

ED43: Alternative Site Allocations in Buckfastleigh

Matter 9: Site Allocations

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1. Introduction

1.1. This Paper has been prepared in respect of Matter 9 of the Dartmoor Local Plan Hearings at the request of the Inspector. It sets out the context of DNPA's proposal to remove Proposal 7.6(2) (Land at Holne Road) from the submitted Local Plan, the proposed modifications including consideration of an alternative (replacement) site, and the implications of this in respect of housing delivery.

1.2. The Inspector's note 8 (ED42 - post hearing action points¹) states at 9.1:

"Proposal 7.6. In light of a recent refusal of planning permission for housing development on this site, there is concern that this site would be unlikely to be capable of delivery within the Plan period. The Authority to prepare a MM to delete Proposal 7.6 and identify an alternative site, which would deliver the same number of units, to meet identified development needs in Buckfastleigh."

2. Allocated sites at Buckfastleigh

2.1. The extant Local Plan (Development Management and Delivery DPD 2013) identifies the following 3 sites in Buckfastleigh.

2.2. **BCK3 – Devonian Products** - Since the adoption of the Plan, the redevelopment site BCK3 is no longer available; the landowner is instead retaining the full extent of the land and has pursued the renewal and intensification of employment uses on the site, alongside the retained Devonian Products operation.

2.3. **BCK1 - Barn Park** – an application was submitted in 2018 for the erection of 28 dwellings (10 affordable and 18 open market). The application has taken a significant amount of work on both sides to get to its current position. The application is still being processed, and currently DNPA is awaiting further information from the applicant, in response to our third party assessment of the submitted viability appraisal. Subject to this being resolved the application should be capable of moving forward favourably.

2.4. **BCK2 – Holne Road** - application 0452/18 (Residential development for up to 30 dwellings together with associated highways and drainage infrastructure, open space and landscaping) was considered by the Development Management Committee in September 2020 – the [report](#) recommending refusal is online as is the [minute](#) of the decision. The application was refused.

2.5. The draft Local Plan (Regulation 19) included the following allocations carried forward:

- Proposal 7.5(2) – land at Barn Park
- Proposal 7.6(2) – land at Holne Road

This was prior to the refusal of application 0452/18 at Holne Road, and in recognition of the fact that the land at Devonian Products was no longer available, and would therefore not be deliverable within the plan period.

¹ https://www.dartmoor.gov.uk/__data/assets/pdf_file/0030/385680/ED42-Dartmoor-Local-Plan-Inspector-Note-8-Post-Hearing-Action-Points.pdf

3. BCK2/Proposal 7.6(2) – Holne Road: deliverability

3.1. The Committee Report for application 0452/18 notes:

“The purpose of allocated housing sites within the Dartmoor Local Plan is to ensure the delivery of affordable housing within the National Park’s larger, more sustainable settlements. Hence, the whole objective for their allocation is to deliver on site affordable housing with the policy requiring a split of not less than 50% affordable housing, although this may be varied where a higher proportion of open market housing can be shown to be essential to secure the overall viability of development or the delivery of significant local infrastructure provision of clear benefit to the local community. The application proposes 100% market housing on the site with an off-site contribution offer toward affordable housing.”

“Whilst the viability report clearly needs updating to include evidenced sales and construction figures, align with NPPG requirements for land value calculations, and to take into account further abnormal costs for land purchase of nearby land for bat mitigation (see biodiversity section of the report below), the scheme clearly fails to deliver any on-site affordable housing in direct conflict with local housing policies COR15, BCK2 and COR21 and the strategic objective for housing allocation sites on Dartmoor and thus the rationale for the policy BCK2.”

3.2. The application was not supported by sufficient information in respect of the Appropriate Assessment Requirements. In this regard, the Committee Report notes:

“As the LPA is unable to complete the AA, it does not need to formally consider the derogation tests under DEFRA guidance, however, officers’ informal view is that if there was sufficient information to complete the AA and if that confirmed a likely significant adverse impact on the SAC, there wouldn’t be imperative reasons of over-riding public interest to grant this development in the National Park. This is because the proposal makes no on-site provision for affordable housing, a fundamental requirement of Dartmoor Local Plan’s strategy for sustainable development and meeting local housing needs in the National Park.”

