



The village of East Allington



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PLANNING REF: 2412/22/OPA

DESCRIPTION: 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

21st October 2022

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 is **objecting** to this application because the cumulative effect of development in the village of East Allington is not supported by the Joint Local Plan.

This application is so large that it is an important decision for the village of East Allington. Consequently the Society are of the opinion that this statement, taken from the landscape specialist's submission, is completely unacceptable.

'Officer familiarity with the landscape in the locality of the application site means that a site visit has not been undertaken at this time. An assessment of the application is based on an examination of the planning file and submitted plans together with reference to G.I.S., OS Mapping and aerial imagery, and a review of the following information:

Design and Access Statement, May 2022, GJR

Parameters Plan, 745 004 Rev A, GJR

Illustrative Site Plan, 745 010 Rev C, GJR

Landscape and Visual Appraisal, May 2022, FPCR'

Outline planning approval is the key stage to decide whether a location is suitable or not, for development.

The Society have visited the location on frequent occasions recently and have come to a different conclusion.

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East Allington FP No 2 – North Entrance View St Andrews Church to be obscured by buildings?



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East Allington FP No 2 – The South Entrance

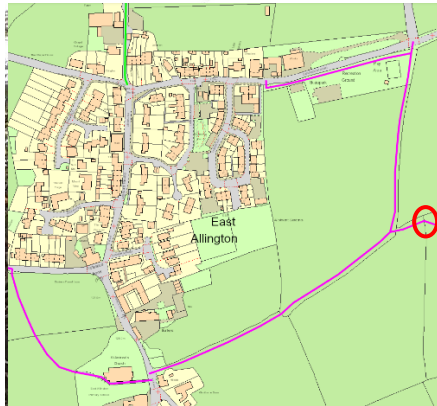


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East Allington FP No 3 - View of St Andrews Church to be removed by landscaping?



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East Allington FP No 2 – Ground level view to the northwest with the St Andrews Church landmark.



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East Allington FP No 2 – Looking North to the Scheduled Monuments at Stanborough Camp
Iron Age hillfort and bowl barrow.



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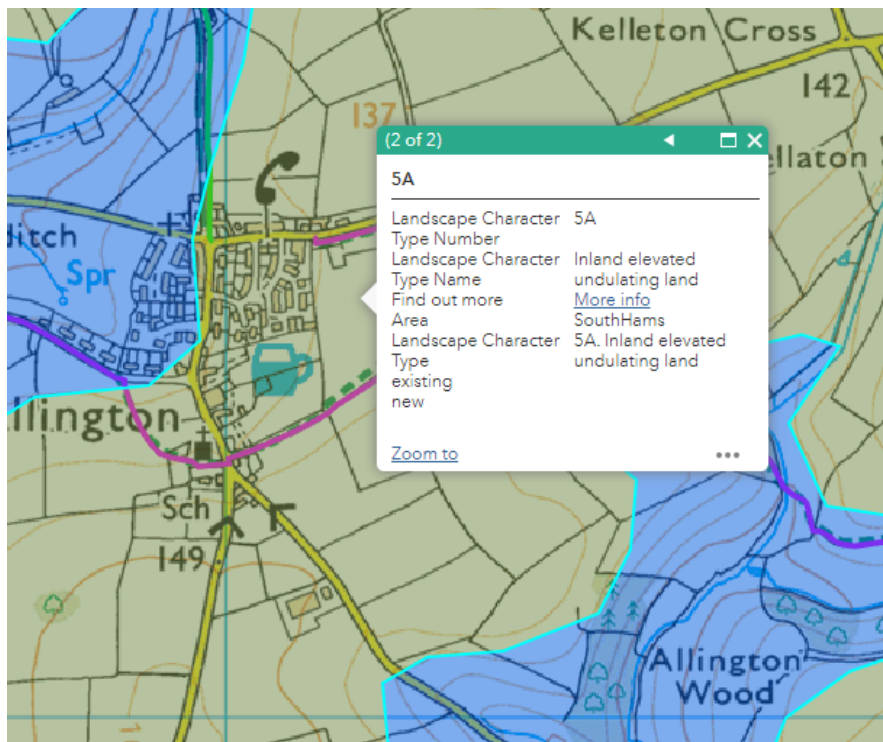


Because of the ridge line location, we consider the level of harm to be severe and damaging to the St Andrews Church landmark setting within the open landscape.

The Village of East Allington along with this site's location was designated as 'Area of Great Landscape Value', a designation that has been replaced by Landscape Character Assessments.

'Devon's landscape character assessment (DLCA) describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Devon. It also set out strategies and guidelines for the protection, management and planning of the landscape'.

It is correctly identified that the landscape character is 5A.



It is then important to see what the strategies and guidelines are for this location.

The Landscape Specialist makes no references to these and appears to ignore them completely.

The LCT consist of narrow elongated 'fingers' of higher land between the many rivers and estuaries in the south of the district.

Elevated undulating farmland which is generally open and treeless with little built development. Some areas extend towards the south coast and are influenced by coastal exposure and sea views.

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Summary of landscape condition

Because much of the landscape is unsettled and remote, its structure, with gently undulating open farmland, extensive views and lack of built development, is largely intact. Settlement is scattered, with isolated houses and farms, especially near the south coast, except for recent development on the edge of Dartmouth and Stoke Fleming which, where it has spread up into this LCT, is widely visible and intrusive. Adjacent urban areas are not generally apparent from within the LCT, except for Totnes where factory chimneys, the castle and traffic on major roads can be seen. The presence of pylons is visually intrusive. The A38 (including settlements along its length) intrudes on levels of tranquillity and dark night skies towards the north of the LCT.

