

ITEM 4F - DRAFT RECOMMENDATION TO FULL COUNCIL FROM THE LOCAL PLAN TASK AND FINISH GROUP

To **RECOMMEND** to Full Council that it submits an email response to the South Hams District Council Local Plan Scoping Consultation rather than directly answer all Commonplace questions.

To **RECOMMEND** to Full Council that the following text is submitted as part of the Local Plan Scoping Consultation:

Vision

The Council is concerned that the vision statement emphasises the expansion of existing larger settlements (the 'sustainable towns') despite evidence in the baseline reports that such expansion results in less sustainable behaviour within communities. Creating new settlements with active travel routes to existing ones would be more sustainable.

There is no mention in the vision of:

- Prioritising active travel connections between settlements, which needs to be considered at a county-wide level.
- Farming, horticulture and food production – this should be included as an additional bullet, recognising the importance of protecting and preserving these economies and the associated land management in the South Hams as a predominantly rural area.
- Natural and built environment should be considered separately (penultimate bullet: delete "built".
- The historic environment should be conserved and protected (final bullet).

Engagement Strategy

No additional comments to make.

Settlement Hierarchy

Neither the vision or baseline report makes any reference to Totnes being located between larger urban settlements and the impact that this has on the town in terms of through traffic between Torbay and larger employment centres, particularly Plymouth. NB The Torbay "Travel To Work Area" (TTWA), within which Totnes is included does not reflect the reality that workers commute from Torbay to other centres (Exeter and Plymouth) for work purposes through Totnes.

Bullet 7 – Village sustainability. The Town Council strongly supports an updated assessment of village sustainability as it believes that new development also needs to happen in smaller towns and villages to help support the retention or development of services in those places.

Bullet 8 – suggest replacing the word "should" with "will" to strengthen the sentence: National Landscapes and neighbourhood plan areas ~~will should~~ be considered carefully when reviewing settlement roles and housing requirements.

Bullet 9 – Further growth on the edges of main towns may face physical, environmental, infrastructure and place-making constraints. The Town Council strongly agrees with the

challenges that main towns will face with expansion on their fringes, as set out in more detail in paragraphs 4.2 and 4.3 in the baseline report. This should be given greater consideration in the proposed settlement hierarchy: further developing the main towns will result in the smaller towns becoming less sustainable.

There is no mention in the summary or baseline report of:

- The importance of car parking in contributing to the viability of town centres. This links to the second bullet of the summary, as expensive parking fees and the number of spaces routinely available (i.e. those not used by residents without alternative parking options) can impact on how much a town is visited.
- The creation of new towns, which the Town Council would support where there is the infrastructure in place to support them.

Housing

Bullet 4 – suggest the removal of reference to “despite overall affluence” as this belittles the deprivation problem in the area. Hidden deprivation exists ~~despite overall affluence~~, where income, employment and access-to-services challenges are evident.

Bullet 7 – suggest replacing the word “severe” with “extremely problematic”: Housing affordability remains *extremely problematic* ~~severe~~, with median house prices around 12.25 times workplace earnings in South Hams and 9.89 times earnings in West Devon.

Question HP1: What new policies should we consider to try and improve the affordability of new homes for local people?

- Suitable housing is required to keep younger people in the area – determine the housing type that is needed (e.g. number of bedrooms and size/type of dwelling).
- Consider the need for key-worker housing in the area.
- Developments where Homes England or registered social housing landlords are involved will be encouraged.

Question HP2: How should the Local Plan ensure that new homes meet the needs of local communities? There is a need for rightsizing of houses for the local community. A robust evidence-base for smaller homes is required to ensure that the new NPPF policy “HO7: Meeting the need for homes” is adhered to.

Question HP4: Should eligibility restrictions (for example having a local connection to the area) apply everywhere, or apply differently in different parts of the settlement hierarchy? Everywhere.

Question HP5: Should policies support the delivery of more innovative forms of housing delivery, including Co-housing and Community Land Trusts (CLT)? Yes. Suggest include reference to Intentional community housing too.

Question HP7: Should we explore policies that could retain younger working age people in the area? Yes

The summary or baseline report makes:

- No reference to the levels of deprivation experienced in Bridgetown and Follaton in Totnes (there is reference to Townstal in Dartmouth in the Health and Wellbeing baseline report paragraph 5.28). [Officer Note: However, the DCC 'Deprivation in Devon' webpage suggests that 'Totnes has become less deprived in every neighbourhood.' which was published 20.05.26 and updated 23.07.26.]
- Insufficient emphasis on placemaking and high quality design in the plan to deliver the right houses to suit people's needs and wellbeing. For example, for older people it is a sense of community, accessibility, good building and development design, and a communal green space.

