

Dartmouth Neighbourhood Plan

Schedule of Responses to Regulation 16 Consultation

Dartmouth Neighbourhood Plan was submitted to South Hams District Council on 18th July. The Council consulted on the submitted plan for a six week period between 25th February 2022 and 8th April 2022 in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations. Set out below is a summarised schedule of the representations on the Frogmore and Sherford Neighbourhood Plan made in response to consultation at Regulation 16.

Dartmouth Trust:

Regarding the proposed designation of Local Green Spaces in relation to land at Jawbones Hill (LGS6) and Crosby Meadow LGS15 (both owned by The Dartmouth Trust) Trustees remain unable to give their support to the proposal as the Trust's primary purpose as set out in its Charity's Scheme is to generate the best income obtainable from its investments and to distribute the net proceeds to its 3 named beneficiaries who themselves perform charitable acts for the town with the money they receive.

Devon & Cornwall Police:

I have no comment to make to the neighbourhood plan but look forward to being involved with regard to any future proposal/developments in order to provide appropriate and relevant advice and recommendations.

Dittisham Parish Council:

I am writing on behalf of Dittisham Parish Council to advise that DPC SUPPORTS the proposed Dartmouth Neighbourhood Plan.

Environment Agency:

We are pleased with how our comments on the previous version of the plan have been incorporated into the submission version and consider that it adequately addresses the environmental matters within our remit.

We support the neighbourhood plan's overarching vision. In particular we are supportive of the aim for new development to conserve green space, encourage biodiversity and protect against coastal erosion and flooding. However, we recommend that adaptation to climate change is given greater emphasis in the vision.

We support the inclusion of themes and objectives relating to the green environment, and note that the submission version now includes an objective to safeguard water quality in line with our previous recommendation. This objective would have benefits for the environment, as well as the community and attracting economic investment.

We welcome the range of environmental policies set out in the plan. In particular, we are supportive of policies GE2 Safeguarding Biodiversity and GI, GE5 Maintaining the Character

and Environmental Quality of the River, GE7 Mitigation for climate change and GE11 Prevention of Flooding. We are pleased to note that the wording of policy GE11 has changed from the previous consultation version and now has greater emphasis on steering development away from flood risk areas. We consider that avoiding developing in the floodplain is a robust way of securing the Plan's objective of preventing flooding.

We also welcome the changes that have been made to policy TE5 Brownfield first following our previous recommendations. It is now clear that the sites listed in the End 2 appendix are not allocations and the policy also sets out the flood risk requirements for new developments, including the need to satisfy the Sequential and Exception Tests. We particularly support the inclusion of the wording: As a minimum, as well as being safe from flooding over its lifetime, development on such sites must also contribute to reducing the overall flood risk to the town.

We also support the changes to policy HW1 regarding the former hospital site, which now references the flood risk requirements for the re-use of the site.

Flood Risk Management:

The plan could make reference to Sustainable Drainage Systems, particularly if the Town Council would like SuDS designed to be multifunctional. SuDS could be designed to resemble or enhance local heritage assets. For example, attenuation ponds could incorporate artwork or statues for the Naval College, and perhaps the headwalls could be clad with similar stone to Bayard's Fort.

The Town Council may desire new developments to reuse rainwater. They may also desire the use of green roofs and living walls within new developments.

The Town Council should be made aware that works within Ordinary Watercourses require Land Drainage Consent from Devon County Council's Flood and Coastal Risk Management Team. This could include hydropower systems (as referred to within Policy DNP GE 9, Encouraging renewable energy).

Historic England:

Our comments at the Regulation 14 stage seem to have been addressed and incorporated into the final plan, so I can confirm that there are no further issues associated with the plan upon which we wish to comment.

We therefore take this opportunity to commend the community for their commitment and the hard work required to reach this stage in the neighbourhood plan process. We wish the Neighbourhood Plan Group well with the remaining stages required in the plan making process.

Kingswear Parish Council:

At their meeting on 09.03.22, Kingswear Parish Council voted unanimously to support the Dartmouth Neighbourhood Plan and have no issues with the content of the Regulation 15 Version of the plan.