Forces for change

- Changes in land ownership or agricultural intensification (pastoral to arable), which may lead to a loss of traditional medieval field boundaries, a decline in traditional hedgerow management techniques, and a change to existing landscape pattern as well as a gradual decline in wildlife species and their habitats.
- Decline in livestock numbers leading to scrub encroachment onto pastoral land.
- Continuing decline in traditional rural skills such as hedge-laying resulting in under management of hedgerows and verges in some areas.
- Continuing pressure for development particularly due to the LCT's proximity to the urban fringes of Totnes, Dartmouth, Kingsbridge and Salcombe, and along the A38. Development in these areas could affect the rural character and sense of tranquillity of the LCT.
- Further expansion of smaller settlements adjacent to the LCT, onto the upper slopes where they could be highly visible within this elevated landscape (e.g. Loddiswell and Morleigh).
- An increase in traffic levels, and the increasing size of farm machinery on narrow rural lanes is likely to diminish levels of tranquillity and increase pressure to widen spine roads, eroding their rural character and important banked verge habitats.
- Pressure for new telecommunications masts, pylons and wind turbines, which would be highly visible on prominent skylines.
- Pressure for new leisure and recreational development (e.g. diversification of farms to caravans/campsites and conversion of small traditional farm buildings, particularly barns, to accommodation which can increase the need for new agricultural buildings elsewhere), affecting the rural character and sense of tranquillity of the LCT.



Landscape Guidelines

- Manage the **ridge top tree clumps and shelterbelts** which form characteristic features within the open landscape, encouraging the development of further beech and pine hedgerow trees.
- Protect and maintain the **historic field patterns of the landscape**, restoring and replanting lost and gappy Devon hedges (particularly on intensively farmed slopes where they can provide a role in stabilising the soil and reducing agricultural runoff into watercourses). Respect any local variations in Devon hedge construction and topping hedgerow species, utilising local materials wherever possible.
- Manage important areas of **rough grazing and gorse scrub on upper slopes** through a continuation of livestock grazing at appropriate levels. Manage and re-link fragmented patches of unimproved species-rich grassland. Support farmers to continue to farm these 'marginal' areas as an integral part of their farming system.
- Manage and enhance the **wildlife interest of agricultural fields** by encouraging the creation of uncultivated field margins and grass buffer strips around intensively farmed fields. These measures will also help reduce diffuse pollution into adjacent water courses draining from the plateaux.
- Protect and appropriately manage the landscape's **archaeological heritage** including nationally important prehistoric burial sites, ancient hilltop enclosures and historic quarries, providing sensitive interpretation where appropriate.
- Protect the **sparsely settled character** by carefully controlling any new development outside the existing footprints of the landscape's small settlements. Ensure that any change and/or diversification of farms to caravans/campsites are of a small scale, low key and unobtrusive.
- Protect the landscape's **traditional building styles and materials**, of exposed stone and slate hanging, slate roofs and some whitewashed cottages with thatch. Any new developments or extensions should utilise the same materials and building styles wherever possible.
- Protect rural lanes and **ensure any highway improvements are sympathetic**, resisting intrusive signage, engineered splays, and following local guidance for management of roadside verges. Screen visually intrusive sections of the A381 and B3196, and consider the introduction of noise attenuation measures and reduced lighting on major road corridors.
- Seek opportunities to **extend recreational routes and improve linkages** and support facilities where this does not damage the conservation and enhancement of natural beauty.
- Protect the landscape's **far-reaching views and the open character** of the undeveloped skylines, avoiding insensitively-sited development on prominent ridgelines or open slopes where it would be visible within the wider landscape. Ensure local church towers and ridgeline tree clumps remain landmark features on skylines.
- Protect the **strong perceptions of tranquillity and remoteness** in the landscape, with its well managed fields enclosed by an intact network of species-rich Devon hedges through the control and management of development, and ensure the area remains valued for recreation.

The Society believes this development location to fail these guidelines and we find it hard to accept that the County Council Landscape guidelines are to be ignored by the District Council.

Landscapes are part of the Joint Local Plan, policy DEV23.

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Policy DEV23

Landscape character

Development will conserve and enhance landscape, townscape and seascape character and scenic and visual quality, avoiding significant and adverse landscape or visual impacts. Development proposals should:

1. Be located and designed to respect scenic quality and maintain an area's distinctive sense of place and reinforce local distinctiveness.
2. Conserve and enhance the characteristics and views of the area along with valued attributes and existing site features such as trees, hedgerows and watercourses that contribute to the character and quality of the area.
3. Be of high quality architectural and landscape design appropriate to its landscape context.
4. Be located and designed to prevent erosion of relative tranquility and intrinsically dark landscapes, and where possible use opportunities to enhance areas in which tranquility has been eroded.
5. Restore positive landscape characteristics and features that reinforce local landscape quality and distinctiveness.
6. Where necessary, be supported by Landscape and Visual Impact Assessments and landscaping schemes that enhance that proposed development.
7. Avoid, mitigate, and where appropriate compensate, for any residual adverse effects and take opportunities to secure landscape character and visual enhancements.



The chosen location for this development could not be worse.

