**Plymouth and South West Devon Local Plan Regulation 19 Consultation**

**Representations of Bigbury Parish Neighbourhood Plan Steering Group**

**Strategic Policies**

**2. Vision for Plymouth and South West Devon (page 8)**

We support the Vision of the Joint Local Plan particularly in relation to South West Devon’s Thriving Towns and Villages.

**Strategic Objectives of the plan (page 11)**

We support the strategic objectives of the plan

**Strategic Objective SO1: Delivering the spatial strategy (page 13)**

We support this objective and also the statement at para 3.10 that development in sustainable rural villages should support an appropriate and proportionate level of growth over the plan period. We also agree that within the countryside and its small settlements only a limited amount of development would be appropriate (para 3.11).

**Policy SPT1: Delivering sustainable development (page 15)**

We support this policy particularly in relation to providing a sustainable society. We consider that it is important for a sustainable society to have a mix of local services and community assets, and accessible green space, that meet the needs of local people and that where these facilities exist they should be protected.

**Policy SPT2: Sustainable linked neighbourhoods and sustainable rural communities (page 17)**

We support this policy.

**Policy SPT3: Provision for new homes (page 20)**

We question the overall need for at least 26,700 dwellings (net) in the Plan Area and for at least 7,700 new homes in the Thriving Towns and Villages Policy Area. We understand that South Hams have included an extra 900 homes which are supposed to be provided in West Devon and have inflated their housing need numbers to take account of second home vacancy. Whilst we agree that there is a high demand for second homes in South Hams this demand is likely to fall due to the higher levels of Stamp Duty and providing additional homes with a view to reducing house prices is unlikely to be a successful strategy. House builders will not build more homes than needed as they will only build at a rate which is the same as the demand as they do not wish to overflood the market resulting in homes standing vacant for long periods.

Bigbury Parish is wholly within the South Devon AONB and the proposed planning policies for this rural area is to only provide housing which meets essential local needs. There is also strong support in the local community to introduce a policy in the neighbourhood plan that any new housing , other than one to one replacement housing, will be restricted to main residence housing only which will severely restrict the number of new homes available to those wishing to use them as second homes or holiday homes. We understand that other parishes in the South Hams are also interested in including such a policy as part of their neighbourhood plans.

We support the statement at para 3.24 that the Sustainable Villages housing allowance for the Thriving Towns and Villages Policy should be delivered primarily through neighbourhood plans. The amount of new homes to be provided will need to be reviewed regularly having regard to the fact that the plan is for the period 2014 to 2034. The Draft Local Plan (Fig 3.3) shows dwellings completed, under construction and outstanding commitments at April 2016 and is therefore already one year out of date.

**Policy SPT5; Provision of retail development (page 27)**

We support the policy for allowing small scale convenience shops in locations where there is no other such shop within a reasonable walking distance of a residential area.

**Policy SPT6: Spatial provision of retail and main town centre uses (page 29)**

We support the sequential hierarchy approach for the provision of retail and main town uses with the centres of larger villages having primarily top-up food shopping and local services.

**Policy SPT8: Strategic connectivity (page 36)**

We support the need to build upon Plymouth and South West Devon’s digital connectivity. However this needs to be extended to serve rural communities which do not currently have High Speed Broadband. This would be particularly helpful for the rural communities, for local businesses and people working from home. We would point out that most of Bigbury Parish including the villages of St Ann’s, Bigbury Village and Bigbury on Sea do not currently have this facility.

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**Policy SPT9: Strategic principles for transport planning and strategy (page 43)**

We support the general principles of this policy but would emphasise the need for much better public transport facilities to support the rural areas.

The lack of regular bus services serving the parish of Bigbury is the main reason why young people, people with families and older people who are unable to drive do not wish to live in this area or who are wishing to move away from the parish in order to live in more sustainable locations. Provision of more sustainable transport choices would greatly assist in being able to provide a more balanced demographic profile, to provide more sustainable settlements and to support local services and local businesses.

**Policy SPT11: Strategic approach to the natural environment (page 45)**

We support the need for Areas of Outstanding Natural Beauty to be given the highest status of protection in relation to landscape and scenic beauty and to avoid major development in these areas. We do however consider that it would be helpful for there to be a definition for major residential development in terms of either the number of dwellings to be provided or the area of the development site. At the moment the question of whether development can be regarded a major development is extremely subjective and often misinterpreted.

**5. Strategy for Thriving Towns and Villages**

**Strategy Objective SO6: Delivering a prosperous and sustainable South West Devon (page 168)**

We support this objective particularly in relation to enabling a bottom-up planning process through the delivery of neighbourhood plans.

**Policy TTV1: Prioritising growth through a hierarchy of sustainable settlements (page 168)**

We support the principle of having a hierarchy of sustainable settlements but consider that Bigbury Village has been wrongly identified as a sustainable village (para 5.10).