Natural England:

Natural England does not, however, have any specific comments to make on the submission draft of the Dartmouth Neighbourhood Plan.

South Hams District Council:

Policy DNP GE 1 Impact on the South Devon Area of Outstanding Natural Beauty (AONB) Undeveloped Coast and Heritage Coast: The following comments made in the Council's Regulation 14 comments still apply:-

- 1) The Policy repeats requirements set out in the JLP and NPPF. It need not do this.
- 2) The policy applies to development of "size and scale" for which no definition is given. The Policy should be clearer in its intent and application.

Criterion a) and c) The LPA's Local Validation checklist identifies information that must be submitted with planning applications. No justification is given for the additional information required by this Policy.

Criterion d) Suggest this applies only where appropriate.

Policy DNP GE 2 Safeguarding the biodiversity and Green Infrastructure throughout the Parish:

As with Policy DNP GE 1, The policy applies to development of "size and scale" for which no definition is given. The Policy should be clearer in its intent and application. Criteria a) and b): The LPA's Local Validation checklist identifies information that must be submitted with planning applications. No justification is given for the additional information required by this Policy.

Criterion c) Suggest this applies only where appropriate.

Criteria f) this criteria lacks clarity. Suggest "Minimise paved areas.....".

Policy DNP GE 3 Local Green Spaces: The Council, as landowner of the following sites maintains its objection as set out below:- LGS 14 – Manor Gardens The Council would prefer that options for the future use of this area, which might best serve the Council and the community, be unconstrained by a LGS designation. Whilst the uses proposed are recreational in nature it is considered such a designation could undermine the very real opportunities to increase community provision.

LGS 13-Norton Field The Council would prefer options for the future use of this area, which might best serve the Council and the community, be unconstrained by a LGS designation. Whilst the uses proposed are recreational in nature it is considered such a designation could undermine the very real opportunities to increase community provision. LGS 17 – Bowling Green There has been a dialogue with the Bowling Club for some time about the relocation of the club to Norton Playing Fields to provide a modern, purpose built Bowls facility with access to parking. Such a proposal can only be realised by redevelopment of the existing Bowling Green site to generate income that would support the relocation proposal. LGS designation would prevent such a proposal which is intended to benefit the Bowling Club and enable the provision of much needed local housing. Whilst the Council does not currently have specific development plans in place for the Bowling Club site, the Council are keen to ensure options for this site remain open The Council is clearly mindful of the housing needs in Dartmouth and would promote a scheme aimed at meeting local needs whilst ensuring the needs of the Bowling Club were met elsewhere Furthermore, the Council would contend that the Bowling Green site does not fall into the category of Local Green Space as defined by

the NPPF– the bowling surface is an artificial carpet, and not grass. Whilst a recreational facility, the facility itself does not meet the spirit nor letter of NPPF Policy. In terms of LGS 16 Jawbones Beacon Park the Council are concerned the extent of this designation, as agreed with the Dartmouth NPG, is not reflected on Map 8. Appendix 1, attached below to this document, illustrates what the Council consider to be the agreed boundary of this designation.

Policy DNP GE4 Allotments: The designation of each of these allotment areas as LGS could hamper or prevent future improvements to these facilities.

Policy DNP GE5 Maintaining the character and the environmental quality of the river: Criterion c: The documentation referred to are material considerations so need not be mentioned in the Policy. Suggest they are referenced in the justification.

Policy DNP GE 6 Locally Important Views: No comment other than many views have been identified. It may be worthwhile considering a reduction identifying key views only. The identification of so many views could dilute the intent of this Policy.

Policy DNP GE7 Actions to mitigate against climate change and carbon reduction: Suggest this Policy is more clearly focussed. Is it appropriate that it applies to all development. First paragraph last sentence would better read: “Where appropriate all new development are encouraged to:-“ Criterion a) is difficult to understand and it is suggested would difficult to apply and enforce

Policy DNP GE 8 Promotion of tree planting: Second paragraph, third sentence: The Local Validation List determines information that accompanies a planning application this need not be repeated here.

Policy DNP GE 9, Encouraging renewable energy: First paragraph: Suggest “where supported by the community” is removed since “local support” is not a prerequisite based upon a planning consideration. Penultimate paragraph, second sentence: The Local List will determine the information that should accompany a planning application no need to repeat here.