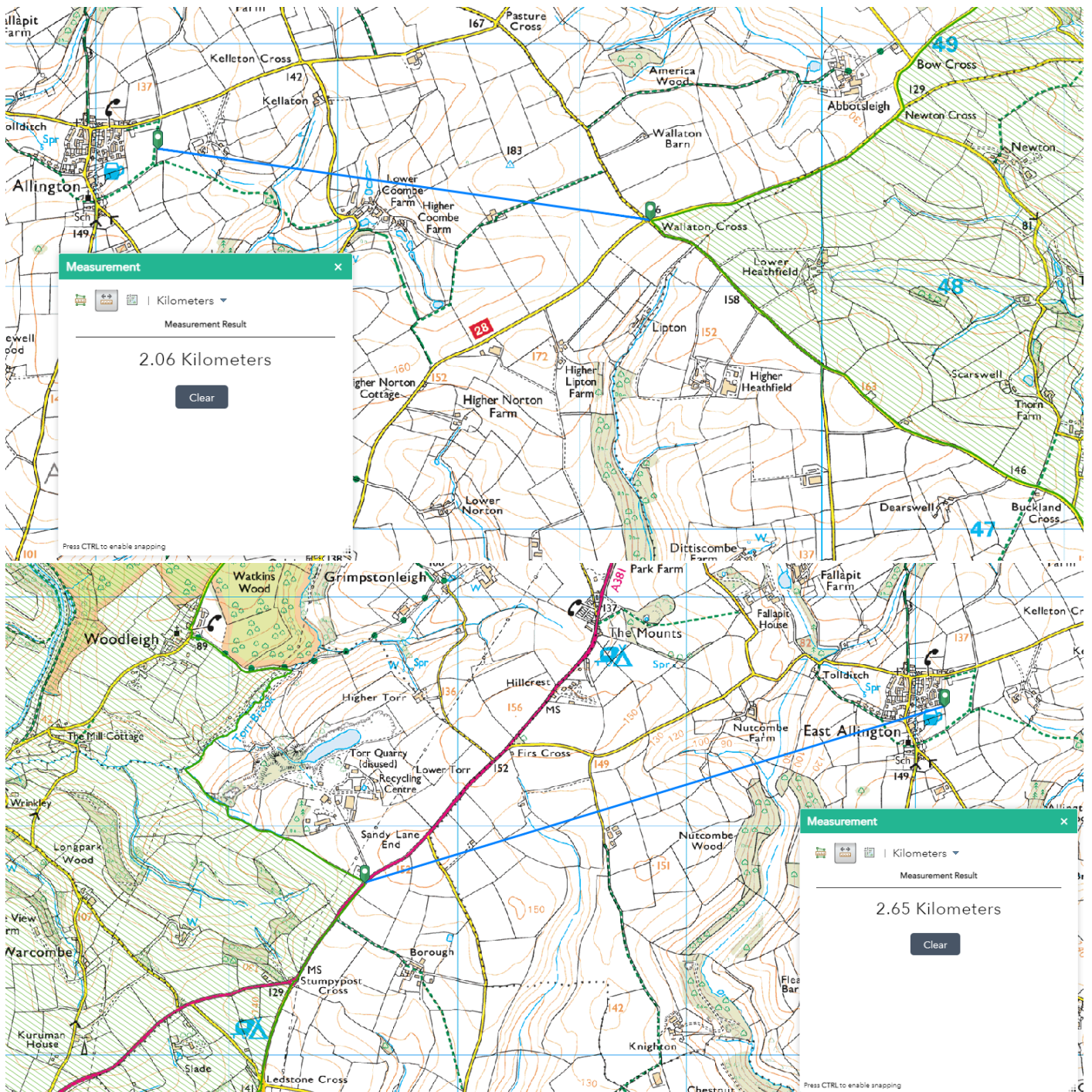
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The supplied LVIA states the following which are wrong, a point not spotted by the Landscape Specialist:

4.18 The site lies approximately 2.5km to the west and approximately 3.5km to the east of the South Devon Area of Outstanding Natural Beauty (AONB). The site lies approximately 5km from the northwest of the Undeveloped Coastline Policy DEV25 within the Plymouth and South West Devon Joint Local Plan 2014 -2034.



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The LVIA again makes errors regarding the location of the South Devon AONB.

- 4.28 Landscape Designations: The site and its wider landscape context are not subject to any national, local or other landscape designations. The site is approximately 3.5km from the South Devon AONB both to the east and west.



In 2022 seven dwellings have been given planning in principle approval at the village of East Allington. Application 0005/22/PIP has given approval for the development of 2 dwellings and 1899/22/PIP has given approval for 5 Dwellings. This proposal brings forward a further 35 dwellings which would bring the total number of new dwellings to 42.

This number is 40% more than the local planning authority stated as an appropriate number for this small village in the JLP presented to the Planning Inspectorate.

Currently, there are 175 dwellings in East Allington. This development alone will increase the size of the village by 20%. Including the permissions already given, the increase in the size of the village would be 24%. The Society finds it hard to believe there to be a need for so much additional housing in a village of this size.

This proposed site was also never presented as a site for the District Council's call for sites. The Society wishes to remind the District Council of its commitment made to the Planning Inspectorate that development proposals for the sustainable villages would come forward through the Neighbourhood Planning Process, allowing residents to have the ability to assess and shape their environment. Where this does not occur, the LPA stated, *if monitoring shows that Neighbourhood Plans are not bringing*

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*forward allocations to support Policy TTV25, the **LPA's will consider undertaking informal planning studies to identify new site opportunities.***

Currently the Society see no community led involvement in neighbourhood planning in East Allington to determine what is best for their community, or any housing site assessments being prepared by the LPA, as was the case for the development proposals included in the JLP.

