Plymouth and South West Devon Joint Local Plan Consultation
Response by The Dartington Hall Trust

Land at Lane End Plantation and Paddock, Totnes, TQ9 5LB
Site Reference: (T6 in DPD) 14_56/2246/13/f
Introduction

This document provides information related to the potential use of land at Lane End Plantation and Lane End Paddock, Dartington Lane, Totnes for development. It has been assembled by the Dartington Hall Trust (DHT) drawing on assessments prepared by a multi-disciplinary professional team in response to the consultation on the emerging Plymouth and South West Devon Joint Local Plan. It specifically addresses the question of suitability and deliverability of the sites in terms of their ability to meet identified housing needs in the plan area and the proposed allocation of land in Totnes, including sites in Dartington and Berry Pomeroy. It provides a systematic and thorough analysis to ensure that the Joint Local Plan is founded on a sound evidence base.

The work undertaken and reflected in this document supports the local planning authorities’ inclusion of the Lane End Plantation site. Its key findings are:

- The Plantation site comprises 2.27 ha of land being the undeveloped portion of site T6 included in the Totnes Site Allocation DPD in 2011.
- The site is available and is being promoted for development as a 40 home self-build/custom build housing development by DHT.
- The site is not constrained by technical issues including access, landscape, ecology, or servicing and is considered viable.
- The site is compliant with national planning policy guidance and will assist South Hams in meeting the requirements of the Self-Build and Custom Housebuilding Act 2015.
- The Plantation site is deliverable within a timescale which meets the requirement to demonstrate a five year land supply for housing.

The nearby Paddock site is not identified in the SHELAA and Joint Local Plan documents, but the site was allocated in the previous DPD as Proposal T5 for about 10 homes. DHT has held pre-application discussions with SHDC, and considers that the allocation of this site should be carried forward into the Joint Local Plan, although the number of homes should be reduced to no more than six to reflect the size of the developable area. Please note that the Paddock falls within Totnes, not Dartington Parish.
Site Description

The Lane End Plantation and Paddock sites are located to the east of the A385 Ashburton Road some 600 m to the north of Totnes railway station.

Previously used by DHT as a nursery site with horticultural buildings and a plantation, the Plantation has been cleared and comprises some 2.27 ha of unserviced land accessed via Dartington Lane. There are scrub and trees along the field margins. Dartington Lane runs along the north-west boundary with existing housing to the immediate south and west of the site.
Development Proposal and Context

The Lane End Plantation and Paddock sites are available for development and are being promoted by DHT as a self-build/custom build development for up to 46 homes.

The site was originally assessed in the 2009 SHLAA as site SH_14_19_08 and SH_56_13_08 which highlighted the potential for delivery of 35 homes in period 2015-2019. The site along with neighbouring land ownerships was then assessed as part of the Totnes site allocations process as having the potential to accommodate some 80 dwellings. Subsequently three adjoining sites in separate ownerships were allocated in the Totnes Site Allocations DPD in 2011 as a single site (T6) for about 50 dwellings and about 2 ha of employment land.

Bloor (Millwood) Homes subsequently submitted an application for 50 dwellings on the part of this allocation (14_56/2246/13/F) which was granted consent. This development which is now substantially complete lies to the north of the Lane End Plantation site. Meetings and correspondence with officers of SHDC have confirmed that the balance of the site is suitable for a self-build/custom build development reflecting the fact that a stand alone employment development would not be viable.

There is no history of planning applications on the Lane End Plantation site. However, DHT has commissioned work on technical issues for this site and has established an advisory group of local residents, self-build experts and other stakeholders to help refine objectives and approach to the early delivery of this site as an innovative development aimed at meeting the housing needs of local people. It is intended that the learning from this project will inform the delivery of other housing developments being promoted by DHT.
Site Technical Assessment

Access

The Lane End Plantation and Paddock sites are very well located for sustainable access to Totnes and Dartington and the wider public transport network. It is also conveniently located for access to the wider road network.

There is a major public footpath connecting Dartington Lane with facilities and services in both Totnes and Dartington as well as the wider footpath network. Totnes railway station lies approximately 600 m to the south-east. This route is shared with National Cycleway providing safe, level off-road access to Totnes station and services.

Bus stops on the Ashburton Road are nearby and routes provide frequent services to and from Totnes town centre and other destinations.

Dartington Lane will require improvement for approximately 100 m to the site entrance and improved visibility splays will be needed. Improvements to pedestrian crossing at the junction may be appropriate if new bus stops are desired.

The access appraisal concludes that there are no material highway or transportation matters that would preclude the Local Planning Authority (LPA) from approving any planning application for residential development at Lane End Plantation.

Utilities

Foul drainage is likely to require pumping to ensure connectivity to SWW network. There are no other utilities constraints that have been identified.