Policy DNP GE 10 Prevention of light pollution: This Policy is overcomplicated and, in some instances seeks to control matters which lie outside planning control or would be difficult to enforce.

Policy DNP GE 11 Prevention of Flooding: No comment. Map 10 Flood Risk Map: As indicated in the Council’s Reg 14 comments the EA Flood Risk Maps are regularly updated.

As such this Map could be superseded during the course of the NP. Suggest it is removed and a link to the EA Flood Risk Maps is provided in the justification to the Policy.

Policy DNP GE12. Settlement Boundary and the avoidance of coalescence: Final Paragraph: whilst the justification mentions the issue of potential coalescence it does not specify geographically where this is an issue. It would be helpful if this were addressed and the policy and justification wording amended accordingly.

Policy DNP EC 1 Tourism related employment and retention of hotels: Whilst supporting the general thrust of this Policy the Council are concerned that the wording lacks clarity and in some instances appears counterproductive to its aim as follows:- Criterion a) This appears to give licence to “acceptable” changes of use. Criterion b) If the use is proven unviable then the loss of accommodation and jobs may inevitably result. This criteria appears to prevent a change of use in these circumstances even if unviability is proven.

Criterion c) The lack of demand for hotel accommodation will be apparent, at least in part, from the viability assessment so need not be stated here. Criterion d) This criterion appears to counter the principle this Policy is seeking to set. Suggest a final paragraph sets out the parameters for the viability assessment and the criteria are dispensed with. Suggest this clearly identifies the use for which the property is marketed based on criteria c).

Policy DNP EC3 Additional employment land and safeguarding of existing employment uses: a) This is unclear in its intent and undermines JLP Policy DEV14. The first sentence of Policy DNP EC3 opens by stating that, ‘Retention of existing employment sites is supported’, but weakens this by stating ‘unless other suitable sites are found that are more compatible with...’ This introduces ambiguity into the policy position, and opens the scope for a ‘test (‘more compatible’) that would be very difficult to assess. The final sentence of this clause then appears to rule out this scope by stating, ‘Changes of use resulting in the loss of employment land to the Plan area will not be supported.’ b) Second sentence: This is open ended and perhaps misplaced in this section of the policy. Suggest it is dealt with separately with identified criteria to test the suitability of the site for storage use. c) It is assumed this links to b) and applies to “Upgrading, intensification and enhancement of existing employment sites with poor environments”. It is considered the requirements sought are unduly onerous. d) This policy clarity what is meant by “other suitable sites” It is suggested that JLP Policy DEV14, linked to Paragraph 5.9 to 5.13 of the JLP Supplementary Document 2020, set out the exceptional circumstances where change of use may be acceptable and the requirements to prove such a case. It is considered the wording and intent of this Policy undermine the exceptional circumstances JLP Policy DEV14 seeks to apply.

Policy DNP EC4 Support for the primary and secondary shopping area of Dartmouth: Second Paragraph, second sentence: The provision of adequate car parking is likely not possible in a town centre location which could lead to upper floors remaining vacant. Second Paragraph, third sentence: The term “ancillary use” lacks the clarity required by the decision maker.

Policy DNP EC 6 Employment uses in the countryside: This Policy largely repeats JLP Policy DEV 15. Final paragraph: This paragraph adds requirement that exceed those identified in JLP Policy DEV 15. No justification is given for these additional requirements as such this paragraph should be removed.

Policy DNP ST1: Footpaths and cycleways: Whilst the Councils supports the provision of footpaths and cycleways there are concerns regarding certain aspects of this Policy:- 1.) The control, upkeep and use of the existing and future network of footpaths and bridleways is covered by legislation separate from that relating to planning. Criteria b) Since this is a proposal, the new route(s) proposed should be shown on the Proposals Map. Suggest that routes that are identified are made clearer than they appear on Map 13. Have the owners, potentially affected by these proposals, been individually and formally consulted. The Statement of Consultation records (Para 4.2) that all affected landowners were consulted the results of that consultation, in relation to this proposal, is not readily apparent, Furthermore there is no clear indication of how the implementation of this criteria can be linked to development proposals that may be expected to contribute towards its implementation.

