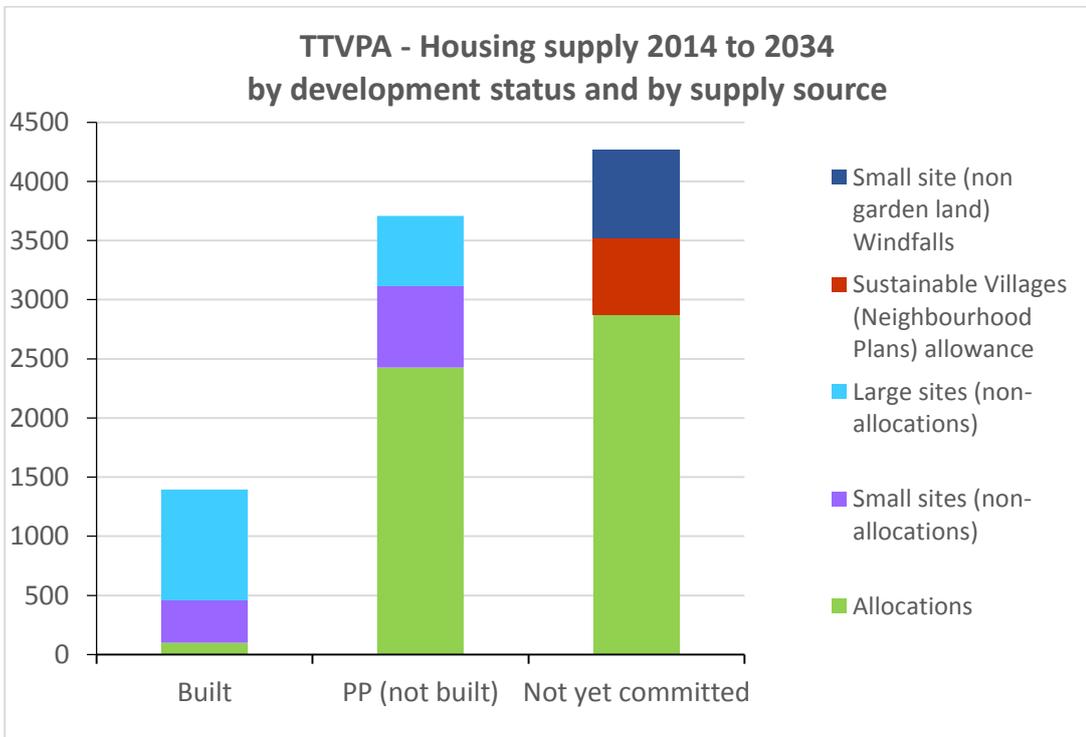
- Ample site allocation provision is made within TTV Policy Area by the site allocation policies in the JLP. This provision of about 5,400 dwellings with range of sites (locations and size) consistent with the JLP spatial strategy, and to provide greater certainty of policy intention. This supply category is equivalent to 70% of target; and to 57% of supply. This overall level allocation is a major reason why forecast overall supply is sufficient. It is an effective way to manage risk. In the event that some sites don't come forward there is sufficient provision identified. The Councils consider their forecasts to be robust but acknowledge that it is not possible to guarantee that a site will definitely be delivered.
- The mix of sites in the TTVPA in terms of the range of supply sources also contributes to the flexibility of the trajectory Supply in TTVPA coming from the range of supply categories. Figure 2A AND 2B (below / over the page) demonstrate that supply over time is not dependent on a single supply category. This mix in itself contributes to the inherent flexibility of the trajectory.

Figure 2a Housing supply by supply source and development status



Source TP3G – Table 3

Figure 2b Housing supply by development status and by supply source



Source TP3G – Table 3

- The JLP does not allocate contingent reserve sites to be brought forward, or trigger mechanisms to release such sites for development. The plan already allocates sufficient sites to provide 'headroom' at an appropriate level of confidence and degree of flexibility in the supply figures. It is not necessary to make further provision.
- There is no phasing policy in JLP to restrict timing of development sites coming forward. So if a site is not delivered when predicted in the trajectory, other sites currently shown later in the forecast could be brought forward to meet need. These could include sites that were forecast for delivery later in the plan period in order for the combined trajectory at a settlement to be realistic (TP3I).
- The JLP provides the policy context for the Councils to determine windfall development proposals. The trajectory includes a forecast of delivery from small, non-garden land windfalls which adds to flexibility. The TTVPA trajectory doesn't include a forecast of future large windfall developments permitted after March 2017 because the JLP makes sufficient provision and, therefore, it is not necessary to include this supply category at this time. Nevertheless, such sites continue to come forward and it is reasonable to expect them to add to supply in the plan period. They will add to the forecast supply in TTVPA. For example, planning application 2821/17/FUL for the conversion of Fort Bovisand, including 81 dwellings, was approved with conditions by South Hams DC Development Management Committee on 29 November 2017. Such sites add to supply and to the level of flexibility already provided by the trajectory. Some of these may be sites that were assessed for SHLAA purposes as sites with constraints or unviable, where those matters might be overcome in the future or, which have been

unavailable, but which may come forward through future SHLAA updates and become available. The emerging brownfield register may be another tool to bring forward consents on qualifying sites between plan reviews.

- The mechanism for managing supply from the Sustainable Villages (Neighbourhood Plan) supply category is set out in paragraph 5.157. RTP3 paragraph 7.72 to 7.80 explains why this provides flexibility and is an appropriate way to manage supply.
- JLP Paragraph 1.22 commits the Councils to a full review of key parts of the plan such as the development strategy to be undertaken at least once every five years. Plan-making is the appropriate process for introducing changes to supply as part of the development plan. This is part of the management mechanism that enables delivery of housing supply to meet housing need,
 - **Maintaining supply does not mean** that the whole requirement must be delivered early in the plan period (although our the trajectories provide evidence demonstrating that delivery rates in TTVPA are forecast to rise from now to a peak in 2020/21 and 2021/22 and demonstrates that the plan is boosting supply). Nor does it mean that the annualised figure must be delivered each year. Any supply surplus compared to cumulative targets can be taken into account when considering the 5 year housing land supply for the next 5 years.
 - **Demonstrating a 5 year housing land supply is a policy approach** in NPPF paragraphs 47 and 49 for maintaining housing supply. Graph TTV3 illustrates the 'Rolling 5 year housing land supply' analysis for the TTVPA (TP3G). This is based on Table TTV3 (TP3G) and shows the 5 YLS position at every year in the trajectory. For each year over the plan

period it compares forecast housing delivery against the forecast targets for the next 5 years derived from Policy SPT3, and is based on the 2017 Monitoring point evidence from Table TTV2.

8.69 This evidence demonstrates that the JLP results in a robust supply position in the TTVPA, with a continuous supply being maintained over the plan period. That is, both at the point of adoption, and into the future. The graph shows that there is more than 5 years land supply in this Policy Area for all forecast years from 2014/15 to the point when the minimum target is achieved in 2027/28. The point of adoption is likely to be between the 2018 and 2019 monitoring points, where the trajectory forecasts a supply in TTVPA of 8.2 and 8.5 years respectively based on a 20% buffer. Supply would be 9.3 and 9.9 years respectively with a 5% buffer. This is a very healthy supply position. It is also a sign of considerable flexibility this early in the plan period. (See also JLP Councils' response to questions Q8.5iii and Q3.3v about 5 year housing land supply) The Councils response to Q3.3vii considers whether a 20% buffer is necessary at this time.

8.70 The evidence in TP3I demonstrates there is no backlog of supply delivery in TTVPA at any time after the 2017 monitoring point. The Councils response to Q3.3vii explains why in this situation it is not necessary to consider whether to apply a 'Sedgefield' or 'Liverpool' approach to resolving a backlog.

Question 8.5(iii)

Will the housing provision made within the TTVPA have a reasonable prospect of delivering its share of the five year housing land supply at the point of adoption of the JLP?

8.71 Yes, based on the SPT3 housing provision requirement for at least 7,700 new homes in the plan period, the evidence in the housing trajectory for the TTVPA (TP3G) demonstrates that there is a reasonable prospect¹ of a 5 year housing land supply in the TTV Policy area at the point of adoption. The JLP Councils' response to Q3.2 sets out why SPT3 expresses provision in terms of Policy Areas and why the correct provision for JLP policy for the TTV Policy Area is at least 7,700 dwellings. In accordance with NPPF paragraph 47-4th bullet point, the housing implementation strategy for the full range of housing outlined by paragraphs 3.32 and 3.33 in the Submission JLP describes how the JLP Councils will maintain delivery of a five-year supply of housing land to meet their housing target.