Delivery

The results of the technical assessment work confirms that there are no issues that would impede delivery and viability of the site and its ability to contribute to the district’s identified housing requirements. DHT has, in consultation with the local community and council officers, been progressing plans for a large-scale self-build scheme. One consideration is a mechanism to enable rapid and certain delivery despite self/custom builders working to different financial and personal time frames. DHT would like to explore with the council the potential for use of Local Development Orders as an exciting and proactive way of managing a self-build scheme on such a scale. It is therefore considered that this site can contribute to the housing land supply within the five year period.
Site Suitability Assessment

Location

The sites are very well located for access to services lying within the new northern development boundary of Totnes established by the recent Bloor Homes development. The KEVICC secondary school is 200 m from the sites and three primary schools – the Grove School, Dartington C of E Primary School and Park School – are all located around a mile from the site. Totnes is the administrative hub of South Hams and the full range of employment, leisure, medical and community services are available in close proximity to the site, accessible by safe, sustainable transport routes and public transport.

Flood Risk

The northern section of the Plantation and Paddock sites slope down to Bidwell Brook and are in Flood Zone 3a, making these areas unsuitable for development.

Ecology

The sites do not lie within any statutory or non-statutory designated sites but they do lie adjacent to Queens Marsh County Wildlife Site.

There are a number of potential protected species associated with the site. As such, development proposals need to be informed by further survey and assessment. An Ecology overview report has been produced by EAD which outlines a scheme of detailed assessments to support mitigation considerations in scheme design including:

- Extended Phase 1 Habitat Survey.
- Ecological Impact Assessment (EcIA).
- Bat Activity Survey (cf South Hams Special Areas of Conservation (SAC) Planning Guidelines).
- Possible other surveys if indicated (reptiles, amphibians, breeding birds, invertebrates).

The sites fall wholly within the potential foraging area for Greater Horseshoe Bats from the South Hams SAC. The design of any development in the area should reinforce potential flyways through landscaping and will be subject to appropriate mitigation for example conditions on external lighting.

Based on the desk-based environmental assessment, no overriding ecological constraints to development are identified. Appropriate licences and on site mitigation and enhancement will be required for any notable species.
Heritage Impacts

A detailed assessment of heritage impacts will only be possible when the sites for development have been defined firmly and their nature and layout have been planned. It is likely that impacts on significance, if any, will result from changes to the settings of heritage assets in the vicinity. The heritage assets at Lane End have been identified and assessed in the estate’s Heritage Management Overview (which accords with Step 1 in the structured approach to the assembly and analysis of relevant information when managing change affecting heritage assets, as set out in paragraphs 6 of Historic England’s Historic Environment Good Practice Advice in Planning: 2 and paragraph 12 of its Historic Environment Good Practice Advice in Planning: 3). That assessment shows that there are three designated heritage assets lying immediately to the north of Lane End Plantation and Lane End Paddock: the Grade II listed 19th century Dartington Lodge, a Grade II listed stone bridge directly to its north, and a long projecting finger of the Dartington Hall Grade II* registered park and garden, which terminates south of the Lodge abutting Lane End Plantation.

Historic England’s Historic Environment Good Practice Advice in Planning: 2, referred to above, observes:

Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance.

A detailed assessment of the settings of the three designated heritage assets at Lane End is currently being prepared to accord with Step 2 of guidance in paragraph 12 of the Historic Environment Good Practice Advice in Planning: 3. The overlapping settings of these three heritage assets will inevitably dictate the placement of new development. Early indications from the assessment work are that there is scope at Lane End to provide new development with acceptable levels of impact upon the significance of heritage assets in the locality.
Planning Policy Review

The consultation document issued on the South West Devon Joint Local Plan indicates that outside of Plymouth planning policy sets out to focus development on the market towns where employment, transport and community services are available. The Lane End sites represent a very good opportunity to deliver sustainable development which supports the sustainability objectives promoted by the council(s). In combination with the Transition Homes and Atmos proposals, this development adds to the drive for additional/alternative paths to housing delivery which will lay groundwork for councils around the country.

DHT share with the Council the overarching aim to produce a sound local plan in order to guide development in a sustainable way over the coming years. This planning assessment includes reference to both policy compliance for proposed development and plan-making compliance for the forthcoming pre-submission Draft Local Plan.

Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 the local development plan provides the primary guidance in consideration of planning proposals. However, this consultation is intended to inform the content of the new Joint Local Plan for the area so initial consideration of appropriateness of allocations and policies is based on the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

National Policy – Planning Balance

The allocation of land for development at Lane End Plantation and Paddock presents an opportunity to satisfy the NPPF objective to “significantly boost the supply of housing”, and the requirement for Local Planning Authorities to make plans and to determine planning applications based on the “presumption in favour of sustainable development”.

Specifically, development is supported by the following:

- NPPF 7 notes that there are three dimensions to planning; economic, social and environmental. This proposal provides an opportunity to deliver housing in a well-located area, which avoids more sensitive environments and landscapes. This provides an opportunity to indirectly support the social aims of DHT and to make provision for housing for significant numbers of people employed locally.

- NPPF 17 identifies core principles including to “proactively drive and support sustainable economic development to deliver the homes, infrastructure and thriving local places that the country needs”.