Health and Wellbeing

Bullet 1 – suggest the insertion of “what and” to the second sentence to highlight issues of where dwellings are built in shady or damp areas giving building problems such as damp and mould from the outset: “Decisions about *what and* where development takes place can have a significant impact on people's quality of life, health and access to opportunities.”

Question HW1: How should the new plan secure better health and wellbeing outcomes from new development?

- Focus on design and high-quality placemaking that is informed by indices of health.
- Impose CIL on new developments to ensure that health and wellbeing infrastructure can be delivered.
- Reference to the importance of a healthy high street: providing opportunities for residents to meet socially and access services easily.

Question HW2: Should the local plan explore policy options that can prevent health and wellbeing issues occurring in the future? What would be the most effective policies to achieve this aim?

The Plan should look to encourage developments that build a sense of community and reduce social isolation through good design and placemaking.

It should not permit wood burners to be installed in any new builds to reduce particulate pollution.

There is no mention in the summary of:

- Air Quality and the limitations of what gases and particulates are monitored in the South Hams and where the problem areas are: for example PM2.5 which largely comes from wood burners (rather than traffic pollution) and builds up in residential areas during the winter.

Climate Change

There should be a reordering of the bullets in the summary to acknowledge the importance of the statements made:

New First bullet (currently the last) to include reference to overheating: The local plan should provide a clear framework for climate mitigation and adaptation, supported by further evidence on emissions, renewable energy potential, building performance, *mitigating overheating*, flood risk and coastal change.

New Second bullet (currently the penultimate bullet) to include reference to the threat of wild fires: Adaptation policies will be needed to address overheating, flooding, surface water runoff, drought, *wild fires*, coastal change and the resilience of vulnerable infrastructure and communities.

Question CC1: Should the local plan consider ambitious policies that can reduce the emission impacts of development? Strongly agree. Embodied carbon in construction must also be considered.

Question CC2: Should the local plan consider identifying sites for renewable energy generation and storage? Renewable energy should be installed over car parks, industrial buildings and on the roofs of all new buildings. The use of productive farmland should be discouraged.

Question CC3: Should the next local plan include proactive policies that respond to the direct and indirect effects of climate change, both in terms of mitigation and adaptation? The plan should look at building measures that can be incorporated into new buildings such as renewable energy, air source heat pumps, window size and shading, grey water harvesting.

Question CC5: What climate change and emissions reduction policies would be most effective in the new local plan? No wood burning stoves to be installed in new buildings. Community energy projects should be encouraged. Reject data centres and the water and energy resource implications that such facilities will require.

There is no mention in the summary or baseline report of:

- The building of data centres and the impact on water levels in the area or energy security.

Natural Environment and Landscapes

The Council feels that this section is weak on acknowledging the importance of agriculture and horticulture in the South Hams area.

Question NE1: How should the local plan balance the need to conserve and enhance the natural beauty of designated landscapes (including the South Devon National Landscape and the Tamar Valley National Landscape) with the need to ensure the ongoing sustainability of local communities in these areas? There needs to be a balance of protecting productive agricultural and horticultural land with the central government demands for development.

Questions NE2: Do you agree that the local plan should seek to promote access to, and enjoyment of, South Hams and West Devon's natural environment and scenic landscapes, while protecting ecological sites, habitats and species? Protecting ecological site, habitats and species is of more importance than promoting access or enjoyment.

Question NE3: How should the local plan should seek to positively influence land management practices to improve environmental quality? The plan should promote sustainable farming and horticultural practices on the protected landscape, and the impact of these activities on drainage, river catchment and hedges.

Economy

Bullet 3 – it is good to see an acknowledgement that residents are travelling to larger centres of employment. However, there is no reference to towns that are impacted by this (workers travelling between Torbay and Plymouth cause negative impacts in Totnes).

Bullet 9 - Supporting thriving town centres, local businesses and rural enterprises will be important to maintaining vibrant and sustainable communities. The Town Council strongly supports this statement.

The Totnes Community Economic Plan (CEP) has identified the problems that businesses have in recruiting in Totnes and the lack of training opportunities available of which there is no mention in the summary. The Town Council does not believe that the plan is optimistic enough in its aims and is lacking by not stating the requirement for new economic workplaces (not retail units).