8.72 Demonstrating a 5 year housing land supply is important because of NPPF paragraphs 47 and 49 policy towards maintaining housing supply. If the LPA cannot demonstrate a 5 year supply of deliverable sites then relevant policies for the supply of housing should not be considered up to date. If a development plan is out of date, then for decision taking this triggers the 'tilted balance' in NPPF paragraph 14.

8.73 Demonstrating a 5 year housing land supply at the point of plan adoption is necessary. It provides the evidence that the development plan would not be out of date at point of adoption of the JLP. Submission JLP Figure 3.5 states the five year land supply statistics for the whole plan area and for the two Policy Areas. These are based on a 20% buffer and an assumed point of plan

¹ The concept of reasonable prospect is considered in RTP3 paragraphs A6.17 to A6.19

adoption at March 2018. They show a forecast supply in TTVPA equivalent to 7.3 years, based on the evidence in the 2016 monitoring point TTVPA trajectory (TP3C and TP3Ci).

8.74 Mindful of the ongoing JLP Examination, the JLP Councils now expect the point of adoption of the JLP to be between 2 monitoring points. That is, end March 2018 and end March 2019. TP3Ci shows a forecast supply in TTVPA equivalent to 7.4 years as at end March 2019.

8.75 NPPF requires the Councils to identify and update annually a supply of specific deliverable² sites sufficient to provide five year's worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The 5 years are from the monitoring point when there is a complete set of supply data. The latest monitoring point for the TTVPA housing trajectory is end March 2017 (TP3G), so the forecast 5 year period (years 1 to 5) would be April 2017 to end March 2022. Analysis of the 5 year supply at point of adoption is partly beyond that timeframe. In effect, the forecast supply at adoption at April 2018 would be years 2 to 6 and at April 2019 would be years 3 to 7 from the latest monitoring point supply evidence. The JLP Councils consider that the supply identified in years 1 to 5 in the latest trajectory meet the criteria in NPPF footnote 11. They consider that the supply identified in years 6 to 7 in the latest trajectory also meet the criteria in NPPF

² NPPF footnote 11 To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans

footnote 11, which exceeds the requirement of NPPF paragraph 47 3rd bullet point and footnote 12³ where the test in those years is for sites to be 'developable'.

8.76 The results in Submission JLP Fig 3.5 have now been superseded by the evidence in the end March 2017 monitoring point TTVPA housing trajectory (TP3G). This is the latest up to date available evidence. The calculations and the results for the end March 2018 and end March 2019 monitoring points are shown in Table TTV6 and Graph TTV3. This demonstrates that the housing land supply position is well above 5 years, and is forecast to be as follows:

- a) 8.2 years at end March 2018 and 8.5 years at end March 2019, based on a 20% buffer
- b) 9.7 years at end March 2018 and 9.9 years at end March 2019, based on a 5% buffer.

8.77 The reasons why there is a reasonable prospect of a 5 YLS by at the point of adoption are as follows:

- a) The latest trajectory evidence is up to date and robust. This includes the evidence in the individual large site trajectories (for the latter see the Councils responses to Q3.3, Q7.6i and Q8.5i, including the level of agreement with the developers regarding the large site trajectories). The large sites in the trajectory have been assessed individually, and all large sites with dwelling completions forecast for Years 1 to 5, and Years 6 and 7 from the March 2017 Monitoring Point:
 - are available now or with regard to sites identified to commence delivery in years 6 and 7 have a reasonable prospect of being available
 - offer a suitable⁴ location for development now; and

³ NPPF footnote 12 To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged

⁴ For the purposes of assessing the 5year housing land supply at point of adoption, the trajectories assume that JLP policies with site allocations that are forecast to deliver housing in years 1 to 7 that do not have planning permission as at the 2017 monitoring point will be found sound, included in the adopted JLP, and can therefore be counted as part of supply.

- are achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission that have not expired as at the 2017 monitoring point are included as deliverable. Where there is clear evidence that schemes will not be implemented within five years, or later, these have been excluded.
- b) The method for calculating the 5 year housing land supply is correct. The calculations and results for 2018 and 2019 are set out in the updated Housing Topic Paper (RTP3.X paragraphs 8.18 to 8.33). The JLP Councils conclude that
- The correct calculation is made of the forecast requirement for the next 5 years, including the appropriate buffer. This is :
 - The annualised 385 TTVPA target (as a minimum) multiplied by 5 years (ie 1,925)
 - Where there is a shortfall of cumulative completions compared to cumulative target since the start of the plan period to the monitoring point, all the backlog is then added to the 1,925, to give a 5 year requirement before a buffer is added. Where there is a surplus, this is taken into account on a residual basis, as explained in RTP3X A6 paragraph A6.42, to give a 5 year requirement before a buffer is added.
 - The buffer is then applied to the 5 year requirement. This gives the target for the next 5 years to use in the 5 year housing land supply position calculations.
 - From the 2016 monitoring point trajectory (TP3C/Ci)
 - at end March 2018 this was 1,883 (ie 1,925 minus the 42 which is the residual surplus for the 5 years). Adding the 20% buffer results in **2,260** dwellings. Annualised, this equates to **452 dpa**
 - at end March 2019 this was 1,821 (ie 1,925 minus the 104 which is the residual surplus for the 5 years) Adding the 20% buffer results in **2,185** dwellings. Annualised, this equates to **437 dpa**
 - In the updated 2017 monitoring point JLP housing trajectory (TP3E), again no shortfall is forecast at these two monitoring points and the respective forecasts at March 2018 and March 2019 are 1,812 (ie 1,925 minus 113) and 1,777 (ie 1,925 -

148) respectively. Adding the 20% buffer results in **2,174** and **2132** dwellings, and annualised, this equates to **435** and **426 dpa** respectively

- The correct calculation is made of the forecast supply for the next 5 years. This is the sum of the forecast net completions for each of the next 5 years from the relevant monitoring point .At end March 2018 this was 9,815 and at end March 2019 this was 9,702 dwellings for the JLP area (TP3C/Ci). In the updated JLP housing trajectory (TP3E) the respective forecasts are 3,546 and 3,619 dwellings.
- The correct way to estimate the 5 year housing land supply position in the JLP plan area is as follows:

Point of Adoption	2016 Monitoring Point Trajectory (TP3A)	2017 Monitoring Point Trajectory (TP3E)
End March 2018		
Forecast supply for the next 5 years (A)	3,307	3,546
Annualised requirement for the next 5 years (B)	452	435
Years equivalent (A/B)	7.3	8.2
End March 2019		
Forecast supply for the next 5 years (C)	3228	3619
Annualised requirement for the next 5 years (D)	437	426
Years equivalent (C/D)	7.4	8.5

(Note: numbers have been rounded)

8.78 The 2016 monitoring point forecast supply of 3,307 and 3,208 at the two monitoring points is lower than the latest forecast for those years in TP3G (3,536 and 3,619 respectively). The main reason for this is that the 2016 monitoring point data relied on very cautious assumptions about lead in times and delivery rates. Those assumptions were appropriate at that time. Production of the 2017 Monitoring Point trajectories, as requested by the Inspectors in EXC2, provided a timely opportunity to update the forecasts so that they benefit from the latest evidence about delivery and

commitments, and from the consultation with the developers. The steps undertaken by the South Hams and West Devon LPAs to forecast delivery are set out in the JLP Councils' response to Q3.3.

8.79 Consequently, the Councils can rely on robust new evidence about lead in times, the likely date of the first completions on sites, and delivery rates. This evidence supports a higher number of dwellings forecast delivered to be delivered in the 5 year periods April 2018 to March 2023 and April 2019 to March 2024.

Question 8.5(iv)

Does Policy DEV8 adequately address the needs of different groups in the TTVPA in accordance with the first two bullet points in paragraph 50 of the Framework?

8.80 Yes, DEV 7, 8, 9 & 10 collectively state that a range of house types, size and tenure will be delivered. These will meet the various tenures and types. In particular DEV8 states that different housing types will be provided where there is an imbalance within a particular area. This will ensure that a good mix and choice will be provided to meet all needs.

8.81 Forms of evidence to support this are provided in the Levvel documents (H13, 13A, HO17), SHMA (HO17), Devon Home Choice register and evidence collected through neighbourhood plans. Neighbourhood plans are likely to have a robust housing needs survey which are provided as part of the planning process and ratification of a neighbourhood plan.

8.82 The demand in the TTV areas is for smaller one and two bed units to meet newly emerging households, and also those wishing to

downsize from properties too large for their needs is detailed in the documents mentioned above.

- 8.83 Further detail on the types of tenure will be detailed in the SPD. New models of affordable housing provision are coming on stream all of the time and therefore this document will not be restrictive.

