



The village of East Allington



0005/22/PIP
2 Dwellings

2412/22/OPA
35 Dwellings

1899/22/PIP
5 Dwellings

SH_19_02_08/13



PLANNING REF: 2412/22/OPA

DESCRIPTION: READVERTISEMENT (amended description & documents) Outline application with some matters reserved for residential development & associated access.

(Previously advertised as: Outline application with some matters reserved for the development of up to 35 dwellings & associated access, infrastructure, open space, landscaping & biodiversity net gain infrastructure)

ADDRESS: Land South of Dartmouth Road at SX 771 485 East Allington

6th September 2023

LETTER OF OBJECTION FROM THE SOUTH HAMS SOCIETY

The South Hams Society interest

For the last 60 years, the South Hams Society has been stimulating public interest and care for the beauty, history and character of the South Hams. We encourage high standards of planning and architecture that respect the character of the area. We aim to secure the protection and improvement of the landscape, features of historic interest and public amenity and to promote the conservation of the South Hams as a living, working environment. We take the South Devon Area of Outstanding Natural Beauty very seriously and work hard to increase people's knowledge and appreciation of our precious environment. We support the right development - in the right places - and oppose inappropriate development.

The South Hams Society continues to object to this application. The cumulative effect of development in the village of East Allington totaling 42 dwellings, is not supported by the Joint Local Plan.

In an attempt to make the application acceptable the applicant has changed the title of the application and removed two drawings, the Parameters Plan: Drawing Reference 745/004 rev. D and the Illustrative Site Plan: Drawing Reference 745/010 rev. E

The description of the proposal as advertised is wrong.

It is now being described as an Outline Planning Application and therefore should have been advertised as an **outline planning application (with all matters reserved except access)**.

The submitted Design and Access Statement states that **Outline Planning Permission is sought for up to 35 dwellings to be constructed on site** (Introduction page 3).

The planning application description should have contained that that description.

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National requirements for planning permission:

General requirements: applications for planning permission including outline planning permission

(1) Subject to paragraphs (3) to (5), an application for planning permission must—

(a) be made in writing to the local planning authority on a form published by the Secretary of State (or a form to substantially the same effect);

(b) include the particulars specified or referred to in the form;

(c) except where the application is made pursuant to section 73 (determination of applications to develop land without conditions previously attached) or section 73A(2)(c) (planning permission for development already carried out) of the 1990 Act F1 or is an application of a kind referred to in article 20(1)(b) or (c), be accompanied, whether electronically or otherwise, by—

(i) a plan which identifies the land to which the application relates;

(ii) any other plans, drawings and information necessary to describe the development which is the subject of the application;

(iii) except where the application is made by electronic communications or the local planning authority indicate that a lesser number is required, 3 copies of the form; and

(iv) except where they are submitted by electronic communications or the local planning authority indicate that a lesser number is required, 3 copies of any plans, drawings and information accompanying the application.

(2) Any plans or drawings required to be provided by paragraph (1)(c)(i) or (ii) must be drawn to an identified scale and, in the case of plans, must show the direction of North.

(3) Except where article 5(3) applies, an application for outline planning permission does not need to give details of any reserved matters.

The applicant has replaced part of the application form, the 'Description of the Proposal'. **The rest of the original application form remains the same** and in particular 'Pedestrian and Vehicle Access, Roads and Rights of Way' remains and states '**See parameters plan 004A and 1609-HYD-XX-XX-DR-TP-0001 P02**'.

The Parameters Plan: Drawing Reference 745/004 rev. D has been removed. Does that now mean that the plan stated in the application form is now the correct plan to be referenced?

The applicant states that the 'Proposed Access Arrangements: Drawing Reference 16089-HYD-XX-XX-DR-TP-0001 Rev 2' is still relevant. The application details contain two drawings of the same title and reference. Which one is the correct drawing?

In the application form under the heading of 'Foul Sewage', it states 'See drawing 16089-HYD-XX-XX-DR-D-2005 PO2 in Drainage Strategy prepared by Hydrock'.

We can find no such drawing within the application details.

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The drainage details do however contain the removed Illustrative Site Plan: Drawing Reference 745/010, only rev C.

Are we to assume that that drawing is now also removed?

The application does state that there are to be 35 dwellings, 25 Market Houses and 10 Social, Affordable or Intermediate Rent.

Is that part of the application form now not relevant after the removal of the number of dwellings in the application description?