Question EC1: How should the local plan look to diversify the types of jobs available in South Hams and West Devon? The plan needs to prioritise live-work spaces and investment in existing industrial estates, for example updating buildings or expand existing/build new industrial units. The plan could look at how best to utilise vacant shops/retail units to attract occupants.

Question EC3: Do you agree that the local plan should promote a sustainable transition towards a low carbon economy? What would be the most effective policies to achieve this? This would be supported through initiatives such as community energy groups, and the installation of renewable energy on new domestic and industrial building, existing buildings or to cover car parks, but not where high-quality grade A-C agricultural land is being used to achieve these ends.

Question EC4: How should the local plan help reduce the need for people to travel long distances for work? There should be a focus on live-work spaces which provide both domestic accommodation and a business/workshop space. Evidencing the need for the types of dwellings which are required by the local community and its local workforce, for example smaller sized accommodation, and an increase in social housing provision.

Question EC5: How should the local plan protect and enhance the vitality and resilience of our town centres and high streets?

- Investing in high-quality public realm with good accessibility.
- Giving more local control over town centre assets to keep the high street vibrant.
- Supporting events in the town to attract people in to spend.
- Car parking – available spaces and affordable car parking charges are needed to attract employees and visitors into a town. The Council is concerned to see the HELAA (Housing and Economic Land Availability Assessment) suggest car parks as potential sites for building. With a number of car parks in Totnes heavily used by residents, this makes the availability for visitor parking even more challenging, particularly on market days. The removal of car parks would have a highly detrimental effect on the vibrancy of the town centre. However, there could be more

innovative ways of providing car parking (for example below ground or above a building, or as a second level on an existing site).

- Public Transport – connections between towns, the frequency of buses and timetabling to link with trains would benefit employees and shoppers in the town.
- Safe connections to and within towns, with an emphasis on safe active travel provision for these shorter routes.

Historic Environment

Baseline report – this is significantly underdeveloped. It currently lacks reference to evidence to support plan-making, and informative descriptions of the uniqueness and special quality of the historic environment which the JLP area covers.

Reference should continue to be made to the Devon Historic Coastal and Market Towns survey which includes detailed evidence about the historic development of settlements in the South Hams and West Devon, until such time as a replacement/update can be provided.

Section 12 – Implications for local plan-making.

This section underplays both the significance of heritage assets in positively contributing to the public realm, the sense of settlement permanence, and the wellbeing of residents derived from the existence of such a rich legacy of building and settlement form.

12.4 “It is likely that a degree of redevelopment of assets will be required if we are to ensure their protection in the long term” is far too general a statement and needs substantial caveats so that it is not misused by developers in support of proposals which irrevocably damage historic fabric or significance.

Question HE1: As historic buildings continue to change and evolve, they need to contribute to a greener future and be fit for purpose for the people who live in, experience and care for them. With this in mind should the local plan consider policies that reflect this ambition and better align with wider carbon reduction targets and policies? Whilst agreeing that historic assets may need to accommodate some adaptation to ensure they can continue to be positively utilised, significance cannot be diminished in developing such adaptations. Carbon reduction targets need to consider embodied carbon foremost, not just carbon in use (noting that historic assets score very highly in regards to embodied carbon). Policies for historic buildings should not require alignment with general carbon reduction targets.

Question HE2: Would you support utilising heritage buildings and environments for high-quality brownfield development, protecting heritage buildings through their redevelopment and preserving them through finding ongoing uses and retrofitting to reduce carbon footprint? Brownfield sites should be developed around existing historic assets, retaining them and sensitively adapting them to ensure long term viability. The most successful brownfield sites do just this – recognising that these buildings give the site a uniqueness that increases development value. Mention should be made of the need to identify local organisations that can partner early on to assist in developing viable solutions that work for the location/building.

Question HE3: How best can local communities be involved in these brownfield redevelopment schemes to ensure that projects are culturally sensitive, socially inclusive and economically beneficial? Local communities should be involved in the bringing back into use of all historic assets – not just buildings that can be found on brownfield sites. Early engagement with grassroots charities and other organisations (including Town and Parish Councils), supporting the setting up of Building Preservation Trusts and ensuring that developers are working with these organisations from the start will help to ensure that projects are culturally sensitive, socially inclusive and economically beneficial.

Question HE4: What historic environment policies do you think would be most effective in the new local plan? Historic England continues to develop a suite of evidence-based documents that assist with policy development around historic buildings (HEANs etc.). Reference should be made to these and policies developed that conform with HE's own approach, noting that retrofitting and adaptation should not be promoted where significance will be harmed. Active management of moisture using traditional materials is more important than retrofitting which can cause rapid deterioration of building fabric.