Question 8.5(v)

Are the levels of affordable housing proposed in DEV8 supported by the evidence or would a higher figure be justified? In particular:

a. Point 2 refers to the provision of 30% affordable housing, whilst point 3 refers to the provision of a 'minimum' of 30%. Is the difference in wording justified? Does the policy seek to deliver a higher % of affordable homes (above 30%) within Main Towns and if so how will this be achieved?

- 8.84 To provide consistency and clarity minor modifications are proposed to the wording of policy DEV8 such that it aligns with the use of the word 'at least' in DEV7 (see M236, M237 and M238).

- 8.85 The figure is justified as there are some areas within the TTV, namely those mentioned in point c, that could provide a higher figure due to the market values, whereas elsewhere land could be more difficult to develop due to abnormal costs. The council seeks to ensure that in high value areas more than 30%AH can be achieved. The low level of delivery in these areas, house prices and shortage of suitable and available land justifies this.

- 8.86 Evidence is provided by the Colliers reports: South Hams and West Devon Strategic Housing Land Availability Assessment Viability Report H03 and Threshold Land Values report to inform the

Strategic Development Viability Assessment for both South Hams and West Devon H09.

b. Point 2 sets a requirement for affordable housing on schemes delivering 6-10 dwellings within rural areas and areas of special designations. Point 4 requires proposals in 'High Value Areas' for large single dwellings with a gross floorspace exceeding 200sqm in schemes of less than 6 dwellings, to provide off-site commuted sums to deliver affordable housing. Are these requirements consistent with the Written Ministerial Statement of 28 November 2014 and the Planning Practice Guidance affordable housing thresholds (PPG Paragraph: 031)

8.87 The Council has limited evidence to support the 200msq of floorspace, but the figure responds to the high number of planning applications for large properties on redeveloped housing sites in the high value areas. We currently look to the ministerial statement for guidance in terms of a site where units exceed 10000sqm of floor space. A commuted sum is applied in this instance and the formula will be set out in the SPD.

8.88 The Council would additionally seek to apply a commuted sum for 6-10 units regardless of the size, not just on single dwellings.

c. 'High Value Areas' consist of specific postcode areas in South Hams. Are these areas clearly identified within the plan (or on the policies map) and are they justified? How has the floorspace threshold and number of units been determined?

8.89 The areas are not identified in the plan. This would be achieved through inclusion in the TTV SPD. The basis for High Value Areas is established in HO9. The map on page 28 of that document identifies value areas by post code. It is considered that Value Band 3 and Value Band 4 are High Value Areas.

8.90 The above comments on floorspace are also relevant here.

d. Is it clear that the affordable housing requirements are subject to viability and Policy DEL1?

8.91 Whilst the plan does not overtly refer to viability and it is considered that recognition of the provisions of paragraph 173 of the NPPF is well established within the industry, a reference to viability is proposed in policy DEV8 (see M236, M237 and M238).

8.92 With respect to DEL1 it is considered that the JLP should be read as a whole document and all relevant policies will be used to determine planning decisions. The role of Del1 is flagged at paragraph 7.21 of the plan and it is noted that further clarification will be provided in the TTV SPD.

e. Is it clear how and where affordable homes will be delivered and what mechanism will be used to determine the commuted sum levels?

8.93 It is considered that DEV8 provides some clarity, but further detail would be necessary in the SPD.

Question 8.5(vi)

Would a restriction on the use of new dwellings as holiday homes be justified in South Hams?

8.94 The number of homes not used as primary residence is particularly high in the South Hams part of the TTV. Both South Hams and West Devon received a substantial sum of money to deliver more affordable homes through the Community Housing Fund in recognition of this. Evidence also exists of in HO3, HO9, TP3, SHMA and CTB1 (council tax reports) and the Strategic Housing Market Assessment Part 1: The Housing Market Area and Updating the Objectively Assessed Need (HO13).

8.95 At this time it is considered that the appropriate mechanism to bring such a policy forward is a Neighbourhood Plans. It is through NO that the above District / Borough wide evidence can be reviewed, analysed and supplemented with a view to informing the need, justification and effectiveness of a restrictive policy.

8.96 To this end the Council (South Hams) resolution of 15 December 2016 stated that 'this Council

notes the ruling of the High Court (Case No: CO/2241/2016) in support of a housing policy known as 'H2. Full Time Principal Residence Requirement' as set out in St Ives Area Neighbourhood Development Plan and which provides that: '*New second homes and holiday lets will not be permitted at any time ...*' and 'supports Town and Parish Councils within the South Hams District to adopt similar policies in their own Neighbourhood Development Plan'

APPENDIX 1 – Response to Question 8.2iii (c and d) and 8.5i (a and c)

Table 1 Question 8.2iii (c and d) for employment sites

Policy Site Allocation	Is the type and amount of development proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?	Is the development deliverable in the timescales envisaged?
TTV17 Exeter Road, Okehampton Employment	The proposed allocation and requirements respond to demand for employment land in the TTV and at Okehampton, as well as the need to maintain and improve the self-containment of the Town. Specific criteria address matters raised in the SHLAA (HO4G page 49 and page 56, reference WD_23/17/13), the Integrated Assessment (pages 11 and 12 SUB9H) and the Landscape Impact Assessment (EN32 page 24). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. The Okehampton Masterplan SPD and the process of dealing with planning applications and subsequent development of part of the site have also informed the specific criteria.	This proposed allocation carries forward, from the current development plan (Okehampton Masterplan SPD), 11.2ha of land for employment. The landowner submitted the site through the SHLAA process (HO4G page 49 and page 56, reference WD_23/17/13) and advises that demand exists for the quantum of development.
TTV19 Stockley, Okehampton Employment	The proposed allocation and requirements respond to demand for employment land in the TTV and at Okehampton, as well as the need to maintain and improve the self-containment of the Town. The five criteria address matters raised in the SHLAA (HO4G pages 53 and page 56, reference WD_23/19/13), the Integrated Assessment (pages 11 and 12 SUB9H) and the Landscape Impact Assessment (EN32 page 28). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. The Okehampton Masterplan SPD has also informed the specific criteria.	This proposed allocation carries forward, from the existing development plan, 10.67ha of land for employment (Okehampton Masterplan SPD). This site is particularly important as it provides sufficient flat land to accommodate large buildings for B8 uses and has good access to the A30. The landowner submitted the site through the SHLAA process (HO4G pages 53 and page 56, reference WD_23/19/13) and advises that demand exists for the quantum of development.
TTV23 Pixon Lane, Tavistock Employment	This proposed allocation seeks to ensure that employment uses are retained in Tavistock. The area comprises flat land close to a main distributor road that can accommodate employment uses, which are essential to balance the sustainability credentials of Tavistock.	n/a
TTV28.4 Riverside, Totnes Employment	This proposed allocation carries forward a commitment in the planning permission to deliver employment development on the site. Initially a mixed-use site, planning permission was granted for the residential element and this has been built.	Development has commenced
TTV28.6 Ashburton Road, Totnes Employment	This proposed allocation carries forward a commitment in the planning permission to deliver employment development on the site. Initially a mixed-use site, planning permission was granted for the residential element and this has been built.	
TTV29.3 Beacon Park, Dartington Employment	B2 and B8 elements are considered to be suitable uses for the site given that it adjoins the main A385 road connecting it to the A38 trunk road, a relatively short distance away. There are no residential properties immediately adjoining the site. Existing employment activities on the site include a range of B1 offices, B2 workshops and also B8 storage and distribution uses. The quantum of development is informed by a Workspace Demand Assessment that was undertaken to support a planning application (3631/17/OPA).	A decision on the planning application is imminent and the developer, in requesting a seven year permission has indicated that the development is likely to be delivered within that time frame. The Council accepts the owner's representation that seeks an amendment to the allocation, adding a small parcel of land adjoining the allocation to the north-west. Also, based on the submitted planning

