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 Bloor Homes South West Ltd that has a controlling interest in land West of Barracks Road, Modbury, which is proposed to be allocated for 40 dwellings pursuant to draft Policy TTV29 (Site 17).

Background

By way of background information, WYG and Bloor Homes have carried out pre-application discussions with regard to the submission of a planning application for the site. Bloor Homes achieved permission for 93 homes (Council Ref: 35/0059/15/F) on land adjacent (south) of the proposed allocation that is currently under construction. The proposed allocation would effectively provide an extension to the current development site that was allocated in the adopted Rural Areas Site Allocations DPD (Policy RA1: West of Palm Cross Green). We refer to the consented area as Phase 1 and the proposed additional allocation of 40 homes as Phase 2. It is hoped that the construction team can continue to develop the Phase 2 development, without having to pull off site. This will ensure a more efficient and timely delivery of the phase 2 site.

Bloor Homes has recently carried out a well-attended public consultation exhibition with regard to the Phase 2 development. The exhibition display boards are appended that demonstrate the connectivity between phase 1 and phase 2. An emerging layout is also shown.
on the boards. Feedback from the exhibition was generally positive. Some comments in relation to the layout have been taken on board and will result in an amended layout.

On this basis, we fully support the scale of housing (40 dwellings) at land West of Barrack Road, Modbury (the “proposed allocation site”) which we consider to be justified having regard to identified planning constraints and infrastructure requirements to support this growth. The proposed allocation site is located to the western edge of Modbury, and is well located to the settlement, being surrounded to the south and the east by existing residential development. A further extension of development to the west of Barrack Road would appear to be a logical progression given the wide housing needs and spatial strategy outlined in the draft JLP, and taking into account the following constraints:

**Landscaping and Visual Impact**

The proposed allocation site lies to the north of the South Hams AONB and to the south east of Dartmoor National Park. Landscaping is therefore a key consideration and on this basis, a site-specific landscape and visual assessment (LVIA) has been carried out, in accordance with draft Policy TTV29. The LVIA has concluded that there will be no adverse impacts in terms of landscaping and views towards and from the AONB and Dartmoor National Park. This is due to the distance between the development and the statutory landscape designations, and the use of strategic landscaping along the western and northern boundaries of the site. This landscaping will form an important extension to the wider landscaping and open space currently under construction to the south west as part of Phase 1 and required by TTV29 for Site 15, West of Palm Cross, Modbury (hereinafter referred to as the “Palm Cross development”). The LVIA includes a full assessment of lighting impacts and potential mitigation measures, and is supported by a landscape strategy masterplan.

**Transport and Access**

A site-specific Transport Assessment and Travel Plan has been undertaken to confirm that there is no need for off-site highway works to support the level of growth proposed. A suitable vehicular access can be achieved via the Palm Cross development. This access strategy means that there will be no requirement for any new vehicular accesses on to the existing adopted highway network and will ensure that impacts on traffic flows along Barrack Road are minimised. Pedestrian access between Phase 1 and Phase 2 will also be provided to promote inclusive access for all.
Flooding and Drainage

Modbury town centre itself has experienced significant flooding within the last decade, to some extent exacerbated by surface flows being conveyed along the main high street (A379). The proposed allocation site and wider town is located within a Critical Drainage Area. Notwithstanding this, it is considered to be the most sustainable option for housing growth in terms of flood risk and drainage because it is located in Flood Zone 1 (low risk) and its surface flows will drain away from the town centre, where the existing fluvial and surface water flooding issues are known to cause damage to people and properties. A site-specific Flood Risk Assessment has been carried out which confirms that flows can be attenuated within the development to the 1 in 100 year storm event (+ climate change) whilst discharging at the 1 in 10 year Greenfield run-off rate. This is in line with best practice advice from the Lead Local Flood Authority in respect of the Critical Drainage Area and will ensure that flows from the proposed allocation site will be no greater (both in terms of flow and volume) compared to the existing Greenfield scenario.

Ecology

A full suite of ecological surveys has been undertaken throughout 2017, and it has been found that the ecological importance of the site is mainly confined to the hedgerows along the boundaries which provide suitable habitat for dormice and bats. The development strategy is very much one of avoidance of impacts, including the retention of hedgerows where possible, with appropriate buffers and lighting achievable within the indicative layout for 40 dwellings. Where hedgerow must be lost to facilitate vehicle and pedestrian access, replacement will be provided on an at least 2:1 ratio.

Heritage

No evidence of archaeological significance was found during the construction of the Palm Cross development, and as a result it is considered that no intrusive investigations are required to demonstrate the feasibility of a residential development at this location. This view has been supported during pre-application discussions with Devon County Council’s archaeologist.