Transport, Infrastructure and Facilities

Bullet 1 – The Council strongly supports the need to understand infrastructure capacity before planning for growth. However, the Council is concerned that the baseline report needs strengthening in this regard to set out that connectivity of a settlement is not the same as its capacity to absorb an increase in population numbers.

Bullet 2 – 'Poor connectivity remains a significant challenge across rural areas' is true and it also applies at a wider level between and within the larger settlements themselves and their links to villages, which could be used to strengthen this point.

Bullet 3 – The cumulative impact of development needs to be included as part of this bullet.

Baseline paragraph 2.9 makes some very valid points about infrastructure and service capacity but the Council doesn't feel that this comes through strongly enough in the summary.

Baseline paragraphs 7.4-7.9 cover long distance trails. These are welcomed for leisure activity but have little practical use for day-to-day support of active travel, particularly for employment and education commuting. The Local Plan should be concentrating on these shorter links to promote connectivity within and between settlements and drawing on the LCWIP (Local Cycling and Walking Infrastructure Plans).

Question TI1: How should the local plan explain the bigger picture of funding for infrastructure and services, and be clearer about what can and cannot be expected of developer contributions? The Local Plan should be ambitious for the area and acknowledge that planning policy and funding may change. The introduction of CIL (Community Infrastructure Levy) by the local authority should be considered and the Town Council would like less emphasis on defunding which overshadows other elements in the baseline report.

Question TI4: What do you see as the opportunities and risks of allocating larger sites? The Council supports the allocation of larger development sites which have their own facilities, subject to active travel links to larger settlements.

Question TI5: How should the local plan seek to protect existing community facilities which help meet the needs of local communities? Facilities in smaller towns and key villages need to be protected by directing development towards these places, thereby increasing use which will enable the facilities to be retained or added.

Question TI6: How should the local plan look to improve active travel infrastructure to make it easier for people to reach destinations by walking, cycling and wheeling? (Wheeling refers to using things like wheelchairs, mobility scooters and prams.)? The Local Plan needs to highlight the LCWIPs and ensure that day-to-day shorter routes are developed and/or improved, rather than the current emphasis in the baseline data on longer leisure routes.

Question TI7: How should the local plan ensure that new developments provide residents with good access to outdoor spaces and nature? The Local Plan needs to ensure that areas identified as green space/play/growing in new developments are accessible and useable for all, rather than being placed in areas of the site unsuitable for development. For example, the steep slopes allocated for such purposes in the Baltic Wharf and Follaton Rise developments in Totnes.

Question TI8: It is important that new development helps deliver necessary improvements to infrastructure. Which types of infrastructure should be given the highest priority? All the types of infrastructure listed are equally important and contribute to a healthy community. Development should not be permitted if it overwhelms existing facilities and their ability to support the increase in population. Where development happens in neighbouring villages, funding of existing facilities in larger settlements, for example sport and recreation facilities, should be considered rather than duplicating provision.

Question TI9: Do you agree that the railway network has a key role to play in enabling sustainable forms of development over the plan period, and that the local plan should seek to unlock the unrealised potential of railway infrastructure? The existing rail network and rail infrastructure is not resilient enough to support widespread development. Sustainable development shouldn't rely on delivery through the current rail system based on the pressure that it is under locally, for example the vulnerability of the track line along the coast between Dawlish and Teignmouth, and the gradient of the slope out of Totnes towards Marley Head which has meant some trains not stopping at Totnes during heatwaves.

Question TI10: What infrastructure policies do you think would be most effective in the new local plan? The Council is concerned that:

- the Baseline report draws on the combined authority's new transport plan where the focus is on main roads and not on improving links between settlements.
- The Department for Transport's connectivity Tool that the local authority is being asked to use does not address the lack of travel options facing rural areas in terms of frequency of service, nor that walking and cycling routes (both within Totnes and to

other nearby places) are actually not safe to use - it thus gives Totnes a much higher connectivity rating than it should have.

- There is no reference to settlements that are also through routes. For example, whilst Totnes is located in the travel to work area for Torbay it is negatively impacted by commuting between Torbay and Plymouth - which is not included within the Connectivity Tool. Capacity constraints are not considered nor are changes to driver behaviour with satnavs sending vehicles through town or down narrow lanes.
- Support is needed to integrate ticketing options for rail and bus use.