		application, the allocation of 11,300 sqm of new employment floorspace might be an over-estimation of what the site will actually deliver.
TTV29.8 Higher Tweed Mill, Dartington Employment	This proposed allocation carries forward a commitment in the planning permission to deliver employment development on the site. Initially a mixed-use site, planning permission was granted for the residential element and this has been built. A reserved matters application (2902/15/ARM) was approved on 3 May 2016 for: The erection of 30 dwellings and an employment building of approx. 558 sq.m. The employment building (2 storeys) has been designed to be as flexible as possible, with the potential to be sub-divided in to a range of smaller workspaces and studios.	Development has commenced.
TTV29.10 Woodlands Yard, Dartington Employment	Woodland's Yard is located a short distance to the north of Dartington village, just to the south of the housing cluster at Huxham's Cross. The site, which extends to 1.37 ha, fronts onto the main A384 road, from which vehicular access is gained. A number of sheds, storage areas, workshops and small outbuildings currently exist on the site, with a low level of forestry and agricultural enterprises based there. Some of the buildings on site would benefit from repair and modernisation, whilst there is also scope to increase the amount of employment floorspace through the provision of additional small-scale employment and craft units.	The site was submitted to the 2008, 2013 and 2016 SHLAAs (SH_14_08/13/16). The landowner states that they 'support this allocation policy and wish to confirm availability and deliverability.' They also confirm that 'Having a defined allocation area will also assist with decision making related to any applications for modifications to existing buildings.' The site is promoted for additional employment development and is 'not constrained by technical issues, including access, landscape, or servicing and is considered viable.' The evidence indicates that the site is deliverable during the plan period. However, the quantum of development may be limited.
TTV29.14 Lifton Farm Shop Employment	Lifton has an important role to play in making provision for the housing and employment needs of the western part of West Devon. This proposed allocation carries forward from the existing development plan 3.651ha of land for employment. This site is particularly important as it provides sufficient flat land to accommodate large buildings for B8 uses and has good access to the A30. The site is of sufficient scale to be able to accommodate a range of uses including employment related to the tourism sector. The proximity of the site adjacent to the main tourism route to Cornwall supports this potential. The scale of the site would potentially enable a range of uses to be accommodated, offering flexibility and choice for investors and end-users. Light industrial B2 uses could be appropriate as the site has no residential properties adjoining it, and it has the accessibility credentials to be attractive to storage and distribution uses. There is scope on the site to accommodate complementary uses, such as craft workshops, which would be appropriate in such a rural area and has a large volume of potential customers passing along the A30.	The site was submitted to the 2013 SHLAA HO4F pages 84 and 88, reference WD_35_15_13) and the owners have subsequently confirmed its availability for employment to complement existing uses on adjacent land.
TTV29.15 West of Palm Cross, Modbury Mixed use	A full application (35/0059/15/F) for the proposed site was approved in 2015 for mixed use development on land for erection of B1 use building, 93 dwellings, roads, footways and strategic landscaping. Development has commenced. The provision of additional homes and employment help self-containment of Modbury. The approach of the plan is also informed by the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25).	The site occupies a sensitive edge-of-town location requiring appropriate, high quality design. The heritage assets nearest to the site. The requirements reflect this key point that was assessed through the Development Management process and are also informed by the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25).
TTV29.24	The provision of additional employment at one of the	The delivery of employment is a requirement

<p>North and east of Milizac Close, Yealmpton Employment</p>	<p>district's largest villages will help its self-containment. The site adjoins the main A379 road, giving good connectivity to the district's main road network and to Plymouth.</p> <p>This proposed allocation carries forward from the existing development plan 1.28ha of land for employment. Yealmpton is identified as a Small Town and Key Village in recognition of the role that it can play to enhance the self-sufficiency of the settlement.</p> <p>A hybrid planning application (62/2948/11/O) for the proposed employment site and adjoining land was approved on 12 September 2012 for mixed use development comprising a full application for 60 residential units, allotments, public open space and other associated works (phase 1); Outline application comprising 2,500 sqm employment development (Use Classes B1, B2 or B8) and a further phase of residential development (up to 45 units) (phase 2) with means of access to be approved at this stage. The residential units have been completed.</p>	<p>of a partly implemented planning permission. The site is not within the South Devon AONB, but is located just outside its inland boundary (the A379) such that it is an important strategic location to provide an opportunities.</p>
<p>TTV29.25 North of Riverford Farm Shop, Yealmpton Employment</p>	<p>The provision of additional employment at one of the district's largest villages will help its self-containment. The site adjoins the main A379 road, giving good connectivity to the district's main road network and to Plymouth.</p> <p>The two criteria address matters raised in the SHLAA (HO4D) and the Landscape Impact Assessment (EN32 page 86), through criteria 1 (as amended) and 2.</p>	<p>This proposed allocation carries forward, from the current development plan, 1.01ha of land for employment.</p> <p>Whilst there is a risk it may not come forward in the short term, site is not within the South Devon AONB, but is located just outside its inland boundary (the A379) such that it is an important strategic location to provide an opportunities.</p>

Table 2 Question 8.5i (a and c) residential and mixed use sites

<p>Policy Site Allocation</p>	<p>Is the scale of housing for each site justified having regard to any constraints and the provision of necessary infrastructure?</p>	<p>Are the specific development requirements of each site allocation policy effective and justified by evidence?</p>
<p>TTV5 Cotton, Dartmouth Residential led mixed use</p>	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4A pages 69, 70 and 72, references SH_51_05_13/16, SH_51_03/08/13/16, SH_51_07_13, SH_51_04_13/16 and SH_51_06_13/16) and the Integrated Assessment (pages 3 and 4 SUB9H). The process of dealing with two planning applications has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted for approximately half of the site, by area, and the remainder is a live planning application that has yet to be determined. The site measures 28.4 ha, but landscape sensitivity (Landscape Impact Assessment: N32, page 2) limits the extent of development and the density that can be achieved on parts of the site. The importance of delivering new employment and community services, to further self-containment of Dartmouth, further limits the scope for housing.</p>	<p>The eight criteria address matters raised in the SHLAA (HO4B pages 69, 70 and 72, references SH_51_05_13/16, SH_51_03/08/13/16, SH_51_07_13, SH_51_04_13/16 and SH_51_06_13/16), and Integrated Assessment (pages 3 and 4 SUB9H) and the Landscape Impact Assessment (EN32 page 2). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Specifically, as the site lies outside the historic core and centre of Dartmouth it is essential that local services and facilities are enhanced (criteria 1, 2, 3 and 7). Criteria 4 and 5 specifically seek to address the sensitivity of the site in the landscape, particularly the area to the south east of the proposed allocation. Criterion 6 is considered to be necessary in the interests of quality design at this location that is a gateway to Dartmouth. An eighth criterion has been added to specifically require consideration of the impact of lighting to address landscape sensitivity and in the interests of amenity.</p>
<p>TTV6 Noss-on-Dart, (Dartmouth)</p>	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4A</p>	<p>pages 74 and 77, reference SH_30_05_16, the Integrated Assessment (pages 3 and</p>

Commercial led mixed use	pages 74 and 77, reference SH_30_05_16) and the Integrated Assessment (pages 3 and 4 SUB9H). Landscape sensitivity (Landscape Impact Assessment: N32, page 5) precludes a higher density of housing. The process of dealing with a planning application for the whole site has thoroughly tested infrastructure needs and deliverability. A decision on the planning application is anticipated at Development Management Committee on 7th February 2018.	4 SUB9H). The Landscape Impact Assessment (EN32 page 5), through criterion 6; Heritage Impact Assessment (HE4 page 111), through criterion 7 (as amended); and the Flood Risk Sequential and Exceptions Test Report (F11 page 78), through criterion 10. It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Specifically, criteria 1, 3 and 4 seek to ensure measures to enhance accessibility. Criteria 1 and 2 seek to ensure the existing function of the site and services are retained and enhanced. Criterion 5 is necessary in the interests of highway safety. Criteria 8 and 9 and the additional criteria 11 and 12 are necessary in the interests of protection of the environment and biodiversity.
TTV8 East of Ivybridge Residential led mixed use	This proposed allocation carries forward an allocation from the current development plan. The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 50, 51 and 55, including reference SH_57_06_08/13 and SH_57_08_08/13 – the wider area that was allocated in the development does not have a SHLAA reference) and the Integrated Assessment (pages 5 and 6 SUB9H). The process of dealing with two planning applications has thoroughly tested infrastructure needs and deliverability. Planning permission has been granted for approximately two thirds, by area, of the site. In comparison to the adopted development plan the amount of housing has been increased and the amount of employment has been reduced. This change reflects market conditions and is driven by the objectives of the parties controlling the land. It is important for the sustainability credentials of Ivybridge that employment and service provision is retained in this allocation.	The nine criteria address matters raised in the SHLAA (HO4B pages 50, 51 and 55, including reference SH_57_06_08/13 and SH_57_08_08/13 – the wider area that was allocated in the development does not have a SHLAA reference), the Integrated Assessment (pages 5 and 6 SUB9H) and the Landscape Impact Assessment (EN32 page 8), through criteria 3 and 5 (as amended). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Specifically, criteria 1, 2, 4, 5 and 6 seek to ensure measures to enhance accessibility / services and to ensure the existing functions / uses are retained and enhanced. Criteria 8 and 9 and the additional criteria 11 and 12 are necessary in the interests of protection of the environment and biodiversity. Criterion 8 is necessary in recognition of the location within a Critical Drainage Area. Criterion 9, as amended, is necessary in the interests of highway congestion and air quality (also criterion 6 and 7) and responds to the Ivybridge Neighbourhood Plan, which was made in December 2017.
TTV9 Filham Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 51, 52 and 55, references SH_57_14_14/16 and SH_57_15_14/16) and the Integrated Assessment (pages 5 and 6 SUB9H). The site measures 7.02 ha with landscape sensitivity precluding a higher density of housing.	The six criteria address matters raised in the SHLAA (HO4B pages 51, 52 and 55, references SH_57_14_14/16 and SH_57_15_14/16) and the Integrated Assessment (pages 5 and 6 SUB9H) and the Landscape Impact Assessment (EN32 page 11), through criteria 1 and 4 (as amended). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Specifically, criteria 2 and 6 (added) seek to ensure measures to enhance accessibility and reduce congestion. Criterion 5 is necessary in recognition of the location within a Critical Drainage Area. Criterion 3 and 6, as added, are necessary in the interests of highway congestion and air quality (in recognition of the AQMA at Western Road) and respond to the Ivybridge Neighbourhood Plan, which was made in December 2017.
TTV10 Stibb Lane Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 45 and 55, reference SH_27_02_13/16) and the Integrated Assessment (pages 5 and 7 SUB9H). The process of dealing a planning application for	The five criteria address matters raised in the SHLAA (HO4B) and the Landscape Impact Assessment (EN32 page 12), through criteria 1 and 4 (as amended). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Specifically, criteria 2