Policy DNP ST2: Car Parking and Coach Parking: a) There are concerns (registered by the Council in its response to the Regulation 14 consultation) that the DCC Transport Study is somewhat dated to introduce as a material consideration. Attention was drawn by the Council to the fact that the Transport Study included in Appendix Q is marked "draft". Furthermore, the second sentence mentions an "emerging Transport Study" which is referred to in the final sentence of the justification, yet no explanation of this Study, nor its status, is provided. b) is very onerous and could stifle supportable development (see comments on Policy DNP EC4). c) lacks clarity: suggest it is better put that such proposals are accompanied by adequate on site parking provision. d) there is no need to repeat JLP SPD requirements. f) the NP provides no evidence that the management implications have been discussed with the Council nor other providers (see Councils' Regulation 14 comments on this Policy). Second sentence; Should this be a separate criteria. Furthermore, should the final part of this sentence read..."there are measures in place to enforce their use." j) The Council requested (in its Regulation 14 consultation response) that owners of other land identified on Map14 be individually and formally consulted. The Statement of Consultation records (Para 4.2) that all landowners were consulted the result of that consultation, in relation to this proposal, is not readily apparent.

Policy DNP TE2: Design Quality throughout the Parish: Criteria c) and f): As indicated in the Council's Regulation 14 comments there is no need to repeat JLP Policy Criteria d) the requirement for "natural" materials is unduly restrictive. Criterion e) Suggest "Where appropriate" opens this criteria. Criterion f) This simply repeats JLP Policy. Criteria i): last sentence: Suggest replacement of lost trees, hedges and of any wall is required only where appropriate. Criteria k) is unnecessary since PROW legislation covers this issue. Criterion m) This would be difficult to require or enforce. Criteria n) This is not always possible. DM processes should ensure protection of amenity etc during and following implementation

Policy DNP TE3 Safeguarding Designated and Non Designated heritage assets and the conservation area of Dartmouth: This Policy largely repeats National and Local Policy. Criterion b) reference to the various documents which supports the content of this Policy is better placed in the justification of this Policy. Criteria c) This is applicable to the

Conservation Area. Suggest it will not be applicable in all instances “in the vicinity of Designated and Non Designated Assets” as required in the opening sentence of this Policy. Criterion d) The weight afforded to the consideration of Designated Assets, differs from that afforded to Non Designated Assets. The Policy does not distinguish between the two.

Policy DNP TE 4; Respect, protection and enhancement of civic spaces: The Council is content with this Policy as it relates to property owned by the Council (CS1, CS10 and CS11). The Council requested (in its Regulation 14 consultation response) that owners of other land identified in this Policy be individually and formally consulted. The Statement of Consultation records (Para 4.2) that all landowners were consulted the result of that consultation, in relation to these proposals, is not readily apparent

Policy. DNP TE5 Brownfield first: First Paragraph, opening three sentences: It is unclear how a developer would be able to demonstrate that there are no suitable brownfield sites available before proposing development on greenfield land as a part of a planning application as suggested within the policy. General comments on Policy DNP TE5 As commented previously, the principle of support for brownfield development accords with Policy SPT1 of the JLP. However the wording of this policy is convoluted, lacks clarity and appears at odds with the NPPF, the JLP and Policy DNP EC3. In particular, the Policy refers to named viable and active employment sites, none of which have been subject of formal site assessment, by reference to Appendices B14 and B36. While the Policy does refer to avoidance of the loss of employment uses it details local employment types and identifies specific sites that theoretically could, given the terms of the Policy, become available for redevelopment. As such, the Policy appears to do nothing more than promote the redevelopment of these sites. The wording has the potential to encourage speculative applications and to encourage landowners/purchasers to consider more profitable land uses at these locations thus undermining the existing uses, many of which enhance the sustainability and mixed use nature of Dartmouth. This approach is not in accordance with the strategy of the JLP which seeks to support business growth and employment opportunities (SPT1, DEV14) and prioritises our main towns as a location for employment and services (TTV1). Furthermore the promotion, as it appears, of the loss of employment sites to residential use does not accord with the general principals, set by the NPPF, which supports the retention of sustainable uses.