The Design and Access Statement includes the illustrative plan stated to have been removed.

In other words, the proposal is now far from clear.

South Hams District Council planning requirements are stated to be:



[Home](#) > [Residents](#) > [Planning](#) > [Apply](#) > [Validating Your Planning Application \('Local List'\)](#) > [National Requirements](#)

Site Layout Plan or Block Plan

Information required and when required	Guidance
All applications	<p>A site layout or block plan must be provided as follows:</p> <ul style="list-style-type: none">Plans provided for both existing and proposed.Provided at a metric scale (1:200 or 1:500) and ideally scaled to fit onto A4 or A3Provided on an up-to-date mapIndicate a north pointShow the proposed development in relation to:<ul style="list-style-type: none">site boundaries,other existing buildings on the site,adjoining properties and the immediate area,roads, public rights of way, and position of trees/hedges, changes in levels, boundary treatment, vehicular/pedestrian access and existing and proposed parking.House names and road names should be labelledInclude any buildings to be demolishedIf the site area is edged in red this must match the location plan provided (not essential but can be helpful)If connecting to existing drainage system this should be indicated on the plan

Given that the Illustrative Site Plan: Drawing Reference 745/010 rev. E has now been removed, the Society are of the opinion that the application fails to meet the requirement that all applications must provide a site layout or block plan with the details described.

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In addition, the Society does not agree with this assessment of TTV25

TTV25

Finally, the Parish Council raised concerns regarding the number of dwellings built or granted planning permission within the Parish since the adoption of the Joint Local Plan in 2019. This matter was addressed at paragraph 5.6 onwards of the Planning Statement accompanying the planning application.

This planning application is brought forward under Policy TTV25 of the Joint Local Plan which requires provision of around 30 dwellings at East Allington as a Sustainable Village. Developments and planning permissions granted during the plan period will only contribute towards the requirement under TTV25 where individual proposals comprise 5 or more dwellings and are located within or adjoining the village and are well-related to the built form, benefitting from safe access to local services and facilities.

Planning permissions, sites under construction and infill proposals of less than 5 dwellings, and larger proposals distant from the built up area of the village do not contribute towards the requirement under Policy TTV25.

The only planning proposals which qualifies under the terms of TTV25 is the Permission in Principle (Reference 1899/22/PIP) granted for 5 dwellings to the north of Dartmouth Road which received permission in June 2023. These proposals remain subject to approval of Technical Consent.

TTV25

Policy TTV25

Development in the Sustainable Villages

Provision in the order of 550 homes will be sought from the sustainable villages as part of the overall housing supply for the TTV Policy Area.

The LPAs support the preparation of neighbourhood plans as a means of identifying local housing and other development needs in the sustainable villages. Development within the sustainable villages, including the indicative level of housing set out in Figure 5.8, should be provided through neighbourhood plans, unless such provision would conflict with other policies of the JLP.

Within sustainable villages without neighbourhood plans the LPAs will still support development that meets the identified local needs of local communities and development which responds positively to the indicative housing figures set out in Figure 5.8. All development proposals, whether in villages which have neighbourhood plans or not, will be considered against the other policies of this plan.



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The Society is not aware of any statements that exclude sites of less than 5 dwellings in the in the local plan for the sustainable villages.

The relevant policy statement for East Allington is in paragraph 5.10

Para 5.10:

At the next level of the settlement hierarchy are sustainable villages that have a limited but vital provision of services and amenities. The JLP envisages growth in these sustainable villages to meet local needs, and encourages communities to identify sites to meet these needs through neighbourhood plans.

The Society would like to know where this understanding has come from.

The JLP is clear that development should be provided

- through neighbourhood plans which come forward throughout the plan period;
- through the application of development management policies where there is no neighbourhood plan;
- through the possibility of separate planning studies which identify new sites, and which will be an evidence base input to the next review of the JLP.

To quote the agent for the applicant in a letter to the LPA's principal planning officer:

'This planning application is brought forward under Policy TTV25 of the Joint Local Plan which requires provision of around 30 dwellings at East Allington as a Sustainable Village'.

However TTV25 merely states:

'Provision in the order of 550 homes will be sought from the sustainable villages as part of the overall housing supply for the TTV Policy Area'.

That is not the same as a 'requirement', while:

Within sustainable villages without neighbourhood plans the LPAs will still support development that meets the identified local needs of local communities.

