

26 October 2017

Sue Crowther
Thurlestone Parish Council
Thurlestone Village
Devon

67–69 George Street
London, W1U 8LT
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020 7148 5600

By Email

Our reference: I-lw-tpnp rep-261017

Dear Ms Crowther

REPRESENTATIONS TO THURLESTONE PARISH NEIGHBOURHOOD PLAN 2015 – 2034 PRE-SUBMISSION CONSULTATION DRAFT

We write on behalf of our client, Church Farm (Amenities Ltd), who have appointed us as their planning advisors, to submit representations to the Thurlestone Parish Neighbourhood Plan ("the Plan") 2015-2034 Pre-Submission Consultation Draft. Church Farm (Amenities) Ltd is a management company for the residents of Church Farm, Thurlestone.

Background

On behalf of Church Farm, we submitted representations to the draft pre-submission Plymouth and South West Devon Joint Local Plan and attach a copy of the representations for your information.

In our representations, we supported the principle of the Joint Local Plan allowing for Neighbourhood Plans to identify the location and size of development in each village. Notwithstanding this, we considered that the number of houses each Sustainable Village can accommodate and sustain will vary from village to village and will be subject to the availability of appropriate land which will not impact on the character and special qualities of the Area of Outstanding Natural Beauty; and the facilities in each village. We requested that the supporting text to Policy TTV30 be amended to state that villages are able to accommodate around 10 or "less" dwellings each and to be on sites "if appropriate" and available.

Representations

The Plan's housing objective seeks for small-scale housing in the Parish, of the right type and in the right location, and for it to contribute towards making the Parish more sustainable for the future. The Plan does not allocate any sites for development but instead takes a holistic approach to sustainable development by looking at the Parish in the context of the village network. As part of the Plan, the boundaries for settlements have been reviewed and assessed, including Thurlestone. The policies in the Plan prioritise infilling and the protection of the Countryside and the Plan states that "in accordance with the wishes of the community, the settlement boundary for Thurlestone to 'largely remain 'as is' (subject to three minor revisions) so as to prevent further sprawl into the open countryside (AONB, Heritage Coast and Undeveloped Coast)".

Church Farm supports the proposed retention of the existing settlement boundary for Thurlestone, as illustrated in Figure 7 (Policy TP2 - Settlement Boundaries). This approach will ensure that the character and sustainability of Thurlestone will be protected and that only appropriate, small-scale infill housing developments will be brought forward.

Policy TP4, part 2, states that "proposals for open market housing on land adjoining the settlement boundaries

designated in this Plan, including agricultural or amenity land, and in the open countryside within the South Devon AONB, Heritage Coast and Undeveloped Coast will not be supported unless there are special circumstances, such as” (summarised below):

- i. the essential need for a rural worker to live in the countryside; or
- ii. where development would optimise or secure the future of heritage asset; or
- iii. re-use of redundant or disused buildings; or
- iv. the exceptional quality or innovative nature of the design of the dwelling.

This Policy allows for sites adjoining defined settlement boundaries in the Plan to be brought forward for open market housing developments, subject to adhering to the special circumstances criteria. Notwithstanding this, it is our opinion that this approach does not accord with the objectives of Policy TP2 which seeks for small-scale infill development located within the defined settlement boundaries, so as to prevent further sprawl into the countryside. As currently worded, Policy TP4 provides the opportunity for agricultural land surrounding Thurlestone to be brought forward for future housing development. We request that Policy TP4, part 2, is amended to exclude Thurlestone, as the village has seen 38 completely new or additional dwellings since October 1998, of which 13 have been granted since 2014 (para 3.30 of the Plan). Any further development outside the defined settlement boundary, would significantly impact on the character and sustainability of Thurlestone village and result in further sprawl into the countryside.

We trust that the above representations will be considered and request that we are kept informed on the progress of the Draft Thurlestone Neighbourhood Plan.