Policy DNP H1 - Market Housing: First paragraph: This repeats what is stated in DNP GE 12 and JLP Policy.

Criterion c) The HNA states suggests a higher standard, than the JLP, would be appropriate for Dartmouth “where viable”. (AECOM HNA 2021 para 76). No evidence has been presented that viability testing has taken place. Suggest the Policy wording is altered to “encourage” rather than “should”.

Policy DNP H2- Exception Sites outside the settlement boundary: Criterion b) it is unclear what is being required over and above that required by Criterion a). Criterion f) JLP Policy TTV 27 is clear as to the requirements that apply to exception sites. This criteria appears to extend those requirements without justification.

Policy DNP H3 Affordable Housing: General Comments on Policy DNP H3 South Hams District Council declared a housing crisis on 24 September 2021. In part this was in recognition of the challenges for young people to afford to live locally, either in rented accommodation or through affordable home ownership. We support the DNP Neighbourhood Planning Group's production of a local Housing Need Survey which will support developers to meet specific identified needs during the lifetime of the Neighbourhood Plan once made. The wording of policy DNP H3 used within the neighbourhood plan to seek boost local affordability is however potentially inconsistent with the strategic policies of the Joint Local Plan and in some places misleading when considering national guidance. Policy DNP H3 makes reference to support for affordable homes within settlements and exception sites within a combined list of criteria. This includes a priority for First Homes as an affordable home ownership product. The Dartmouth Neighbourhood Planning Group should be aware that First Home Exception Sites are not eligible within Rural Designated Areas or within Areas of Outstanding Natural Beauty (AONB). This was made clear in the written ministerial statement (24 May 2021) which is afforded planning weight within the National Planning Policy Framework (paragraph 6). This would mean such sites would not be appropriate on land within Dartmouth that is so designated. Strategic Policy SPT3 of the adopted JLP sets out the overall policy target for affordable housing delivery within the plan area. Policy DEV8 sets out the percentage of affordable Homes expected to be delivered on and offsite in order to achieve this total within the Thriving Towns and Villages Policy Area. The JLP Supplementary Planning Document (Para 4.79) sets out the preferred split of affordable Homes to be 65% as social rent and 35% affordable home ownership products. The policy thresholds for affordable housing were informed by an assessment of housing need at the strategic level in the Strategic Housing Market Assessment and through viability testing to ensure that such thresholds would not impact the overall deliverability of new proposals for housing including development allocations in Dartmouth. The evidence assumptions used in these documents were subject to examination at a Public Inquiry in respect of the JLP. The proposed policy for DNP H3 (criteria d) changes the assumptions used in that it seeks to prioritise First Homes as the preferred form of home ownership model and provides evidence in a Housing Need Survey (AECOM, 2021) to suggest such Homes be sold at a 50% discount on market value based on levels of local housing need without viability evidence. The Housing Needs Survey effectively highlights the concerning lack of housing affordability, however in changing viability assumptions without update or reference to existing viability work there is a level of risk which the Dartmouth Neighbourhood Planning Group should be aware of. The Written Ministerial Statement states that policy compliance including First Homes will be judged at the equivalent total value as locally adopted affordable housing policies (in this case JLP Policy DEV8) with at least 25% of those affordable homes as First Homes. No viability evidence has been undertaken to support the AECOM study to show that applying 50% discount to 25% of affordable Homes will not lead to a reduction in the overall proportion of affordable Homes at any given residential site and which would now be considered policy compliant. We do not know from the evidence presented whether this policy approach will lead a reduction in the number of both homes for Social Rent and the scale of impact on all affordable housing delivery in the Neighbourhood Plan Area should the plan be made. For the above reason, in the absence of viability testing to prove otherwise, we cannot support the inclusion of First Homes in this policy. The approach to discounted First Homes has the potential to reduce affordable housing delivery and conflict with strategic policy SPT3 of the Joint Local Plan which seeks to deliver a minimum of 2,050 affordable Homes up to 2034. It is also unclear whether the policy would significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

