



Ref: RU/A089688-2

Date: 5th January 2018

Robert Young
 Programme Officer
 Joint Local Plan Team
 Strategic Planning and Infrastructure
 Plymouth City Council
 Ballard House
 West Hoe Road
 Plymouth
 PL1 3BJ

Dear Sir/Madam,

PLYMOUTH & SOUTH WEST DEVON JOINT LOCAL PLAN MATTER 8: PRE-HEARING STATEMENT

We are pleased to enclose a pre-hearing statement on behalf of Millwood Homes SW Ltd that has a controlling interest in the TTV5 allocation at Land at Cotton, Dartmouth.

Policy TTV5 – Land at Cotton, Dartmouth

We support the proposed allocation for 450 dwellings as set out in Policy TTV5 and the latest modifications, however we wish to clarify how the proposed 10,800 sqm of 'employment land has been calculated.

We assume that the proposed reference to employment "land" is in error and the policy should refer to employment "floorspace" as this is how other policies are framed. We also presume that this should refer to provision of 2.7 hectares of employment land as approved on part of the proposed allocation by application 15_51/1710/14/O and no more. By contrast, 10,800 sqm of employment land would equate to only 1.08 hectares of employment land, less than half that already consented. We would be grateful if the Council would clarify these two points.

Current Planning Application

As described above, application 15_51/1710/14/O has already been approved on part of the proposed TTV5 allocation. This part of the allocation relates to land allocated under the Dartmouth Allocations DPD. A planning application has been submitted on 27 October 2017





for the remainder of the TTV5 allocation pursuant to application reference 3475/17/OPA. The approved part of the allocation is referred to as phase 1 and the remainder, subject to the current application, is referred to as phase 2. A combined masterplan showing the two phased development areas and how they are connected is appended. The masterplan also shows the significant areas of green infrastructure provided to the south boundary of the site in order to provide strategic landscaping in accordance with part 4 of Policy TTV5.

The submitted application for phase 2 describes how all of the Policy TTV5 requirements are complied with and that the impacts of the proposed development have been assessed and appropriate mitigation is proposed where necessary. Particular regard has been given to the landscape impact of the development. Significant green infrastructure buffer areas are provided to mitigate any adverse visual impact on the AONB, and soften the edges of the development onto the undeveloped countryside.

Traffic arising from the development has been assessed and modelled to demonstrate that all surrounding road junctions would still operate within their intended capacity. The combined development will therefore not bring about undue congestion or highway safety issues on surrounding roads.

Appropriate ecological surveys have been undertaken for protected species and appropriate mitigation measures proposed. These measures include maintaining dark corridors for bats, additional hedge planting for dormouse (even though none are located at the site) and a landscape planting scheme designed to enhance biodiversity.

The proposed drainage scheme would ensure that surface water does not discharge from the developed site any quicker than the current greenfield runoff rate of the existing fields. This ensures that the development does not cause potential flooding elsewhere.

Public Open Space is provided in accordance with the Council's guidance and additional green infrastructure areas proposed. The setting of any heritage assets is satisfactorily maintained.

Having assessed the impacts of the development to be relatively modest, by contrast the proposed development is considered to propose significant sustainable benefits. These benefits include delivery of housing and affordable housing in a context of an acute shortage of both. The site is in a highly sustainable location with good access to jobs, local services and sustainable transport options. This development, when combined with the approved phase 1 development, provides a





comprehensive development that meets the identified needs of the town. Given the constrained nature of the town, there are no other reasonable or available alternatives that can meet this identified need. This adds to the importance of delivering this sustainable development site.

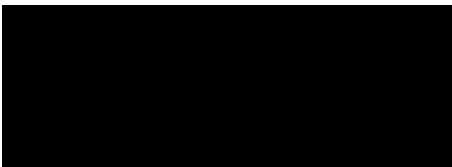
Policy DEV8 – Affordable Housing

In line with our previous Reg 19 representations, we continue to support the proposed levels of affordable housing provision at 30% as stated within draft Policy DEV8 albeit with the changes stated in our previous representations in respect of the inclusion of a “minimum” target.

We note that the proposed modifications to the Joint Local Plan, submitted to you in December 2017, seek to address this inconsistency by adding “at least” to the 30% provision. We consider that this new proposed wording does not address the matters raised in our previous representations for the reasons that we have already stated in respect of providing certainty for developers. It implies that viability assessment will need to be submitted with every planning application to demonstrate why more than 30% affordable housing cannot be provided.

We trust that this pre-hearing statement provides an overview of the issues and matters to be discussed at the examination hearing for Matter 8, and we look forward to attending the session in due course.

Yours sincerely



Robin Upton
Director
For and on behalf of WYG

CC: Bloor Homes South West Ltd





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Phase 1 layout approved by outline application 15_51/1710/14/O

- Proposed buildings
- Private rear gardens
- Plot frontages
- Primary road network
- Shared surfaces

Phase 2

- Proposed buildings
- Private rear gardens
- Plot frontages
- Primary road network
- Shared surfaces
- POS
- Amenity green infrastructure
- Landscape buffer to Venn Lane
- Proposed hedgerow
- Proposed landscaping



**Millwood Homes
West Dartmouth Phase 2
Urban Layout: Masterplan**

A097890drgMP01

12 June 2017
Scale 1:2000@A1

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