	residential development to the south of the proposed allocation has thoroughly tested infrastructure needs and deliverability of development at this location. The party controlling the land would seek to continue to move seamlessly from that site to the proposed allocation as if it were one development project. The site measures 4.73 ha with landscape sensitivity indicating a lower than average density of housing.	seeks to ensure measures to enhance accessibility and reduce congestion. Criterion 5 is necessary in recognition of the location within a Critical Drainage Area. Criterion 3 is necessary in the interests of addressing any impact on air quality in recognition of the AQMA at Western Road.
TTV11.1 Stowford Mill, Ivybridge Mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the Integrated Assessment (pages 5 and 6 SUB9H). Heritage sensitivity and the need to balance residential and the provision of services / employment in the centre of Ivybridge precludes a higher density / greater quantum of housing. The process of dealing with a planning application for the whole site has thoroughly tested infrastructure needs and deliverability.	The four criteria address matters raised in the Integrated Assessment (pages 5 and 6 SUB9H) and the Heritage Impact Assessment (HE4 page 113), through criterion a (as amended). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Criteria c and d seek to ensure measures to enhance accessibility and in the interests of addressing any impact on air quality in recognition of the AQMA at Western Road. Criteria b flags the existence of contamination and the importance of remediating it. Two criteria have been added in response to consultation comments from the Environment Agency (see also Flood Risk Sequential and Exceptions Test Report (F11 page 81). These require assessment and management of the leat in the interests of flood risk management and biodiversity.
TTV11.2 Woodland Road Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 46 and 55, reference SH_27_03_08/13/16) and the Integrated Assessment (pages 5 and 7 SUB9H). The process of dealing a planning application for residential development has thoroughly tested infrastructure needs and deliverability of development at this location. Landscape sensitivity determined that a higher density of housing was not appropriate and the need for on site water run off attenuation limited the area of developable land. Development of the site has commenced.	The four criteria reflect the key issues arising in the process of dealing with the planning application, namely landscape sensitivity, water run off attenuation, highway safety / congestion and impacts on the Western Road AQMA.
TTV11.3 Cornwood Road Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 45 and 55, reference SH_27_01_08/13) and the Integrated Assessment (pages 5 and 7 SUB9H). The process of dealing a planning application for residential development has thoroughly tested infrastructure needs and deliverability of development at this location. Noise (proximity to A38) and biodiversity sensitivity determined that a higher density of housing was not appropriate. The need for on-site water run off attenuation limited the area of developable land.	The three criteria reflect the sensitivity of the site with respect to water run off attenuation (it is in a Critical Drainage Area), highway safety / congestion and impacts on the Western Road AQMA.
TTV11.4 Land at Dame Hannah Rogers School Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the Integrated Assessment (pages 5 and 7 SUB9H).The site measures 1.82 ha, but topography and the need to retain existing parking for the school limits the	The three criteria reflect the sensitivity of the site with respect to water run off attenuation (it is in a Critical Drainage Area), highway safety / congestion and impacts on the Western Road AQMA.

	developable area and, therefore, the number of dwellings.	
TTV13 The Quayside, Kingsbridge Mixed use	This proposed allocation carries forward an allocation from the current development plan. The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 64 and 67, reference SH_28_36_16) and the Integrated Assessment (pages 7 and 9 SUB9H). The whole site extends to 4.64 ha, but the developable area and nature of development determined by topography, flood risk and the need to retain parking precludes a higher number of dwellings.	The seven criteria address matters raised in the SHLAA (HO4B pages 64 and 67, reference SH_28_36_16) the Integrated Assessment (pages 7 and 9 SUB9H); the Landscape Impact Assessment (EN32 page 14) and Heritage Impact Assessment (HE4 page 116), both through criterion 1, 2 (as amended), 5 and additional criterion on trees; and the Flood Risk Sequential and Exceptions Test Report (F11 page 84), through criterion 4 (as amended). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Criterion 3 seeks to ensure retention of parking to service town centre functions. A criterion has been added to flag the existence of contamination and the importance of investigation and remediation
TTV14 West of Belle Hill Residential led mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 60 and 67, reference SH_28_07_08/13) and the Integrated Assessment (pages 7 and 10 SUB9H). Landscape sensitivity precludes a higher density of housing. The process of dealing with a planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted. The site measures 3.86 ha, but topography and landscape sensitivity limit the density that can be achieved.	The five criteria address matters raised in the SHLAA (HO4B pages 60 and 67, reference SH_28_07_08/13), the Integrated Assessment (pages 7 and 10 SUB9H) and the Landscape Impact Assessment (EN32 page 17), through 1, 2 (as amended), 4 and an additional criterion covering lighting - and in recognition of its location in the setting of the SD AONB. It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Criteria 3 responds to the importance of ensuring the site connects well to the town centre for pedestrians and cyclists.
TTV15.1 West Alvington Hill Residential led mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 62 and 67, reference SH_28_20_08/13) and the Integrated Assessment (pages 7 and 8 SUB9H). Landscape sensitivity precludes a higher density of housing. The process of dealing with a planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted. The site measures 3.3 ha, but topography and landscape sensitivity significantly limit the density that can be achieved. The importance of delivering new employment sites in Kingsbridge further limits the scope for housing.	The three criteria address matters raised in the SHLAA (HO4B pages 62 and 67, reference SH_28_20_08/13), the Integrated Assessment (pages 7 and 10 SUB9H) and the Landscape Impact Assessment (EN32 page 20), through a (as amended) and an additional criterion covering lighting - and in recognition of its location in the setting of the SD AONB. It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Criteria c responds to the importance of ensuring the site connects well to the town centre for pedestrians and cyclists. Criterion b is required in recognition of the topography.
TTV15.2 North West of Kingsbridge Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 62 and 67, reference SH_28_01_13) and the Integrated Assessment (pages 7 and 8 SUB9H). Landscape sensitivity precludes a higher density of housing. The process of dealing with a planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted. The site measures 3.5 ha, but topography and landscape sensitivity significantly limit the density that can be achieved. The importance of delivering new employment sites in Kingsbridge further limits the scope for housing.	The three criteria address matters raised in the SHLAA (HO4B pages 62 and 67, reference SH_28_01_13), the Integrated Assessment (pages 7 and 8 SUB9H) and the Landscape Impact Assessment (EN32 page 22), through a (as amended) and an additional criterion covering lighting - and in recognition of its location in the setting of the SD AONB. It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Criteria c responds to the importance of ensuring the site connects well to the town centre for pedestrians and cyclists. Criterion b is required in recognition of the topography.