The most important JLP policies are as set out below.

JLP Policies for development in the sustainable villages

TTV1

Prioritising growth through a hierarchy of sustainable settlements

The LPA's will distribute growth and development delivering homes and jobs in accordance with the following hierarchy of settlements, enabling each town and village to play its role within the rural area:

- 1. The Main Towns - which will be prioritised for growth to enable them to continue to thrive, achieve strong levels of self-containment, and provide a broad range of services for the wider area.*
- 2. Smaller Towns and Key Villages - which will receive support for growth commensurate with their roles in supporting the small villages and hamlets.*
- 3. Sustainable Villages - where **development to meet locally identified needs** and to sustain limited services and amenities will be supported.*
- 4. Smaller villages, Hamlets and the Countryside - where development will be permitted only if it can be demonstrated to support the principles of sustainable development and sustainable communities (Policies SPT1 and 2) including as provided for in Policies TTV26 and TTV27.*

Paragraphs:

*5.5 The plan does not define settlement boundaries. **However, development outside built up areas will be considered in the context of Policy TTV26 (development in the countryside).** Neighbourhood plans may choose to identify settlement boundaries for their towns and villages. A consistent approach will be encouraged through the use of overarching principles for the drawing of settlement boundaries established by the LPA's. These principles, which were published in the JLP Settlement Boundaries Topic Paper, will be incorporated in the Thriving Towns and Villages SPD.*

*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 Sustainable Villages are** Berry Pomeroy, Blackawton, Bratton Clovelly, Bridestowe, Broadwoodkelly, **East Allington**, Ermington, Exbourne, Folly Gate, Halwell, Harberton, Harbertonford, Highampton, Inwardleigh, Lamerton, Lee Mill, Lee Moor, Lewdown, Marldon, Milton*



Abbot, Monkokehampton, Morleigh, Northlew, Rattery, Sampford Courtenay, Sparkwell, Spreyton, Staverton, Stowford, Ugborough, Woolston Green and Wotter.

5.12 Figure 5.1 identifies how site allocations have been distributed across the settlement hierarchy set out in Policy TTV1. The rest of this chapter sets out individual objectives for each level of the settlement hierarchy in more detail, and the development allocations for new housing and employment to deliver the objectives set out in SO6. **In the Sustainable Villages the JLP does not specifically allocate sites for development. In these villages, it is anticipated that housing will be provided for in the following ways:**

- **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.**

5.13 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.**

This approach avoids the risk of the JLP predetermining the outcome of the neighbourhood plan making process.

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.

Paragraphs:

5.161 The JLP does not identify sites for development in the villages defined as being the Sustainable Villages. Rather, an approach is taken which aims to enable development to come forward in these



villages which reflects their sustainability, and which will respond to local needs. In these locations, it is clearly important to strike a balance so that development maintains or improves the viability of the villages whilst also being of an appropriate scale and meeting the needs of local people. It is also important that any development in the Sustainable Villages also respects the character of the villages, and particularly of any landscape designations such as the AONBs.

5.162 In the Sustainable Villages, the most appropriate way to balance these considerations will often be for local people to develop neighbourhood plans, responding to local needs and opportunities. The LPAs are supportive of the neighbourhood planning process as a means of identifying and responding to local needs for development and the delivery of sustainable communities. However, where there is no neighbourhood plan, development proposals could come forward through the planning application process, and these would be assessed against the policies of the JLP. It should be noted that neighbourhood plans can also be brought forward for other parts of the Plan Area, but Policy TTV25 specifically relates to their role in meeting local needs in the Sustainable Villages.

5.163 It will be for neighbourhood plans themselves to determine which sites to bring forward for development, provided that they are consistent with the provisions of the JLP. To help identify a potential housing supply figure for the individual Sustainable Villages, and to provide some guidance for the level of housing that might be appropriate in a village, an indicative assessment has been made of the potential number of homes that are capable of coming forward through neighbourhood plans (the South Hams & West Devon Village Sustainability Assessment Framework', Feb 2017). This assessment is based upon factors such as the level of services and facilities available in each settlement, the accessibility of larger settlements, the quality of digital communications, and the availability of sites in the SHLAA. These indicative housing figures are set out in Figure 5.8.

5.164 The indicative housing figures should be used to inform neighbourhood plan or development plan-led development throughout the TTV policy area. Commitments and completions within sustainable villages prior to the end of March 2017 are not considered to make a contribution to the indicative figures, as these have already been counted within the JLP housing supply figures. The figures should be interpreted locally, applying constraints and opportunities. It is therefore understood that some neighbourhood plans may deliver more or less than indicated where justified by the appropriate level of evidence. The LPAs will keep under review the number of new homes coming forward in the Sustainable Villages over the life of the JLP. **If monitoring shows that Neighbourhood Plans are not bringing forward allocations to support Policy TTV25, the LPAs will consider undertaking informal planning studies to identify new site opportunities that can be built in to the next review of the JLP.**

Strategic Objective SO10

Maintaining a naturally beautiful and thriving countryside

To protect, conserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes development in unsustainable or inappropriate locations.

1. Delivering new homes only in areas where there is an identified local need.

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2. Protecting and managing the landscape.