Specific Issues relating to DNP H3 criteria

Criterion a: See General comments above. Additionally, whilst the housing waiting lists and Devon Homes data base provide important information for assessing local housing need, the starting point should be the Strategic Housing Market Assessment linked to an up-to-date local housing needs assessment. Furthermore, the JLP sets out the percentage that should accompany development proposals. This criteria seeks to apply a new criteria for which no clear explanation or justification is given. Criterion b): This will apply as a matter of course and need not be stated. Criteria c): Same comment as for Criteria a) apart from final sentence. Criterion d): See General Comments above. Criterion e) The definition of Key workers changes over time, it is not appropriate that the Neighbourhood Plan identifies specific key worker categories this is best achieved by a review of the Local Allocations Policy. Criterion f) This is not entirely correct. Parts of Dartmouth outside of the AONB are classed as main town and stair casing is allowed to 100% as per Homes England grant funding requirements. Last sentence: This appears to preclude schemes that are wholly instigated by the private sector as such should be removed.

Policy DNP H5 Specialist Accommodation for Older People, residential care nursing homes and loss of existing residential care: a) Remove reference to the HNA since this a background paper. Circumstances will change, the HNA provides useful evidence but is a snapshot in time. The evidence that supports the specialist provision sought is better placed in the justification. b) First sentence: It is unreasonable to require replacement facilities are provided should the existing use prove unviable. b) Last sentence: It is unreasonable to require that the specific uses identified replace a use that proves unviable. It is suggested that b) simply requires that the changes of use specified are subject of a marketing test prior to change of use being considered. c) First sentence: Whilst understanding the desire to locate such accommodation centrally in the town this restriction could inhibit much needed provision on elsewhere and on exception sites. d) See comments on DNP H1c). In essence, no justification (nor viability assessment) has been presented that supports exceeding the requirements set by JLP Policy Dev9. Suggest the statement could “encourage” rather than insist upon the exceedance of standards.

Policy DNP HW 1 Re-use of the former hospital site and health centre Zion Place: The Council’s comments at Regulation 14 were as follows:- “There appears to be no planning justification for the requirement to retain a portion of the site for “ health and wellbeing facilities”. There may be covenants which apply but these will be separate and distinct from what the planning system can require. Have any discussions taken place with the Health Board? Is their evidence from that quarter to support the requirements of this Policy? The requirement to produce a Development Brief appears onerous and requires full justification.” The Policy has been amended and expanded in the Regulation 15 Version. The Council’s concerns however remain that the Policy is over prescriptive and unduly onerous in its current form. It is understood that the Dartmouth NPG have had extensive discussions with Torbay and South Devon NHS Foundation Trust (TSDFT) regarding the future of the sites identified in this Policy. As yet, however, no formal response to the content of the Neighbourhood Plan has been received from TSDFT. The Council, therefore, maintains its concerns regarding the content of this Policy.

Policy DNP HW 2, Community Facilities: a) The community facilities mentioned in the Policy at paragraphs 6.6.4-10 should be listed in the Policy and identified on a Proposals Map.

Criterion d) Last sentence suggest should read “Where appropriate development should include.....” Criterion f) The Council requested (in its Regulation 14 consultation response) that owners of the land identified in this criterion be individually and formally consulted. The Statement of Consultation records (Para 4.2) that all landowners were consulted the result of that consultation, in relation to this proposal, is not readily apparent.

HW4 POLICY DNP HW4 Education Facilities: At Regulation 14 the Council raised the following questions:- Criteria b) Has this criteria been discussed with the Education Authority/Providers? Criteria c) Have the owners/occupiers of this site been individually consulted? The Statement of Consultation records (Para 4.2) that all landowners were consulted the result of that consultation, in relation to this these proposals, is not readily apparent. The Council’s is concerned that this Policy is over prescriptive and unduly onerous in its current form

D Twigg:

I support this version of the Plan, and commend the huge amount of work which has been expended on it.

J Wilson:

1. The draft Plan sets out a comprehensive template for the protection and conservation of the Town’s built and natural environment. For that, it must be applauded.

However, another key purpose of the land use planning system is to make provision for future development needs, where there is an established existing need and/or a forecast future need. In the Dartmouth context " development" really means land for housing and employment-- homes and jobs.