3.3. The officer’s report sets out that the application was not supported by appropriate information regarding viability. The application did not provide for on-site affordable housing as required by the allocation, and although incomplete in respect of evidence, the application strongly indicated that a meaningful on-site affordable housing contribution was unachievable. Notwithstanding the need for more detailed viability calculations to comply with NPPG, DNPA does not have reason to contest the viability appraisal’s overall conclusions.

3.4. Furthermore the application was not supported by appropriate information in respect of the Habitat Regulations, in order for DNPA as competent authority to conclude no likely significant effect on the South Hams SAC (Special Area of Conservation). Again whilst the detail was lacking, what the application demonstrated is that, given the need to lawfully demonstrate IROPI (Imperative Reasons of Overriding Public Interest) for the proposal to be approved, the site may be unable to achieve this when considered in the context of a nil affordable housing contribution.

3.5. In essence the nil on-site affordable housing contribution means the proposal is failing to deliver basic policy requirements – the principle which justified the site being identified for development in a National Park. In the absence of affordable housing it is concluded that there are no overriding reasons to approve a proposal which may impact upon the SAC; the test of IROPI is not met.

3.6. For this fundamental reason it is considered that, in the context of the Local Plan review, it cannot be demonstrated that the allocated site BCK2/Proposal 7.6(2) (Holne Road) is deliverable.

4. The need for an alternative site

- 4.1. Taking forward the conclusion that the site cannot be now demonstrated to be deliverable, it is necessary to consider whether an alternative site is required in the local plan in order to meet identified affordable housing need.
- 4.2. Sites are allocated in the local plan in order to:
- Provide a degree of confidence and certainty that enough land is available, achievable and deliverable to meet local needs
 - To ensure that there are appropriate opportunities in the Local Centres, the most sustainable location for meeting affordable housing need
 - To ensure that the overall indicative level of housing delivery in the National Park is achievable through a mix of allocated sites and reasonable assumption of windfalls, notwithstanding the requirement to demonstrate local need at the time of application
 - Ensure there is appropriate flexibility, through the identification of enough land in the event of non-delivery
- 4.3. The Local Plan Examination Hearings included a clear focus upon the Authority's ability to demonstrate, though a mix of allocated sites and reasonable windfall assumptions, that the Local Plan can achieve its indicative level of housing delivery. For this and the above reasons, it is considered necessary that an alternative site in Buckfastleigh is identified.

5. Overview of development issues in Buckfastleigh

- 5.1. This table summarises the key points identified in Topic Paper 9: Development Sites. More detailed discussion and information, as well as the sources, can be found in the Topic Paper.

Issues	<ul style="list-style-type: none">• The South Hams SAC (Buckfastleigh Caves site) sits immediately north of Buckfastleigh, and within Buckfastleigh there are a number of sites highly sensitive to GHB foraging and movement. Surrounding area is within the Landscape Connectivity Zone and Sustenance Zone for the South Hams SAC (Greater Horseshoe Bat (GHB)).• Drainage and flooding issues in the lower town centre with flooding risk along Dean Burn and River Mardle; Critical Drainage Area across Buckfastleigh• Road and parking constraints with many narrow roads and junctions being made worse with on street and pavement parking.• The topography (eg the River Mardle valley) has led to a built form of residential areas separated rather than integrated• The town fringe is highly sensitive landscape which forms an historic gateway to the National Park.
Infrastructure	<ul style="list-style-type: none">• There is a need for recreational open space• Additional open footpaths/trails around the parish and public realm improvements including improved pedestrian connection with railway and town centre• Safe cycle connection between Buckfastleigh, Buckfast and Ashburton
Housing	<ul style="list-style-type: none">• Latest Housing Needs survey notes requirement for 38 homes (73% of which 2 bed homes)• 14 affordable homes delivered in the past 10 years (not on allocated sites)