3. Contributing to carbon reduction measures by reducing the need to travel.

4. Delivering digital connectivity that supports diversity and innovation in the rural economy.

5. Responding positively to rural travel patterns through innovation and investment.

6. Strengthening links between our rural settlements and the surrounding landscapes.

From these policies there was a clear commitment for development to come forward through the Neighbourhood Planning process and it was accepted that this would likely be towards the end of the plan timeline. This is similar to the local plan process where residents have the opportunity to identify their local community assets, green areas and valuable views and assess and identify areas of land appropriate for development to meet their community needs.

Where Neighbourhood plans fail to come forward, the LPAs stated that they will consider **undertaking informal planning studies to identify new site opportunities.**

Both these processes effectively use assessments to identify appropriate locations for development.

These plan led processes could require inclusion of a sustainability appraisal and strategic environmental assessment.

As far as the Society can tell, none of the development sites coming forward for East Allington has been subject to a sustainability assessment or an environmental assessment.

The District Council did submit settlement boundaries for the Joint Local Plan examination but never consulted the residents. These settlement boundaries were to be the starting point for settlement boundaries for Neighbourhood Plans to be included or amended.

East Allington's boundary plan submitted by the District Council.



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East Allington's settlement boundary produced by the LPA shows that this proposal is to be considered as development in the countryside as stated in paragraph 5.5 of the JLP (page 181)– *'The plan does not define settlement boundaries. However, development outside built up areas will be considered in the context of Policy TTV26 (development in the countryside).'*

The Society conclude that one of the key policy's for this site is TTV26.

Neither the submitted Planning Statement or the Design and Access Statement make reference to this key policy.

The Society include the TTV26 policy on the following page which is the Joint Councils strategic aim for this location unless the site is included as a suitable site for development within a neighbourhood plan and the settlement boundary is amended by any neighbourhood plan.

The Society refers the Case Officer to the decision notice for planning application 1899/22/PIP and in particular paragraph 4:

'The Technical Details Consent application may be subject to a S106 for occupants to meet Local Connection requirements to ensure housing delivered on this site accords with the Plymouth and South West Devon Joint Local Plan 2014-2034 policy TTV1 which requires developments outside of the settlement hierarchy to demonstrate it meets a local housing need'.

The Society would argue that a development proposal where only 30 % is affordable housing fails to address only local housing need. Again, the application fails to provide any local housing need evidence to demonstrate this application meets a local housing needs.

It is the Society's opinion that the proposal fails to be supported by policy TTV 26.



Policy TTV26

Development in the countryside

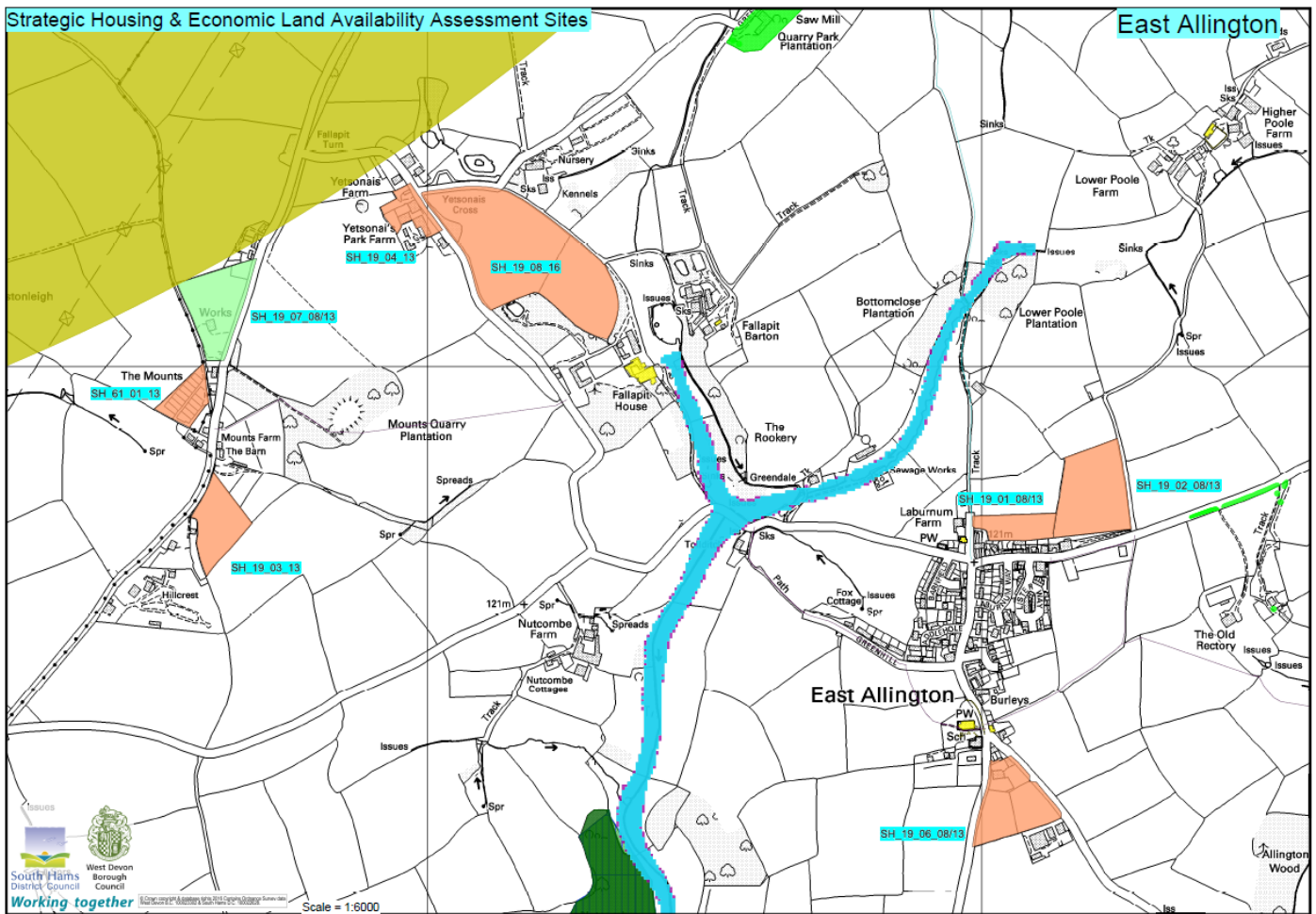
The LPAs will protect the special characteristics and role of the countryside. The following provisions will apply to the consideration of development proposals:

1. Isolated development in the countryside will be avoided and only permitted in exceptional circumstances, such as where it would:
 - i. Meet an essential need for a rural worker to live permanently at or near their place of work in the countryside and maintain that role for the development in perpetuity; or
 - ii. Secure the long term future and viable use of a significant heritage asset; or
 - iii. Secure the re-use of redundant or disused buildings and brownfield sites for an appropriate use; or
 - iv. Secure a development of truly outstanding or innovative sustainability and design, which helps to raise standards of design more generally in the rural area, significantly enhances its immediate setting, and is sensitive to the defining characteristics of the local area; or
 - v. Protect or enhance the character of historic assets and their settings.
2. Development proposals should, where appropriate:
 - i. Protect and improve public rights of way and bridleways.
 - ii. Re-use traditional buildings that are structurally sound enough for renovation without significant enhancement or alteration.
 - iii. Be complementary to and not prejudice any viable agricultural operations on a farm and other existing viable uses.
 - iv. Respond to a proven agricultural, forestry and other occupational need that requires a countryside location.
 - v. Avoid the use of Best and Most Versatile Agricultural Land.
 - vi. Help enhance the immediate setting of the site and include a management plan and exit strategy that demonstrates how long term degradation of the landscape and natural environment will be avoided.



There were a number of submitted sites considered for the village in the JLP.

Those that were assessed for the JLP are shown below. As far as the Society can ascertain, the sites that were presented for assessment were rejected, while those not presented are now being accepted without any assessment by the LPA.



The two adjoining sites on the north side of the Dartmouth Road totalled 2.45 hectares (SH_19_08_08/13 and SH_19_02_08/13). The adjacent location now has principle approval for 5 dwellings.

For the larger site of 1.83 hectares, it was stated *'The site is visually prominent and large scale development in this location would significantly change the character of the area'* (SH_19_02_08/13).

The site of this application is 2.91 hectares in size (2.48 Ha for the large field), equally visually prominent, and also significantly changes the character of the area and sacrifices the open quality of village public footpaths through the field.

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The rejected sites

SH_19_01_08/13	Land Rear of Townsend Terrace and Dartmouth Road, East Allington	0.61	<p><u>Access</u> The site is close to the village centre but access to the site is constrained from the western side and access to the eastern side could only be achieved if the adjoining field were also developed.</p> <p><u>Landscape and Ecology</u> The scale of development required to achieve access to the site would be inappropriate in this location. Achieving a logical northern boundary to the site could also be difficult which could lead to development being uncontained and visually intrusive.</p> <p><u>Heritage and Archaeology</u> The site is close to a listed building.</p> <p><u>Flood risk, water quality and drainage</u> No constraints have been identified at this stage but further assessment may be required as part of any pre-application process.</p> <p><u>Contamination and Environmental Health</u> The site is adjacent to former fuel storage which may have possible contamination issues.</p> <p><u>Other</u> There is a public right of way on the western boundary of the site.</p>	Due to the significant constraints identified relating to its location and access, the site is not considered to have potential for development at this time	Significant constraints
SH_19_02_08/13	Rear of Dartmouth Road, East Allington	1.83	<p><u>Access</u> This is a large level site that is detached from the village making connectivity to existing services and facilities difficult to achieve. It is unclear how the site would be accessed, the narrow road to east of site not appropriate for access, and there is no footway leading to the village.</p> <p><u>Landscape and Ecology</u> The site is distant from the village centre and due to the plateau characteristics of part of the site, development here could be visually intrusive. The site is visually prominent and large scale development in this location would significantly change the character of the area.</p> <p><u>Heritage and Archaeology</u> No constraints have been identified at this stage but further assessment may be required as part of any pre-application process.</p> <p><u>Flood risk, water quality and drainage</u> No constraints have been identified at this stage but further assessment may be required as part of any pre-application process.</p> <p><u>Contamination and Environmental Health</u> No constraints have been identified at this stage but further assessment may be required as part of any pre-application process.</p> <p><u>Other</u> Public Right of Way to south of site.</p>	Due to the significant constraints identified relating to its location and scale, the site is not considered to have potential for development at this time	Significant constraints

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The developments of East Allington village.

December 1943 - East Allington, the pleasantly situated but scattered community.



Development to the west of the village is limited to the 6 dwellings at Greenhill (late 60s/70s) and the 24 dwellings of Barnfield (mid-late 80s).



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Year 2000 satellite image shows the historic core of East Allington hatched.

Greenhill development ringed.



In 1986 an approval was given for 24 dwellings to the west (19/0515/85/3).