A heritage assessment would be required to support any development proposals and this has already been carried out. The assessment confirms that the delivery of the proposed allocation site will have no impact on the Listed wall located to the north of the site, or the setting of any other heritage assets including the historic core of Modbury itself.
Noise
A noise assessment has been carried out given the proximity of the local road network and to determine impacts on residential amenity to and from the site. The assessment confirms that there will be no significant impacts on occupiers of the development and existing properties.

Sustainable Development
It is considered, based on the consideration of the above key constraints, that the development of 40 dwellings at the proposed allocation site represents sustainable development with all impacts being demonstrated to be capable of mitigation through site-specific assessment. In terms of drainage and landscaping in particular, the delivery of the proposed allocation site offers sustainability benefits by avoiding development that drains to the critical catchment and providing a strategic landscaping buffer between the edge of settlement and the Dartmoor National Park.

Housing Trajectory and Five-Year Supply
An outline planning application is anticipated to be submitted to South Hams District Council ahead of the Examination Hearing for Matter 8, scheduled on 27th February 2018. The submission of an outline planning application demonstrates the promoter’s desire to deliver upon the allocation in the short term.

The construction of Phase 1 is due to be completed in Autumn/Winter 2018, with the intention being that the same construction team continues without interruption on to the proposed allocation at land to the West of Barrack Road. Based upon these timescales, it is anticipated that the allocation could be delivered in full by Spring/Summer 2020.

The Housing Trajectory submitted in November 2017 by SHDC indicates that 10 dwellings will be completed in 2019/20 and the remaining 30 dwellings in 2020/21.

Based on the above we strongly consider that the allocation can deliver its share of the five-year housing land supply at the point of adoption, and may well exceed these projections. We therefore have no issue with the trajectory submitted in terms of its flexibility to ensure that housing supply will be maintained.

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.

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
LAND WEST OF
PALM CROSS GREEN
MODBURY
PUBLIC EXHIBITION OPEN NOW

BLOOR HOMES
Bloor Homes is preparing proposals for approximately 40 new homes adjacent to the existing development site at land to the west of Palm Cross, Modbury, with access being achieved through the Bloor Homes Palm Cross Phase 1 development to the south.

Palm Cross Phase 1 was granted planning permission in January 2015 and is now substantially built out. This exhibition outlines the proposals for Phase 2 of the Palm Cross development and provides an opportunity for feedback ahead of a forthcoming planning application to be submitted to South Hams District Council.

Please take the time to view all of the information we have provided for you today. We welcome your feedback and please feel free to speak to a member of the project team about any queries you may have. Feedback forms are available at this exhibition and on our website:

www.wyg.com/consultations/palm-cross-modbury
The development site is known as Phase 2 and is located to the north of the Phase 1 scheme which has been granted permission and is now under construction.

The Phase 2 site is proposed to be allocated for 40 residential units within South Hams District Council's Joint Local Plan. This Local Plan sets out the planned housing growth required across the District over the next 20 years. The proposals will help to meet housing and planning objectives set by South Hams District Council. Currently, the Council has a significant housing shortfall, which is why the application is being prepared now.

Detailed assessments are being carried out to understand any impacts on roads, flooding, ecology and landscaping and to make sure that the development takes these into account. These assessments will be made available as part of the planning application submission.
Vehicle access to the site will be from the Palm Cross Phase 1 development to the south. A pedestrian access from Phase 2 will link to the Phase 1 play area.

The new housing will be separated by existing properties at Long Park by around 35m, including a landscaping belt which will reduce views between the buildings. This distance exceeds the normal planning requirement of 21m. There will be a focus on including a landscape buffer to the west of the site to protect views to and from the South Devon Area of Outstanding Natural Beauty to the north and Modbury’s rural character. For this reason, existing hedgerows and trees will be retained where possible, but also to protect any ecological habitat and routes within the site. The landscape buffer continues on from the buffer to Phase 1 ensuring that both the developments are appropriately screened.

Within the landscaping area to the west, additional drainage areas will be provided. The development will also include new foul drainage infrastructure to accommodate the new homes on the network.
12 affordable housing units will be provided within different sized properties, offered either to rent or with an option for low cost home ownership.

Pedestrian link between the play area and the development.

Landscaping will ensure that the development blends into its surroundings and retains the rural character of Modbury.

The existing green space to the west of Phase 1 will be extended further north.
Thank you for visiting the exhibition today. If you have any questions, please do ask one of the project team here who will be happy to help.

The feedback you provide is really important to us as we work towards submission of a planning application. Please use the feedback forms to provide any comments you may have, and leave completed forms in the box provided.

Alternatively, you can:

Take a form away with you and post it back to: WYG, Hawkridge House, Chelston Business Park, Wellington, TA21 8YA

Email us with your comments at: planning.wellington@wyg.com

Download a form from our website: www.wyg.com/consultations/palm-cross-modbury

Please note that the deadline for receiving comments is 6th December 2017.