<p>TTV18 East of Okehampton Residential</p>	<p>The process of dealing with two planning applications has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted for the whole site. The site measures 36.17 ha, but topography, landscape sensitivity, archaeology and management of water significantly limit the scope and density of development.</p>	<p>The eleven criteria address matters raised in the SHLAA (HO4G page 49 and page 56, reference WD_23/17/13), the Integrated Assessment (pages 11 and 12 SUB9H) and the ; the Landscape Impact Assessment (EN32 page 26), specifically through criteria 1 and 10 (both as amended). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation and carries forward key elements of the Okehampton SPD. Criteria 2 and 3 are necessary given the location within a Critical Drainage Area and adjacent to areas of flood risk. Criteria 4, 5, 6, 7, 8 and 9 respond to the importance of enhancing local access to services and facilities and ensuring the site connects well to the town centre for pedestrians and cyclists as well as public transport. Criteria 8 and 9 additionally respond to open space need and health objectives. Criterion 10 is necessary due to archaeological remains of importance. Criterion 11 is required to ensure air quality does not worsen in the town centre, where readings are close to a level where an AQMA could be designated.</p>
<p>TTV21 Callington Road Residential</p>	<p>The process of dealing with an outline planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted for the whole site. The site measures 37.84ha, but topography, landscape sensitivity, heritage and management of water significantly limit the scope and density of development.</p>	<p>The eleven criteria address matters raised in the SHLAA (HO4G pages 92 and 97, reference WD_45_71_13) and the Integrated Assessment (page 13 SUB9H). A twelfth criterion has been added to specifically require consideration of the impact of lighting (landscape sensitivity). Criteria 1, 2 and 9 carry forward the objective of re-instating a rail link, which is a key element of the sustainability balance for the proposed allocation and of the Tavistock Masterplan SPD. Criteria 4 and 5 (both as amended) and criteria 6 and 11 respond to the Landscape Impact Assessment (EN32 page 30); with criteria 5 and 6 also respond to the Heritage Impact Assessment (HE4 page 119). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation and carries forward key elements of the Tavistock SPD. Criteria 1, 2, 3, 7, 8 and 9 respond to the importance of enhancing local access to services and facilities and ensuring the site connects well to the town centre for pedestrians and cyclists as well as public transport. Criterion 10 is required to avoid and reduce impacts on an AQMA.</p>
<p>TTV22 Plymouth Road, Tavistock Commercial led mixed use</p>	<p>The process of dealing with an outline planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted for the whole site. The site measures 17.84ha, but topography, landscape sensitivity, heritage and management of water significantly limit the scope and density of development.</p>	<p>The six criteria address matters raised in the SHLAA (HO4G pages 93 and 97, reference WD_45_72_13) and the Integrated Assessment (pages 13 and 14 SUB9H). A seventh criterion has been added to specifically require consideration of the impact of lighting. Criterion 4 carries forward the objective of re-instating a rail link, which is a key element of the sustainability balance for the proposed allocation and of the Tavistock Masterplan SPD. Criteria 1, 2 and 7 (added) respond to the Landscape Impact Assessment (EN32 page 32). Criteria draw on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation and carries forward key elements of the Tavistock SPD. Criteria 3, 4, and 5 also respond to the importance of enhancing local access to services and facilities and ensuring the</p>

		site connects well to the town centre for pedestrians and cyclists as well as public transport. Criterion 6 is required to avoid and reduce impacts on an AQMA.
TTV24.1 New Launceston Road Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4G pages 92 and 97, reference WD_45_01_08/13) and the Integrated Assessment (pages 13 and 16 SUB9H). The process of dealing a planning application for residential development has thoroughly tested infrastructure needs and deliverability of development at this location. The site measures 5.6ha, but topography, landscape sensitivity and management of water significantly limit the area of developable land and preclude a higher density of development.	The five criteria (two additional and one deleted) reflect the key issues arising in the process of dealing with the planning application and responses of consultees on the JLP. These are landscape sensitivity (the two additional criteria) and highway safety / congestion. Criterion a carries forward the objective of re-instating a rail link, which is a key element of the sustainability balance for the proposed allocation and of the Tavistock Masterplan SPD.
TTV24.2 Butcher Park Hill Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4G page 97). Planning permission was granted through the appeals process such that infrastructure needs and deliverability of development at this location has been tested thoroughly. The site measures 5.66ha, but topography and landscape sensitivity significantly limit the area of developable land and preclude a higher density of development.	The four criteria (two additional and one deleted) reflect the key issues arising from the appeal decision and responses of consultees on the JLP. These are landscape sensitivity (the two additional criteria) and highway safety / congestion. Criterion c carries forward the objective of re-instating a rail link, which is a key element of the sustainability balance for the proposed allocation and of the Tavistock Masterplan SPD. This and criterion b (pedestrian and cycle links) are essential as the sustainability credentials of this site in terms of accessibility are considered by the Council to be marginal (this was a key point of contention at the appeal).
TTV24.3 Brook Lane Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4G page 97). Planning permission was granted through the appeals process such that infrastructure needs and deliverability of development at this location has been tested thoroughly. The site measures 0.92ha, but topography, landscape sensitivity and the need for extensive water run off attenuation significantly limit the area of developable land and preclude a higher density of development.	As a smaller, less complicated site there is only one criterion, which focuses on the critically important matter of public transport.
TTV24.4 The Trendle Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4G page 97). The process of dealing a planning application for residential development has thoroughly tested infrastructure needs and deliverability of development at this location. The site measures 0.65ha, but heritage, landscape sensitivity and the need for extensive water run off attenuation significantly limit the area of developable land and preclude a higher density of development.	As a smaller, less complicated site there are only two criteria, which focus on the critically important matter of public transport and heritage.
TTV24.5 Mount Kelly Residential	The number of houses and type of housing has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4G pages 92 and 97, reference WD_45_78_16) and the Integrated Assessment (page 13 and 16 SUB9H). The site measures 0.65ha and is restricted to the area that is considered to be previously	As a smaller, less complicated site there are only four criterion (one additional), which focus on the critically important matters of heritage, the linked impact of traffic on an AQMA, the provision of on-site facilities and landscape (see Landscape Impact Assessment EN32 page 38).

	<p>developed land. Heritage, landscape sensitivity and the need for extensive water run off attenuation significantly limit the area of developable land and the nature of development.</p> <p>The balance of sustainability rests with the status as previously developed land, which has determined the extent of the proposed allocation; and meeting a specific need for extra care with on-site services / facilities. If this cannot be achieved the Council does not consider the site to be appropriate for open market housing.</p>	
<p>TTV26 KEVICC, Totnes Residential led mixed use</p>	<p>The site is located in the northern part of Totnes, within the built form of the town and largely comprising PDL. The proposed allocation responds to a long-held aspiration of the school to redevelop, principally to provide better teaching accommodation and improved sports facilities.</p> <p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 76 and 87, reference SH_56_14_08/13) and the Integrated Assessment (pages 17 and 18 SUB9H). Redevelopment of the site would include the re-provision of the school along with associated facilities. The site extends to 12.34ha, but the area available for housing is limited. High density development is likely to be appropriate given the good access to services and facilities that its location offers and the urban character of the locality.</p> <p>Whereas the allocation of other sites in Totnes (that don't already have planning permission) may have significantly adverse impacts on the AQMA, this site offers good connectivity to the main road network and A38 bus routes is well served by pedestrian footways and adjoins the National Cycle Network. Nevertheless avoiding adverse impact in the AQMA is critically important matter to address at planning application stage.</p>	<p>Criterion 1 responds to the recent planning permission granted for an All Weather Pitch and its importance as a school / community facility. Criterion 2 and 4 respond to the opportunity provided by the riverside location, need to protect neighbour amenity, visibility from the town and the historic close relationship that the school has with the local community. The requirement for a SAC impact mitigation plan is entirely appropriate given the importance of this species and the significance of the river to their survival (Criterion 3). Criterion 4 and 5 are necessary to ensure the provision of sustainable movement options, with good linkages to pedestrian and cycle networks (NCN) being easy to achieve and given the existence of an AQMA in the town.</p>
<p>TTV27 Baltic Wharf, Totnes Mixed use</p>	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the Integrated Assessment (pages 17 and 18 SUB9H). The process of dealing with a planning application for mixed-use development has thoroughly tested infrastructure needs and deliverability of development at this location. Development has commenced and is well advanced. The site extends to 10.04ha, but the area available for housing is limited since the site provides an important opportunity for commercial development. High-density development is appropriate, including nursing home / assisted living, given the good access to services and facilities that the location offers and the urban character of the locality.</p>	<p>Criterion 1 responds to an element that has historically been key element of the redevelopment proposals for the site. The planning permission includes provision of a continuing care community including up to 60 bed nursing home and up to 80 assisted living units. Criterion 2 reflects the historic and important function for boat storage with repair and maintenance facilities. Provision for this on a reduced scale is included in the permission. Criterion 3 responds to the importance of enhancing local access to services and facilities and ensuring the site connects well to the town centre for pedestrians and cyclists as well as public transport. Criterion 4 is necessary given the areas of flood risk (see Flood Risk Sequential and Exceptions Test Report F11 page 91). The requirement for a SAC impact mitigation plan is entirely appropriate given the importance of this species and the significance of the river to their survival (Criterion 5). Criteria 3 and 6 are</p>