- There is a lot of ‘hidden housing need’ in Buckfastleigh with a need for a greater mix of tenure and sizes of dwellings - in particular smaller homes of rental and shared ownership to meet the needs of downsizing and newly formed households.
- There is a need for more integration of market homes and affordable homes – as opposed to the large former Council estates which dominate some areas of Buckfastleigh.
- There is a current application for 28 homes, including 10 affordable, at Barn Park
- Major C2 care village redevelopment application has been approved in Buckfast for the Axminster Carpets site.

Table 1. Buckfastleigh: key points identified in Topic Paper 9: Development Sites

6. Site alternatives

6.1. This section describes the alternative sites available in Buckfastleigh, as identified through the Land Availability Assessment. A site west of Oaklands Park, and a site at Roundcross were considered in the Topic Paper not to be reasonable site options, for this reason (summarised below) they have therefore been discounted, and the remaining consideration of alternatives addresses land at Oaklands Road, and land at Timbers Road.

Site	LAA Ref.	Summary
W of Oaklands Park	DNP16/066	Though close to the area W of Glebelands (DNP08/009) terminating access to this site through Oaklands Park would isolate new homes and loss of playing field/potential facilities
Roundcross	DNP14/093	Development here enlarges the settlement extent and movement and green infrastructure in this area are critical, though in future reviews there may be merit in further consideration in relation to development at Holne Road.