2. In this context the draft Plan does not go far enough. There are no fresh allocations proposed, though a number of small sites within the defined settlement boundary are identified with possible future uses should they come forward for redevelopment. All other areas of open land are proposed to be designated as Local Green Space. The settlement boundary itself is tightly defined with no enlargements proposed to allow for future needs What, then, might these future needs be?

3. The Joint Local Plan for Plymouth and South West Devon will shortly be rolled forward to 2039. Whilst it is too early to specify what the additional 5-year period -- from 2034 to 2039-- might mean for Dartmouth in terms of future housing needs, it would be prudent for this Plan to have some regard to this aspect and this would almost certainly require a review of the Town's settlement boundary.

4. However, there is an existing need for which the current draft Plan makes I sufficient provision -- that is affordable housing. The current draft Plan does acknowledge this need, and cites and appends the AECOM study commissioned by South Hams District Council as recently as 2021. The following is an extract from the AECOM survey:

1. “The quantity of expected Affordable Housing delivery (primarily from the site at Cotton Farm) will go some way towards meeting the needs of Dartmouth households, although it leaves a shortfall of approximately 40 units – a conservative figure that does

not take into account the tendency of local households to be considered ineligible or not apply, nor the mismatch between the need and supply of affordable rented homes by size. There is therefore a strong case to maximise the delivery of affordable rented housing in Dartmouth wherever possible, as part of Section 106 obligations on allocated sites and any potential community-led or exception schemes.....

27. Generally, the size mix of any new affordable rented housing should be determined with reference to the need or eligibility captured on the HomeChoice register either at an appropriate point in time or using a multi-year average to smooth out any temporary anomalies. This will in turn reflect any imbalances or gaps in the existing stock. What this looks like using the current snapshot from the register is given in section 4.4.1.

28. The HNA calculates that around 25 (rounded) households per year may be interested in affordable home ownership (or 321 for the entirety of the Plan period). This is more than half of the total number of homes on sites adjacent to the NA expected to come forward during the Plan period overall, and represents a clear signal of the scale of the affordability challenge in Dartmouth”

5. The submitted Neighbourhood Plan acknowledges this need and sets out what amounts to the following three-part approach:

a) Provision is made at the **committed developments** at Little Cotton Farm and Noss Marina. Little Cotton has been permitted with a substantially “below policy” allocation of affordable, secured on the basis of viability arguments. Noss Marina will provide a commuted sum towards affordable housing in Dartmouth or Kingswear –but this would require land with residential schemes to come forward to which that contribution could be applied. At present there are no such sites identified, and it is believed that provision would be made in Kingswear, in a separate Plan area, not in Dartmouth.

b) The Neighbourhood Plan does identify **small sites within the settlement boundary** suitable for residential development where an affordable provision would be sought. Policy DNP TE5 Brownfield First preambles as follows: “The brownfield sites considered suitable for long term redevelopment as and when there is landowner support and they become available include existing builders’ merchants, former health facilities, post office, carparks located within the urban area of Dartmouth. Within the lifetime of the Neighbourhood Plan such sites may become redundant or would benefit in the long term from intensification of existing employment sites and more effective use of land or change of use” The reality is that there is no guarantee that all of these sites will come forward and insofar as they do, the level of affordable housing units yielded, in the case of residential development will be modest in the extreme. The only two sites being actively considered at present would be the old Cottage Hospital and the Travis Perkins Builders Merchants. These are small, highly constrained sites and there will be a strong trade off with competing uses in new development.

c) The third avenue for meeting affordable housing need would be “**exception sites**” **outside the current settlement boundary** addressed in Policy DNP H2. This sets out the tests that development proposals on any such sites would have to meet, in addition to that of meeting affordable housing needs. These tests are all perfectly sound. However, when applied to the actual nature of the land immediately outside Dartmouth’s settlement boundary would “on the ground” make it highly unlikely that any exception site would meet these tests. This is because of the high environmental nature of the Plan area, the policies applying and the wish to avoid any coalescence. These are all issues fully recognised in the Neighbourhood Plan as a whole.