We have carried out our own assessments of the sustainability of both St Ann’s Chapel and Bigbury Village using the Council’s methodology (copies of these are attached).

For St Ann’s Chapel we found the total score should be 27.0 out of 47 instead of 28.5 as shown in the Council’s assessment. We enclose a copy of this assessment showing both that provided by South Hams District Council (SHDC) and that carried out by the Bigbury Neighbourhood Plan Steering Group (BNPSG). There are no public car parks in St Ann’s Chapel. There is a car park at the rear of the local shop owned by the proprietors and for the use of customers only. There is also a small car park for the Memorial Hall for users of events at the Memorial Hall only. We have therefore given this a score of half rather than one. St Lawrence Church is in Bigbury Village not St Ann’s Chapel and is over 1km from this village. However, on the basis of the methodology used by the Council we accept that St Ann’s Chapel would be classified as a Sustainable Village.

The BNPSG results for Bigbury Village show an overall score of 10.5 as opposed to 20.0 as assessed by SHDC. This is well below the total of 15 to enable this village to be regarded as a Sustainable Village. The reasons for this difference are as follows:

* There is no village shop. The village shop closed about 5 years ago and is now used as a beauty salon.
* Bigbury Village does not have high speed Broadband. The information shown on the Offcom website is wrong. It had been intended to provide a fibre connection to serve Bigbury Village but these works have not been carried out and it now seems unlikely that this will be done.
* There is no community building/civic centre in Bigbury Village.

All of the above carry the high weighting of 3 points.

* There is no regular bus service but there is one bus a week to Plymouth and back. We have given a half score for this in accordance with the methodology used by SHDC.

We are surprised that having a regular bus service or even a railway station is not given a higher rating. A bus service is only given a weighting of 1 point and railway station 2 points. In our opinion access to good public transport is extremely important for the sustainability of villages and should be given far more weight. It is ironic that having high speed Broadband (current rating of 3) is considered to be more important. We also consider that a bus once a week to Plymouth and back is a poor substitute for a regular bus service and has very little impact on the sustainability of rural villages. It cannot be used for access to education facilities, for shopping (other than once a week), for access to employment, visits to health centres, libraries, sporting facilities, restaurants or other services. Lack of a regular bus service is one of the main reasons that the parish has very few families or young adults. A recent survey has shown that in the parish of Bigbury 44.12% of the population are aged 60 or above.

**Policy TTV2: Delivering sustainable development in the Thriving Towns and Villages Policy Area (page 171)**

We support this policy.

**Strategic Objective SO9: Maintaining the viability of the many sustainable villages in the rural area (page 224)**

We support this strategic objective.

**Policy TTV30: Empowering local residents to create strong and sustainable communities**

We support the policy for neighbourhood plans as a means for identifying local development needs in the sustainable villages. We also consider that it is important that any new development in these areas is that which is essential to meet the local needs of local communities. We consider that for sustainable villages (not including Bigbury Village as referred to in our representation on Policy TTV1) new housing of around 10 dwellings would normally be appropriate but note that for sustainable villages in the AONB (including St Ann’s Chapel) it might be more appropriate to have small scale developments of below 10 dwellings. This limit on the overall size of development may however cause problems for the delivery of affordable housing and we comment on this under our representations to Policy DEV8.

We are also concerned about the possibility of applications for development being allowed in advance of the adoption of Neighbourhood Plans e.g. an outline application for 8 dwellings at St Ann’s Chapel (Ref: 4097/16/OPA). This is a development which the Parish Council, the Neighbourhood Plan Steering Group and many local residents consider should be refused on a number of grounds including increased traffic, highway safety, pedestrian access and harm to the environment. There are better sites available for development in St Ann’s Chapel which would not result in so much harm. Hopefully the views of the Parish Council and local residents will be taken into account when considering this application.

**Policy TTV31: Development in the Countryside (page 227)**

It is unclear whether this policy will relate to development within existing settlements in the countryside which have not been identified as Sustainable Villages.

Criterion (1) refers to development adjoining or very near to an existing settlement and as such does not appear to relate to development which is within an existing settlement. We consider that a separate policy is required for developments within settlements such as Bigbury Village or Bigbury on Sea which are not Sustainable Villages. We also consider that the policy should be worded to restrict any new development which is outside village development boundaries.

Para 5.163 refers to the possibility of some limited organic growth of small rural settlements. Again it is not clear whether this would enable growth which would be outside the confines of village development boundaries. We consider that some limited growth within village development boundaries might be possible.

Criterion 2(iv) – We strongly object to this criterion which will encourage developers to apply for development on isolated sites using outstanding design or innovative sustainability reasons to justify this. This was previously a Government policy set out in RPG3 but was not transposed into the NPPF and very few developments have been allowed on this basis. We consider this criterion is not helpful and will give false encouragement to developers to seek permission for development in locations which are in unsustainable locations and possibly harmful to the landscape.