		required to avoid and reduce impacts on an AQMA. Criteria 7 and 8 respond to the opportunity provided by the riverside location, need to protect neighbour amenity and visibility from the town.
TTV28.1 Dartington Lane Residential	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 81, 82 and 87, references SH_14_18_08/13 and SH_14_19_08/13) and the Integrated Assessment (pages 17 and 18 SUB9H). The site measures 1.71ha with heritage precluding a higher than average density of housing.</p> <p>The site at Dartington Lane lies on the northern edge of the built-form of Totnes. It is adjacent to the main A385 road, giving good access to the district's main road network and to the A38 trunk road. A good level of bus service runs along this road which also offers good footway connection into Totnes and the range of services and facilities available there. The site is also adjacent to the Totnes-Dartington footpath/cycleway which is part of the NCN, and is close to the town's community college and mainline train station. In short, it is in a very sustainable location.</p>	There is only one criterion, which focuses on the critically important matter of heritage (see Heritage Impact Assessment, HE4 page 122). The site boundary has been amended in response to the Flood Risk Sequential and Exceptions Test Report (F11 page 93).
TTV28.2 Great Court Farm Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 80 and 86, reference SH_03_04_08/13) and the Integrated Assessment (pages 17 and 18 SUB9H). The appropriate scale of housing for this site has been assessed through the Development Management process, with a Reserved Matters application for 75 houses approved on 4 April 2017, with infrastructure needs and deliverability of development at this location tested thoroughly.	There is only one criterion, which focuses on the critically important matter of landscape.
TTV28.3 Transition Homes Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 82 and 87, references SH_14_22_13) and the Integrated Assessment (pages 17 and 18 SUB9H). The appropriate scale of housing for this site has been assessed through the Development Management process. Planning permission has been granted for 27 dwellings, with infrastructure needs and deliverability of development at this location tested thoroughly.	Appropriate landscaping has been secured through the planning consent. A condition attached to the consent requires that development shall accord strictly with a Landscape Appraisal Report and a Landscape and Ecology Management Plan.
TTV28.5 ATMOS Mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the Integrated Assessment (pages 17 and 19, 'Dairy Crest' SUB9H). Although the site (3.29ha) could potentially accommodate more than the 62 homes proposed, this is an accurate reflection of the mixed-use basis of redevelopment of the site that is being progressed through a Community Right to Build Order (which has been approved following a successful Examination and Referendum). The mix and scale of uses represent the realistic capacity of	The requirements reflect the provisions of the Community Right to Build Order (March 2017), the Flood Risk Sequential and Exceptions Test Report (F11 page 96), and heritage sensitivity.

	the site, taking account of its constraints and the provision of infrastructure.	
TTV29.1 Woolacombe Road, Bere Alston Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4F page 8 and page 15, WD_48_04_08/13) and the Integrated Assessment (page 21 SUB9H). The site has also been the subject of assessment by the Bere Peninsula Neighbourhood Planning Group. The site is 0.99ha. Landscape sensitivity and the character of the settlement preclude higher density of development.	The four criteria address matters raised in the SHLAA (HO4F) and the Integrated Assessment (page 21 SUB9H). Criterion 1 (as amended) and criterion 4 respond to the SHLAA and the Landscape Impact Assessment (EN32, page 46). Criterion 2 is necessary given the proximity to biodiversity designation. Criterion 3 carries forward the objective of re-instating a rail link, which is a key element of the sustainability balance for the proposed allocation and of the Tavistock Masterplan SPD.
TTV29.2 South of Woolacombe Road, Bere Alston Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4F pages 10 and 15, WD_48_19_08/14) and the Integrated Assessment (page 21 SUB9H). The site has also been the subject of assessment by the Bere Peninsula Neighbourhood Planning Group. The site is 0.67ha. Landscape sensitivity and the character of the settlement preclude higher density of development.	The two criteria address matters raised in the SHLAA (HO4F) and the Integrated Assessment (page 21 SUB9H). Criterion 1 (as amended) responds to the SHLAA and the Landscape Impact Assessment (EN32, page 48). Criterion 2 is necessary given the proximity to biodiversity designation.
TTV29.4 Higher Barton, Dartington Mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 56 and 61, reference SH_14_26_16), the Integrated Assessment (pages 17/19 SUB9H) and the Heritage Impact Assessment (HE4, page 124). The site measures 3.2ha, but heritage sensitivity represents a significant restriction to the nature, scope and magnitude of development. Mixed use is included to maintain and encourage the sustainability credentials at the location.	The criteria have been re-organised following discussion with Historic England. A criterion is included to ensure appropriate assessment of impacts on the South Hams SAC; and a criterion is included to moderate the amount of commercial and retail uses such that development at Dartington would be sustainable and not have an adverse impact on the vitality of Totnes (EC10, page 102)
TTV29.5 Foxhole, Dartington Mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 56 and 61, reference SH_14_27_16), the Integrated Assessment (pages 17/19 SUB9H) and the Heritage Impact Assessment (HE4, page 126). The site measures 6.22ha, but heritage sensitivity represents a significant restriction to the nature, scope and magnitude of development. Mixed use is included to maintain and encourage the sustainability credentials at the location. Flexibility exists given the nature of existing uses at Dartington Estate.	The criteria have been re-organised following discussion with Historic England. A criterion is included to ensure that development will deliver or contribute to improving cycle and walking linkages. A key aspect of the sustainability balance of development at Dartington is that there is a degree of self-containment and that good cycle, footpath and public transport links exist to link with Totnes. The south-western part of the Shops at Dartington adjoins Bidwell Brook and lies within Flood Zones 2 and 3. It is excluded from the site allocation, but any development will need to take account of its proximity and relationship to this watercourse. The policy allows flexibility with respect to uses given the nature of existing uses at Dartington Estate.
TTV29.6 Brimhay Bungalows, Dartington Residential	This site comprises 0.46ha of PDL within the central part of Dartington. It has good access and connectivity credentials. Planning has been granted (October 2017) for 32 new dwellings. Through the Development Management process this scale of residential development has been assessed as being appropriate for the site taking constraints and other factors into account. The allocation in the plan of 12 homes (estimated level of provision) reflects the net gain in the number of the dwellings (18 existing bungalows, 32 new dwellings approved).	The four criteria reflect the key issues arising during the Development Management process.

<p>TTV29.7 Broom Park, Dartington Residential</p>	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 56 and 61, reference SH_14_01_08/13), the Integrated Assessment (pages 17/20 SUB9H). The site measures 7.08 ha with landscape sensitivity precluding a higher density of housing. Land within Flood Zones 2 and 3 has been excluded, but lies adjacent, further restricting the scope of development.</p>	<p>The six criteria address matters raised in the SHLAA (HO4B) and, through criteria 2, 3 and 4, the Landscape Impact Assessment (EN32 page 56). It draws on consultee responses to the Thriving Towns and Villages Booklet (JLP6), which informed the Regulation 18 consultation. Criterion 1 is included to ensure that development will deliver or contribute to improving cycle and walking linkages. A key aspect of the sustainability balance of development at Dartington is that there is a degree of self-containment and that good cycle, footpath and public transport links exist to link with Totnes. This is particularly important with respect to this site since an AQMA exists in Totnes. Development at Dartington is considered to help meet housing need in Dartington and Totnes whilst, with mitigation, not adversely affecting emissions in the AQMA. Criterion 6 responds to the Heritage Impact Assessment (HE4, page 129). Criteria 2 and 6 (added) seek to ensure measures to enhance accessibility and reduce congestion. Criterion 5 is necessary in recognition of the adjacent flood risk area.</p>
<p>TTV29.9 Sawmills Field Residential</p>	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4B pages 50 and 61, reference 14_04_08/13), the Integrated Assessment (pages 17 and 19 SUB9H). It immediately adjoins the site to the east and the Higher Tweed Mill housing development on the other side of the main road is currently under construction. The site is proposed to accommodate approximately 40 homes, which reflects densities on neighbouring land and allows for retention of the hedgerow on the western boundary and the tree-belt to the north.</p>	<p>The four criteria address matters raised in the SHLAA (HO4B). It is appropriate to require that a residential development of this scale has good footpath and cycleway connectivity (criterion 1). The site immediately adjoins the A385 which has a footway running along it, so connecting to this from the site will be easily achievable. This will provide safe pedestrian connectivity to the village and its range of facilities. Connectivity to the main road for cyclists will be equally easy to achieve and this will provide means to access the NCN which runs through the village a short distance from the site. This is particularly important with respect to this site since an AQMA exists in Totnes. Development at Dartington is considered to help meet housing need in Dartington and Totnes whilst, with mitigation, not adversely affecting emissions in the AQMA.</p> <p>The site lies immediately alongside the A385 and will be visible to users of that route. It is therefore important that the design of any development on the site, especially the elements fronting movement routes including the main road, is of a high quality and locally distinctive (Criterion 4).</p>
<p>TTV29.11 Hatherleigh Market Mixed use</p>	<p>The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4F page 50, reference 14_04_08/13), the Integrated Assessment (SUB9H, pages 23 and 24). The process of dealing with an outline planning application has thoroughly tested infrastructure needs and deliverability. The site of Hatherleigh Market extends to 5.06ha and offers one of the largest 'brownfield' development opportunities within the TTV area. The proposed allocation is also informed by the Integrated Assessment (page 23 SUB9H). Key constraints on the scale, scope and nature of development are the flood risk area to the south west, the presence of an abattoir to the north, the</p>	<p>The six criteria address matters raised in the SHLAA (HO4F) and the Integrated Assessment (page 23 SUB9H). Criteria 1, 2, 3 and 5 respond to the importance of regeneration that complements the town centre rather than harming its vitality; Criterion 4 a specific need identified by the community. Criterion 6 recognises the existence of a flood risk area covering part of the site. Outline application (00760/2013) for the proposed site was approved in 2014 for mixed use including Residential (106 units including 11 affordable), Retail (Use Classes A1, A2 and /or A3), Employment floorspace (Use Classes B1, B2 and/or B8), together with new Public Realm including market square with associated pavilion, play space, hard and soft landscaping, community allotments, means of</p>