- NPPF 63 states that in determining applications, great weight should be given to outstanding or innovative designs, which help raise the standard of design more generally in the area. This site is anticipated for development as a locally-responsive self-build site which provides an opportunity to fulfil this objective.
NPPF 118 notes that local planning authorities should aim to conserve and enhance biodiversity through avoidance, mitigation and enhancement. Supporting low impact development in this site within the development boundary helps achieve the required housing needs for the district without incursion into areas of undisturbed or sensitive ecology.

NPPF 14 (and 197) highlights the presumption in favour of sustainable development. For decision-taking, this means:

*In the absence of a robust plan the council should grant permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits... or specific policies in this Framework indicate development should be restricted.*

Based on this appraisal, it is clear that this site accords with the requirements of the NPPF and the principle of development on this site would be well supported by national policy.

**National Policy Plan Soundness**

The NPPF sets out a number of requirements for plan making. NPPF 182 summarises the tests of soundness as being: *Positively Prepared, Justified, Effective and Consistent with national policy.* The inclusion of Lane End Plantation helps meet these tests with particular support for the following:

- NPPF 15 highlights that policies in Local Plans should follow the approach of the presumption in favour of sustainable development.
- NPPF 35 requires that plans should ensure development is located where it can exploit opportunities for the use of sustainable transport modes for the movement of goods or people etc. The Lane End Plantation site provides ready access to the NCN2, public transport, and the strategic road and rail network.
- NPPF 37 seeks to ensure planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. Again, an allocation in this site supports this requirement.
- NPPF 47 requires councils to boost significantly the supply of housing, plans must identify developable and deliverable sites to meet their objectively assessed needs; this test of soundness is one of the most carefully examined. This site can contribute to meeting the council’s identified need, including delivery within years one to five.
- NPPF 173 notes the need for plans to be deliverable including considerations of viability. Allocating this site provides a more diverse basis for delivery.
Local Policy Analysis

South Hams District Council is in the process of updating its Local Development Framework which was put in place in 2006. Site allocations which flowed from the Core Strategy in Totnes and Dartington have largely been taken up or are in the process of progressing. The Joint Local Plan is required to provide for new homes and employment to 2034 which necessarily requires additional sites to be brought forward. Much of this is being focused on Plymouth and the urban fringe. The market towns and area centres of South Hams and West Devon remain the focus of development needs. With limited land now available within the parish boundaries of Totnes, local policy is necessarily looking to the adjoining parishes of Dartington and Berry Pomeroy to meet the objectively assessed needs in this part of the South Hams.

The Plymouth and South West Devon Joint Local Plan will replace the Local Development Framework (LDF) which provides guidance with respect to development proposals which may be permitted in the South Hams. The suitability of the Lane End Plantation site for development was accepted in the allocation of the site as part of the T6 allocation made in the Totnes Site Allocations DPD (2011). The work undertaken for DHT has not identified any reason why the undeveloped part of this allocation should not be carried forward into the Joint Local Plan.

Neighbourhood Planning

Dartington Parish and Totnes are both designated Neighbourhood Plan areas. DHT has been actively engaged with the Neighbourhood Plan process for Dartington Parish and aims to align the Trust’s development opportunities with the objectives of the local community. As emerging Neighbourhood Plans will be required to be compliant with Adopted DPDs, development of this allocated site will be proposed in neighbourhood engagement.
Summary

The information and analysis contained in this document demonstrates that:

• Retaining this development allocation is appropriate and the principle of development on this site should be accepted.
• A review of technical and design issues makes it clear that the scheme is deliverable.
• On the basis of current policy, and in light of the lack of site constraints, this site could begin to deliver in the five year time frame if there was a compelling need to make it available earlier.

Proposed Delivery Programme

Years one to five – 46 homes

It will be for the council to determine the specific allocations and wording. However, in light of the unconstrained nature of the site, it is recommended that this allocation be made in the form of ‘up to 46 dwellings’. Use of the ‘up to’ clause will provide clarification that any development proposal will not be excessive.

Consultants

The appraisals have been prepared by the Dartington Hall Trust with support and advice from specialist consultants including:

Planning advice – Prof Chris Balch, Professor of Planning, Plymouth University
Planning advice – Mary Elkington, Figura Planning
Masterplanning and Estate Framework – Studio Partington
Heritage – Stephen Bond, Heritage Places
Transport Assessment – Hydrock
Surface and foul drainage infrastructure – Jubb Consulting Engineers
Ecology – EAD Ecology
Figure 2: Site Location Plan
Scale 1:5000 @ A3
Figure 3: Site Constraints Plan
Scale 1:1250 @ A3

Key to Site Constraints Plan

- Site boundary (as based on OS Plan)
- Flood zone level +7.5
- Existing landscape zones
- Existing drainage & no build zone
- Cat B Tree
- Cat C Tree
- Dead Tree - to be removed
- Flood protection areas
- New reinforced planting
- Open Silva connections
- No build zone -proximity to listed building