Table 2: Discounted alternative sites

6.2. Option 1: Land at Oaklands Road, Buckfastleigh (DNP08/009)

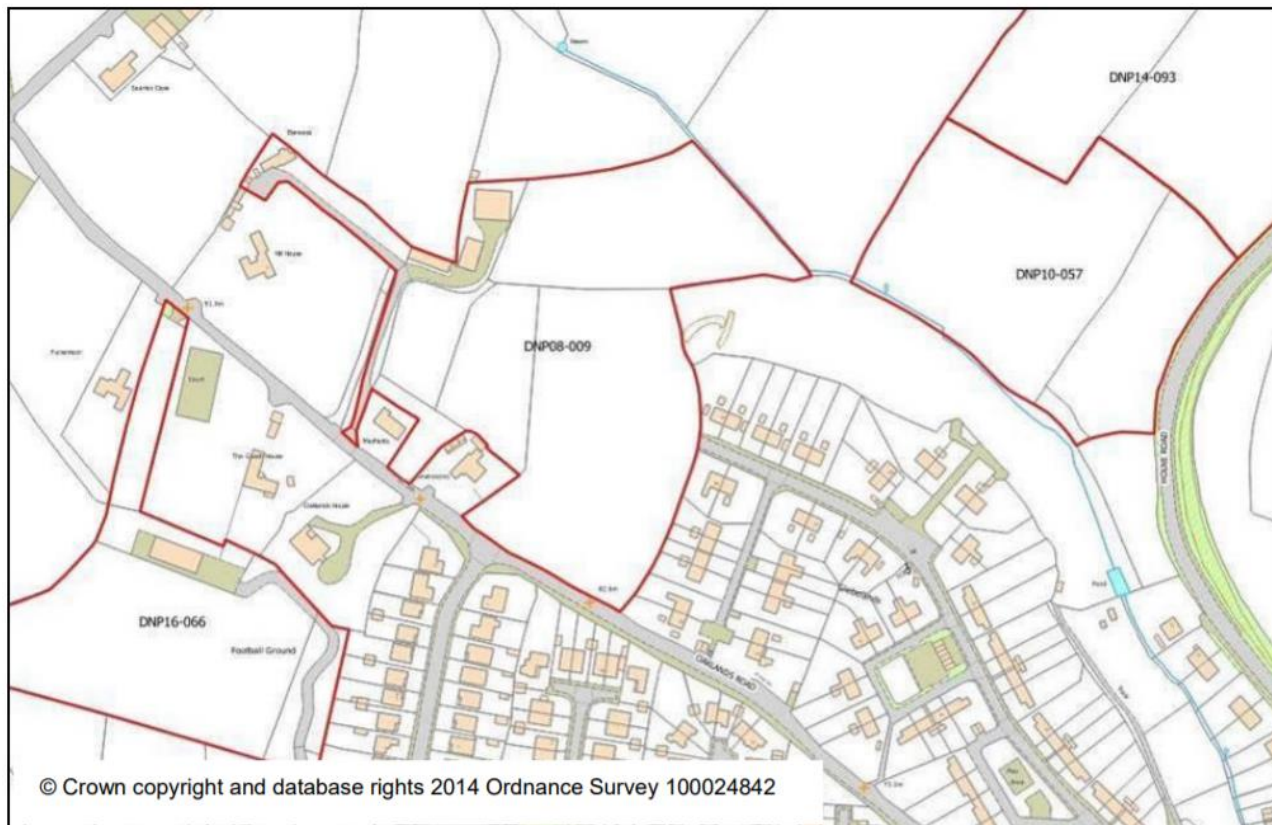


Figure 1. Land at Oaklands Road (LAA submission)

Address: Land at Oaklands Road, Buckfastleigh (SX733667)

Reference: DNP08/009

Parish: Buckfastleigh

Site Area: Whole site 2.85 ha, net developable area 1.71 ha (at 60%)

Min/Max Yield (based on LAA methodology): 34-51

Site Description: The site is located on the north western fringe of Buckfastleigh, outside but adjoining the existing built limits of this Local Centre. It is bound by the modern residential developments Glebelands to the east and Oaklands Park to the south. The site is an agricultural field that is fairly level, with an increased gradient in the northern portion, in a south to north direction. It is enclosed by mature, native hedgerows to east, south and south western boundaries, with post and rail to the north and west. The site is visible in the wider landscape especially when viewed from Holne Road. The sites proximity to the Special Area of Conservation and visibility is likely to limit development to the southern section of the site, adjacent to Oaklands Road.

6.3. **Option 2:** Timbers Rd, Buckfastleigh (Part B) DNP16/038 (n.b the summary appraisal below is with reference to parts A, B and C.