Condition d) stated:

(d) The existing bank and hedge between the proposed development and land to the west shall be retained and maintained to the satisfaction of the Local Planning Authority.

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The Barnfield development.



There appears to have been a breach of the planning condition starting in 2013 with the loss of the historic hedgerow.

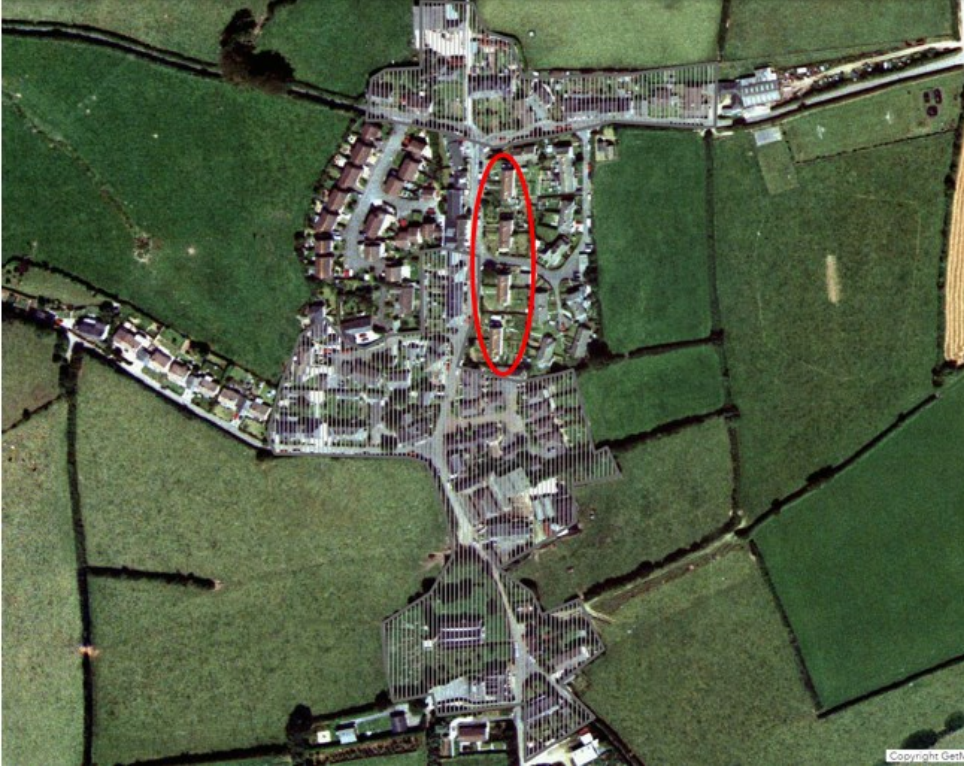


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To the east of the village, 8 post war dwellings in the allotment gardens field.



Followed by the 18 dwellings of Laburnum Way (1960/70)



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Following planning applications in 1988 and 1993, the last greenfield development was approved in 2004.

The 36 dwellings of Lister Way.



These greenfield developments of 92 dwellings can be added to the brownfield developments that have occurred. Bunkers Farm is an example.

East Allington is accessed by the three narrow lanes which sadly can no longer be described as pleasant routes for pedestrians and cyclists. We found using the lanes often means reversing and if you meet a large vehicle, reversing a long way or as we found on the Stanborough Hundred to Slapton lane upon meeting a modern construction lorry, being forced to turn down a lane (two vehicles) and then taking a leap of faith reversing back onto the lane to continue. It is unlikely that there would be any crash statistics due to the fact that these lanes tend to mean vehicle speeds are low although we had one near miss on approaching a corner on the Fallapit route on the Kingsbridge exit.

The primary school lane route is limited to vehicles of no more than 6 feet wide.

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The two other routes, the Dartmouth lane and the Kingsbridge lane, the Kingsbridge route is clearly the busiest route as we found the road surface to be in a very poor state of repair.

There is no doubt to the Society that villagers will be in for a tough time if modern large construction lorries are serving any large construction site in this village.

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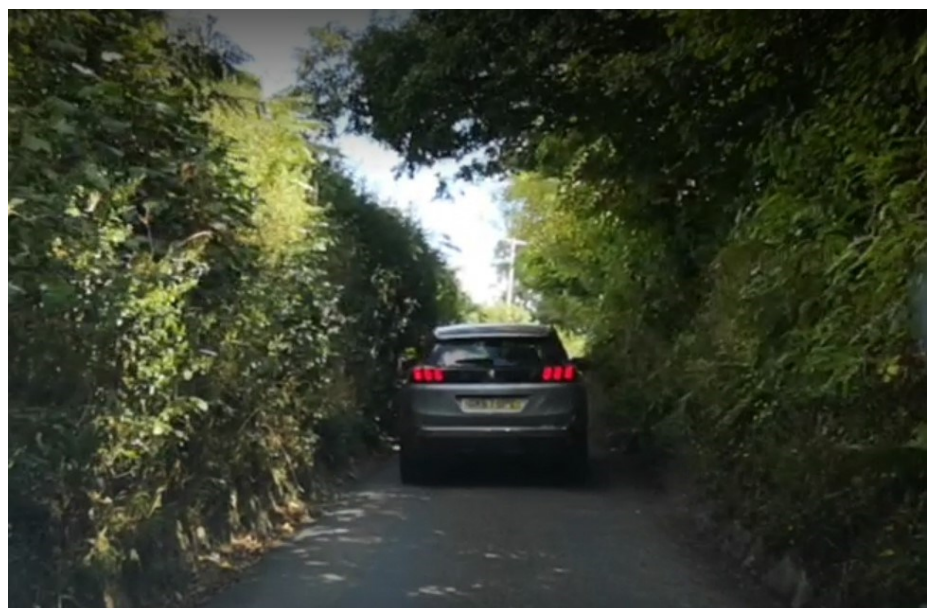
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The Kingsbridge School Bus. Any vehicle meeting a large vehicle like this is in for a long stretch of reversing.