	role of existing uses in the sustainability credentials of Hatherleigh and the relationship with the town centre and its functions.	access, public and private car parking, and associated infrastructure. Whilst this permission has lapsed the developer has confirmed their intention to re-submit a similar application. It is considered appropriate to carry forward this proposed allocation.
TTV29.12 Hatchmoor, Hatherleigh Mixed use	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (pages 44, 45, 46 and 50, references WD_06_01_08/13, WD_06_02_08/13, WD_06_03_08/13) and the site owners have subsequently confirmed that all plots are available for the development proposed. Whilst the site measures 4.93ha and is not prominent in the landscape, development would extend the built form of the town out into the surrounding open countryside. This limits the scale and density. Hatherleigh has traditionally played an important role in the provision of homes and jobs and has previously been identified as a Local Centre. The proposed site adjoins a successful employment area. Additional land for employment will support and complement the range of job opportunities in the town and, therefore, its self-containment.	The two criteria are informed by the SHLAA (HO4B pages 50 and 61, reference 14_04_08/13), the Integrated Assessment (SUB9H, pages 23 and 24). The site is in a rural setting on a main road entering Hatherleigh, necessitating a landscape led scheme.
TTV29.13 Glenhaven, Lifton Residential	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4F pages 81 and 88, reference WD_35_05_08) and the two site owners have subsequently confirmed that the land is available for the development proposed. Whilst the site measures 6.32ha, development would extend the built form of the town into the surrounding open countryside. The site also lies adjacent to a substantial woodland and a buffer is needed. These factors and landscape sensitivity (see page 64 of the Landscape Impact Assessment, EN32) limit the extent and density of development.	The two criteria are informed by the SHLAA (HO4F pages 83 and 88, reference WD_35_05_08), the Integrated Assessment (SUB9H, pages 23 and 24). The site is in a rural setting on a main road entering Lifton, necessitating a landscape led scheme.
TTV29.15 West of Palm Cross, Modbury Mixed use	A full application (35/0059/15/F) for the proposed site was approved in 2015 for mixed use development on land for erection of B1 use building, 93 dwellings, roads, footways and strategic landscaping. Development has commenced. The provision of additional homes and employment help self-containment of Modbury. The approach of the plan is also informed by the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25).	The site occupies a sensitive edge-of-town location requiring appropriate, high quality design. The heritage assets nearest to the site. The requirements reflect this key point that was assessed through the Development Management process and are also informed by the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25).
TTV29.16 Pennpark, Modbury	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4C pages 21 and 25, references SH_35_13_16 and SH_35_14_16) and the Integrated Assessment (SUB9H, pages 25 and 26). The site is partly previously developed land and is relatively well contained, making it suitable for further development in what is otherwise a location highly sensitive to landscape and heritage impacts.	The site occupies a sensitive edge-of-town location requiring appropriate, high quality design. The requirements reflect this key point that was assessed through the Development Management process for the site to the east and are also informed by the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25).
TTV29.17 West of Barracks	The number of houses has been determined through site visit and subsequent Officer	The site occupies a sensitive edge-of-town location requiring appropriate, high quality design. The

Road, Modbury	assessment, which has informed the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25). The extent, scale and nature of development is restricted by the heritage (Heritage Impact Assessment HE4, page 141) and landscape (Landscape Impact Assessment EN32, page 70) sensitivities.	heritage assets nearest to the site. The requirements reflect this key point that was assessed through the Development Management process for the site to the south and are also informed by the SHLAA (HO4C pages 17 and 25, reference SH_35_02_08/13) and the Integrated Assessment (SUB9H, page 25).
TTV29.18 Bathway Fields, North Tawton Mixed use	This proposed allocation carries forward a site of 4.08ha that already benefits from planning permission for mixed use. The number of houses and amount of employment has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4G, pages 20 and 25, reference WD_13_07_08/13). The process of dealing with a planning application for has thoroughly tested infrastructure needs and deliverability of development at this location. Development has commenced and is well advanced. North Tawton is one of the borough's largest settlements and has previously been designated as a Local Centre. Accordingly, it has an important role to play in making provision to help meet the social and economic needs of that part of the borough. To complement housing growth, it is appropriate to make provision for some employment development to assist with the self-containment of the settlement.	The two criteria are informed by the SHLAA (HO4G, pages 20 and 25, reference WD_13_07_08/13), the Integrated Assessment (SUB9H, pages 26 and 27).
TTV29.19 Bonfire Hill, Salcombe Residential	This proposed allocation carries forward the remnant (0.59ha) of a larger site that has been developed. The density of housing reflects surrounding character.	The two criteria are informed by the SHLAA (HO4D, page 7), the Integrated Assessment (SUB9H, pages 27 and 28).
TTV29.20 Shadycombe, Salcombe Mixed use	The site measures 1.31ha and has been carried forward as a proposed allocation from the current development plan, albeit extended by 0.34ha. The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 2 and 7, references SH_41_02_13 and SH_41_08_16) and the Integrated Assessment (SUB9H pages 27 and 28). The developable area, scope of uses and deliverability has been informed by the significant constraints, notably those identified in the Landscape Impact Assessment (EN32), the Heritage Impact Assessment (HE4).	The four criteria (one added) address matters raised / identified in the SHLAA (HO4D, page 7), the Landscape Impact Assessment (EN32, page 74), through criteria 1 (as amended) and 3 (added). An additional criterion responds to a biodiversity matter identified by Natural England through the consultation process, the Heritage Impact Assessment (HE4, page 146), and the Flood Risk Sequential and Exceptions Test Report (F11, page 106).
TTV29.21 land west of West End Garage, Salcombe	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 4 and 7, reference SH_41_06_16) and the Integrated Assessment (SUB9H pages 27 and 28). Landscape sensitivity precludes a higher density of housing. The process of dealing with a planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted. The site measures 0.89ha, but topography, landscape sensitivity and the need for water run off attenuation limit the scope of development and the density that can be achieved.	The three criteria (two added) address matters raised in the SHLAA (HO4D pages 4 and 7, reference SH_41_06_16); the Integrated Assessment (SUB9H pages 27 and 28); and the Landscape Impact Assessment (EN32 page 77), through criteria 1 (as amended) and 3 (added). Criterion 2 (added) addresses a biodiversity matter identified by Natural England through the consultation process.
TTV29.22	The number of houses has been determined	The three criteria address matters raised in the SHLAA

Green Park Way, chillington	through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 4 and 7, reference SH_53_03_08/13/16) and the Integrated Assessment (SUB9H pages 29 and 30). Landscape sensitivity precludes a higher density of housing. The process of dealing with a planning application has thoroughly tested infrastructure and other related needs and deliverability. Planning permission has been granted. The site measures 3.01ha, but topography, landscape sensitivity and the need for water run off attenuation limit the scope of development and the density that can be achieved.	(HO4B) and the Landscape Impact Assessment (EN32 page 80), through criteria 1 (as amended) and 2. Criterion 2 seeks to ensure measures to enhance accessibility and reduce congestion. Criterion 3 responds to the importance of managing water run-off from the site, which was identified as a key constraint during the process of dealing with the planning application.
TTV29.23 land south east of Carehouse Cross, Stokenham	The number of houses has been determined through site visit and subsequent Officer assessment, which has informed the SHLAA (HO4D pages 4 and 7, reference SH_53_14_08/13) and the Integrated Assessment (SUB9H pages 29 and 30). Whilst the site enjoys good accessibility to the highway network, landscape sensitivity requires a low density of development.	The two criteria address matters raised in the SHLAA (HO4B) and the Landscape Impact Assessment (EN32 page 82), through criteria 1 (as amended) and 2. Criterion 2 seeks to ensure measures to enhance accessibility and reduce congestion.