**Policy TTV32: Residential extensions and replacement dwellings in the countryside (page 229)**

As in Policy TTV31 it is unclear whether this policy will relate to development within existing settlements which have not been identified as Sustainable Villages. Within village development boundaries it might be possible on some sites to replace an existing dwelling with two or more houses depending on the size of the plot and need to ensure adequate garden sizes and development which does not appear overly cramped or out of scale with the size of neighbouring properties. It will also be important to ensure that the amenities of neighbouring properties are not unduly harmed.

**Strategic Objective SO11: Delivering high quality development (page 230)**

We support this objective.

**Policy DEV1: Protecting health and amenity (page 231)**

We support this policy.

**Policy DEV2: Air, water, soil, noise and land (page 232)**

We support this policy.

**Policy DEV3: Sport and recreation (page 233)**

We support this policy.

**Policy DEV4: Playing pitches (page 234)**

We support this policy.

**Policy DEV5: Community food growing and allotments (page 235)**

We note that the provision of new allotments does depend on whether there is a deficiency of provision having regard to the overall demand for and supply of such facilities in the locality. In the Bigbury Parish Neighbourhood Plan Questionnaire we did ask the local community whether they considered that there was a need for allotments and if so would they wish to rent an allotment if made available. Whilst there was some support for the provision of allotments nobody answering the questionnaire, which was completed by 40% of the parishioners, stated that they would wish to rent an allotment if made available. On the information currently available it would seem that there is not a particular need for allotments in this parish.

**Policy DEV8: Meeting local housing need in the Thriving Towns and Villages Policy Area**

We object to the wording of provisions 2 and 4 of this policy.

We consider that in rural areas housing developments of 6 to 10 dwellings should provide affordable housing on site to meet local housing needs. We also consider that 30% provision may not be sufficient if the developments are truly to serve local needs .There is also no point in asking for an off-site commuted sum as this money is unlikely to be used to provide affordable housing within the local area having regard to the limited number of sites available.

Developments in AONBs are likely to be small in size (less than 10 dwellings) and without a policy requiring some on-site affordable housing the local housing needs of these areas are unlikely to be met.

Although we agree that for High Value Areas, proposals for large, single dwellings with a gross floorspace exceeding 200 sq m could be required to pay a commuted sum to deliver affordable housing it is uncertain how this would be used to deliver affordable housing in a location that would meet local housing needs.

**Policy DEV9: Meeting housing needs in the Plan Area (page 238)**

We support this policy.

**Policy DEV10: Delivering high quality housing (page 240)**

We support this policy.

**Policy DEV13: Consideration of sites for Travellers and Travelling Showpeople (page 245)**

We support this policy.

**Policy DEV14: Maintaining a flexible mix of employment sites (page 246)**

We support this policy.

**Policy DEV15: Supporting the rural economy (page 248)**

We support this policy.

**Policy DEV18: Protection local shops and services (page 252)**

We support this policy particularly in relation to protection of local convenience shops, post offices, public houses, cafes and community facilities where this would result in significant harm to the level of service locally.

**Policy DEV20: Place shaping and the quality of the built environment (page 255)**

We support this policy.

**Policy DEV21: Conserving the historic environment (page 257)**

We support this policy.

**Policy DEV22: Development affecting the historic environment (page 258)**

We support this policy.

**Policy DEV 24: Landscape character (page 260)**

We support this policy.

**Policy DEV25: Undeveloped coast (page 261)**

We support this policy but the formatting needs to be changed. Criteria 2, 3, 4 and 5 should be the necessary criteria for allowing development in the undeveloped coast, currently wrongly shown as a separate criterion (criterion 1). All of these 4 criteria need to be met.

**Policy DEV27: Nationally protected landscapes (page 263)**

We support this policy but consider that development should also accord with the policies and guidance of the South Devon Area of Outstanding Natural Beauty (AONB) Management Plan and the emerging South Devon AONB Planning Guidance.

**Policy DEV28: Protecting and enhancing biodiversity and geological conservation (page 264)**

We support this policy.

**Policy DEV29: Green and play spaces (page 266)**

We support this policy.

**Policy DEV30: Trees, woodlands and hedgerows (page 267)**

We support this policy.

**Policy DEV31: Specific provisions relating to transport (page 269)**

We support this policy.

**Policy DEV32: Meeting the community infrastructure needs of new homes (page 270)**

We support this policy.

**Policy DEV33: Waste management (page 271)**

We support this policy.

**Policy DEV34: Delivering low carbon development (page 273)**

We support this policy.

**Policy DEV35: Renewable and low carbon energy (page 275)**

We consider that the policy should state that no commercial renewable energy developments will be allowed within the South Devon AONB, the Undeveloped Coast or the Heritage Coastal Area.

**Policy DEV38: Coastal Change Management Areas (page 279)**

We support this policy.