The single track lane where often you can't see the next passing place.



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The village is located at least one mile from the A381 on the Kingsbridge lane, or two miles by the Dartmouth road Totnes route.

The Laburnum and Lister Way developments failed to widen the road in the village leaving a 4 metre wide lane partially obstructed by the telephone exchange entrance wall.

The Society asks, with the current inadequate single lane high Devon banks and hedgerow road system that serves East Allington, who has decided that this village is a sustainable location.

Referring to JLP policies for connectivity and transport.

Policy SPT9-10: Transport

These policies seek to establish a strategic approach to transport planning and strategy, managing growth and the demand for travel, encouraging and enabling more journeys by walking, cycling and public transport as a genuine option for commuting and other journeys and establishing a hierarchy of travel modes which prioritises pedestrians and cyclists.

The village of East Allington is typical of the old farming communities buried in the narrow lanes of the South Hams. It is apparent in the roll out of the District Council's recycling scheme, in cooperation with FCC Environment, that both failed to understand the South Hams narrow lane countryside and the difficulties of access that they present.

Not surprisingly, East Allington is one of the villages of the District Councils recycling lorry saga where the large recycling vehicle met with access issues and the village remains on the old blue and clear bag collections (after once trying and giving up).

Because of the growth of housing in this small village, it is already apparent that the lanes are not comfortable environments for pedestrians and cyclists seeking public transport, and that the one village bus service a day consists of a morning shopping service after 9 am returning just after lunch.

There is little work in the village so further village growth will be car commuters adding significantly to the vehicle movements in and out which clearly fails to respond to the climate crisis.

The Society view the village of East Allington as being similar to Blackawton where it was thought that the location was suitable for a large development.

We note with interest a recent comment regarding Blackawton in the 'My Place, My Views' public consultation. The village's closest regular bus service is also one mile away at Woodlands.



Dissatisfied

What is the place you would like to comment on?

Blackawton

How do you usually get here?

Bus and walk

What kind of place is it? (Select all that apply)

- A place to go walking or cycling

How does this place make you feel?

Mostly negative

Which of the following phrases apply to this place?

- Boring/Dull
- Hard to get to
- Run down

Imagine this place in five to ten years, what is it like? What has changed, if anything?

NEEDS Better GP access NEEDS a Regular bus into the village NEEDS it's roads repairing NEEDS old stone walls repairing NEEDS a street cleaner again NEEDS better internet and other BASIC infrastructure upgrades

Any other comments about this place?

cut off in the middle of nowhere and is growing to quickly with to many new houses being whammed onto it with NO infrastructure upgrades being done, roads being left unrepaired, footpaths left unchecked, no bus in and out of the village except for an at risk volunteer run west dart bus, the water treatment is also prone to overflowing as it now has to many houses and cannot support them, there is no mobile signal, and internet/landline phones suffer frequent "black outs" due to the out of date internet exchange being so overloaded and not even knowing what the new fibre optic are as it's still on post ww2 degrading copper wire!

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The Society can understand that sentiment and we believe the District Council should consider whether it is right to abandon people in these remote unserved villages. That message could not be clearer.

National Planning Policy Framework Policies Sustainable Transport.

Considering development proposals.

110.

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code and
- d) **any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.**

111.

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

112.

Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and



e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

113.

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

We have reviewed the Transport Statement and find similarities to the Blackawton Transport Statement except for the fact that Blackawton is on the National Cycle route whereas East Allington is not. But clearly it is recorded by the 'My Place, My Views' public consultation survey that Blackawton *'is cut off in the middle of nowhere'* and the Society are of the opinion that anyone reliant on walking and public transport at East Allington will arrive at the same conclusion.

It is also worth noting that vehicles entering and leaving the proposed development site will do so through an entrance on to the Dartmouth Road located between the village to the east and the entrance to the existing play space in the north west of the site.

The location of the site, coupled with both the means of vehicle access and the lack of employment that makes it a location dependent on commuting, causes it to fail to conform to paragraph 112 of the NPPF.

The Society believes that,

- The Landscape Character Guidelines do not support this location as an appropriate place for development.
- That the District Council should follow the agreed path with the Planning Inspectorate, contained within the JLP, to bring forward developments within a neighbourhood planning process so that there is community involvement and support in the process of shaping their village.
- That the housing needs are evidenced based and that housing in this location will not abandon people with no means of personal transport as is recorded at the very similar village of Blackawton.
- The housing numbers far exceed the numbers deemed suitable for this village presented to the planning inspectorate. This proposal will not address the housing crisis (which is an affordability crisis).
- That the lanes are adequately assessed for the impact of any increased level of commuting on other users (pedestrians and cyclists). This should include consideration as to the likely impact of commuting by car and whether that is compatible with addressing the climate emergency. The consequences do not appear to be supported by the NPPF. Any transport based statement should include local resident experience input rather than a transport report produced by a company 87 miles away at Camborne who cannot possibly have a real understanding of the road network and the experience of actual local users.

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