6. As a consequence of the above, the Plan’s approach is extremely unlikely to meet the recognised and evidenced level of housing need over the Plan period. There are two alternative ways in which to resolve this:

a) Make a specific allocation **at this stage** of a site adjoining the settlement boundary which will have the ability to resolve the issue and ensure that the Plan fulfils one of its acknowledged purposes, or

b) Amend the approach in the Plan to properly recognise that the level of need cannot be fully met.

7. Clearly, in the interests of proper land use planning and meeting community needs, the first of these options is recommended and I could suggest that the Plan should not be progressed further until on this issue South Hams District Council and Dartmouth Town Council have agreed how this is to be resolved.

8. Finally, it is worth emphasising how politically important the issue of affordable housing provision is within the South West Region. The Local MP has a photo of the Dartmouth waterfront on this relevant part of his website. How unfortunate it would be if the Town failed to play its part.

9. For these reasons I would recommend that the Plan is amended to make specific allocations to certainly meet the already defined affordable housing need and to possibly include a "reserve" site for market housing if required through the JLP roll forward This would almost certainly require a further look at both the settlement boundary and whether all the Local Green Space proposals are merited, in the light of the competing priority for affordable housing provision.

Ministry of Defence:

The Neighbourhood Plan area contains the Britannia Royal Naval College (BRNC) and this makes up a significant proportion of the area of the plan. It is important to highlight that the Defence Estate comprises many areas of land with different uses to support its operational needs and that BRNC is an operational defence site of critical importance to national defence interests.

Paragraph 97 of the National Planning Policy Framework 2021 (NPPF) states;

“97. Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

It is therefore imperative that the Neighbourhood Plan take into account any security and defence implications in the plan making process.

The Neighbourhood plan (Para 2.2 p9) references the closure of BRNC as a 'risk, however, there are no plans for the site to close. BRNC has an enduring infrastructure development plan and MOD are heavily investing in refurbishing and renovating the College over the next few years including upgrading the Sandquay waterfront area so that it is fit for purpose for new training craft.

Public Footpaths

The aspiration for new public footpaths in the area to the North of Sandquay Road, through the Sandquay Woods shown on Map 13 and noted in the text on Page 66 has been the subject of previous correspondence with the Town Council, however, this is not a proposal that MOD can support at the current time due to security considerations.

Security considerations are paramount to BRNC and acknowledged in Paragraph 97 of the NPPF which states that operational sites should not be adversely affected by the impact of other development.

Play Facilities

The exploration of the possibility of providing a LAP/LEAP within the Rock Park area referred to in Paragraph 6.6.8 on Page 96 has also been the subject of previous correspondence with the Town Council. The area of land in question is located within an area of service families accommodation and as such should be considered as part of the MOD Estate whose primary use is to support military capability and as such it is not considered appropriate to be considered for a play area.

R Thorley:

Plan states better signage. Whilst I do believe better signage is needed. Signage can also be a pollutant to views ... inappropriate signage ... unnecessary signage should be minimised. The view should take precedence over the sign at all times. Character street lighting should be preserved ie cast iron lamp posts.. indeed it should be returned where possible. The success of al fresco tables on south embankment should not be allowed to develop in the direction of Spanish style pavilions with soft furnishings!

Tom Clarke:

Theatres Trust has an interest in the Dartmouth Neighbourhood Plan because the town contains a theatre facility, the Flavel Arts Centre. This is an important facility which contributes towards the social and cultural wellbeing of local people and helps support the function and vitality of Dartmouth's town centre.

Policy DNP HW 2, Community Facilities seeks to protect local facilities. However the types of uses described within the supporting text are narrower than within the related NPPF policy (paragraph 93) which includes cultural facilities within this definition. To ensure sufficient protection of all facilities important to local people we recommend minor amendment to ensure the policy also applies to the Flavel Arts Centre as well as community halls and pubs which can support theatre and live performance including meetings and rehearsals.

We otherwise consider the plan to meet the basic conditions.

V Tehel:

I support the plan. I have attended the consultation held and sent comments/ feedback which has been incorporated

N Tehel:

I support our neighbourhood plan as it has been so carefully considered in all aspect