We look forward to hearing from you in receipt of this representation. Should you have any queries please do not hesitate to contact me or my colleague John Bowles.

Kind regards



Lisa Walton
For and on behalf of Porta Planning LLP

Enc: as listed above

26/04/17 16:30

Comment Receipt

Event Name	Plymouth and South West Devon Joint Local Plan
Comment by	Porta Planning (Mr John Bowles)
Comment ID	708
Response Date	26/04/17 16:30
Consultation Point	Policy TTV30 Empowering local residents to create strong and sustainable communities (View)
Status	Submitted
Submission Type	Web
Version	0.1
Are you acting as an agent on behalf of someone else?	Yes
Title	Mr
First name	John
Last name	Bowles
Job title (where relevant):	Partner
Organisation (where relevant):	Porta Planning LLP
Address:	
	67-69 George Street, London
Postcode:	W1U 8LT
Name of consultee you are submitting on behalf of:	Church Farm Estate
Where relevant	

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Policy TTV30

Do you consider the Local Plan to be:

(1) Legally compliant Yes

(2) Sound No

(3) Compliant with the Duty to Co-operate Yes

Please be as precise as possible. If you wish to support the Plan please also use this box to set out your comments.

5. Please give details of why you consider the Local Plan is not legally compliant, unsound or fails to comply with the duty to co-operate.

This representation is submitted on behalf of Church Farm Estate, the management company for residents of Church Farm, Thurlestone. Figure 5.8 of Policy TTV30 identifies Thurlestone as a Sustainable Village and able to accommodate 10 dwellings over the plan period. We support the principle of the JLP for Neighbourhood Plans to identify the location and size of development in each village. Notwithstanding this, the number of houses each Sustainable Village can accommodate and sustain will vary from village to village and will be subject to the availability of appropriate land which will not impact on the character and special qualities of the AONB; and the facilities in each village. In the last 8 years, land to the south of Thurlestone has been developed to provide 16 new houses and approval of reserved matters for Phase 3 of this development was granted on 17 February 2016 (app ref: 2911/15/ARM) to provide a further 8 new houses. A Housing Needs Survey was prepared by South Hams District Council on behalf of Thurlestone Parish Neighbourhood Steering Group in 2016 and the report refers to planning consents for new houses in Thurlestone and in total an additional 11 new properties are to come forward. Given the above, it is our opinion that another development site of 10 dwellings would not be appropriate for Thurlestone as it would adversely affect the character and sustainability of the village. We therefore request that the text in Figure 5.8 is amended to state "Villages able to accommodate around 10 *or less* dwellings each". We further request that the wording of the text in the supporting paragraph 5.158 to Policy TTV30 is amended to state "neighbourhood plans for sustainable villages within the AONB are encouraged to identify small scale sites of below 10 dwellings *if appropriate and* available, to limit the potential impact on the sensitive AONB landscapes". This will limit any further large scale development coming forward and impacting on the character of Thurlestone. This approach is in line with the JLPs approach in that "...development should not be of such a scale that will result in significant landscape impact or pose a threat to the integrity of the special qualities of the AONB".

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

6. Please set out what changes you consider necessary to make the Plan legally compliant or sound and why, thinking about what you identified in Question 5.

We request that the text in Figure 5.8 is amended to state "Villages able to accommodate around 10 *or less* dwellings each". We further request that the wording of the text in the supporting paragraph 5.158 to Policy TTV30 is amended to state "neighbourhood plans for sustainable villages within the AONB are encouraged to identify small scale sites of below 10 dwellings *if appropriate and* available, to limit the potential impact on the sensitive AONB landscapes".

If your representation includes a proposed modification to the Plan, do you consider it necessary to participate at the public examination?

Yes - I wish to participate at the public examination

Please note the Inspector will determine the most appropriate way to run the examination.

If you wish to participate at the public examination, please outline why you consider this to be necessary:

To participate in discussions with the Inspector and Council on the most appropriate form of amendment to the JLP.