And the Joint Local Plan (5.13) makes clear:

A 'Sustainable Villages' allowance for these sites has been included in the housing land supply for the whole plan period, taking account of the sustainability of each village and the availability of sites in the SHLAA. It should be noted that whilst this allowance counts against the 5 year land supply for the Thriving Towns and Villages, and forms part of the housing trajectory for the policy area, the trajectory assumes that this source contributes to supply only in the later stages of the plan period, unless and until monitoring identifies actual commitments and completions.

The plan period runs from 2014 until 2034, we are yet to enter 'the later stages' and Annex 2 of the JLP refers to two monitoring targets for South Hams LPA over the plan period 2014-34: namely '5,800 net additional dwellings in the South Hams part of the PPA, annualised to 290 dwellings per annum and 4,500 net additional dwellings in the South Hams part of the TTV annualised to 225 dwellings per annum'.

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And, by the end of March 2022, no fewer than 4,469 of those new dwellings in the South Hams part of the TTV had already been delivered. The Authorities Monitoring Report stresses that number 'represents 1,389 more homes than would be expected if applying an annualised housing target for the area'.

In addition, a Freedom of Information Request submitted by the Society has revealed that by the same date, the end of March 2022, planning consent for a further 4,500 homes in the South Hams part of the TTV had already been given that had then yet to be built.

In other words, against a requirement of 4,500 homes, no fewer than 8,969 have either been consented or built – virtually double the Plan target, and considerably more than the 3,924 that the Plan's objectively assessed housing need originally said were necessary.

Were that not sufficient, according to the Five Year Housing Land Supply Position Statement 2022:

'There is sufficient flexibility in the supply identified which represents a headroom of 25%. No action is therefore required at this point to address supply in the South Hams LPA'.

Consequently the question arises, is this application necessary, sustainable, and does it meet the identified local need of the local community? For example, only 30% of the promised dwellings will be affordable and, of those, how many genuinely affordable? Does East Allington need more open-market housing, almost certainly unaffordable to the majority of those already living and working in the South Hams?

To again quote the Authorities Monitoring Report, at the end of 2022 *'homes in South Hams were 12.56 times the average wage in the area in comparison to 5.74 times the average wage in the year 2000.'*

Making matters worse, new residents will almost certainly have to commute to work by car. The Sustainable Villages Assessment notes there is no local employment area and no access to employment centres by public transport. Similarly there is no Post Office, no cash point, no chemist and no health centre. So even if those occupying the new dwellings are already retired, they will clearly be car dependant. Road Transport already accounts for 43% of overall South Hams carbon emissions, and we face a climate emergency.

The Parish Council have objected to the application, so it is safe to assume this development is one which fails to respond to local needs. There is also concern as to whether the local highways infrastructure is able to accommodate any increase in vehicle movements.

However, the Society find it impossible to consider that East Allington is a sustainable location with the declared climate crisis.

There is not the work available within the locality and there is no public transport to permit people to commute to work. It is therefore inevitable that most if not all the new residents will commute by car. The ever increasing vehicle movements make the narrow roads unsafe to walk and cycle on. It is not surprising that the village has never been included in the new recycling scheme that the District Council has tried to implement, given the width of many of the lanes and when the highway is of such a poor standard from the main 'A' road network.

Car journeys invariably involve reversing – unless you are lucky.

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East Allington has not progressed from recycling sacks, and it is not hard to see why. The access to the site is barely 4 metres wide in places and the mile long track to the local main road is one mile of single track with passing places, many of them small.



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Conversely, although South West Water offered 'no objection subject to the foul and surface water being managed in accordance with the submitted drainage strategy' and there is also supposedly spare capacity at East Allington Wastewater Treatment Works, it is noticeable that in 2022 sewage was dumped in to the waters of Small Brook, eventually entering the SSSI Kingsbridge estuary via Bowcombe Creek, on no fewer than 39 occasions for a cumulative duration of just under 306 hours. The previous year there were 37 incidents, lasting a total of 370.18 hours.

And in their May 2023 Drainage and Wastewater Management Plan South West Water acknowledged the overflow at East Allington was 'substandard', admitting the 'catchment requires additional investment to make it resilient for the future'.

Given TTV housing targets have now been achieved, any development in East Allington will only add to car usage, there appears to be no genuine local need for the development, we have yet to enter the later stages of the plan period, and the sewage works is already unable to cope, this application should be refused.

For and on behalf of the South Hams Society
Richard Howell
Chairman.