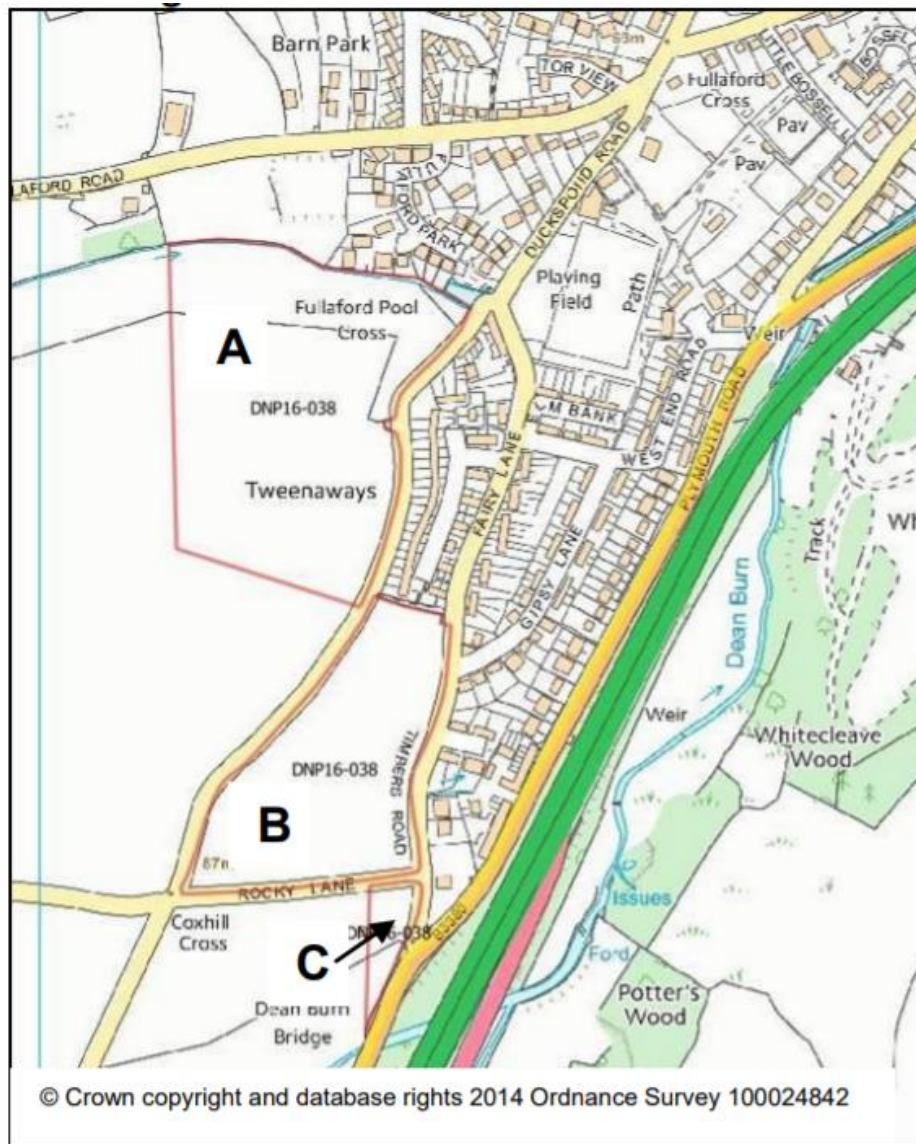


Figure 2. Land at Timbers Road (LAA submission)

Address: Land to the rear of Timbers Road, Buckfastleigh (SX733654)

Reference: DNP16/038

Parish: Dean Prior

Site Area Part B: 3.21ha

Net developable area Part B: 1.93ha (at 60%),

Min/Max Yield (based on LAA methodology) Part B: 39-58

Site Description: The sites are located to the southwest of Buckfastleigh. The three sites are currently in agricultural use. The sites are agricultural fields. The settlement boundary runs along the eastern boundaries of the sites. Plot A has some residential development, Furlong Close, on part of the northern boundary and Duckspold Close and Tweenaways on the east. The remainder of the site is surrounded by agricultural land. Duckspold road is a narrow country lane. The site is large and has challenging topography; it slopes steeply down towards Duckspold to the north. Development in the higher areas of this site will be visible from the surrounds and set in an area that is agricultural. There is a TPO area adjacent to the north eastern corner of the site. An area of surface water flooding (1 in 30 and 1 in 100) is located in the north eastern corner of the site, approximately 0.2ha.

7. Evidence: What the Sustainability Appraisal tells us

- 7.1. The SA site appraisal of Oaklands Rd and Timbers Rd sites identified the sites as having largely neutral or positive impacts and those negative issues (landscape and congestion) were relatively balanced between the sites. The biodiversity impact of the Buckfastleigh sites were more significant than other settlements, in part due to the immediate proximity of the South Hams SAC.
- 7.2. Timbers Road was considered more negative in relation to settlement pattern as it is separated from the existing homes. The Timbers Rd site being somewhat more distant from the existing town bus network was marginally less positive than the others. However, that site is the farthest site from the SAC (with only the A38 flyway being an issue). This site also has lower landscape sensitivity than the other sites considered.

8. Evidence: Placemaking

- 8.1. Buckfastleigh's settlement pattern is that of several separate residential areas with the town centre, intervening valleys, and community facilities being located in the lower areas of town.
- 8.2. The current allocation at Barn Park is closest to the town centre with the Timbers Road site being closer walking distance to the school and town centre than the Oaklands Rd area. Glebelands forms a continuation of the current development but with difficult access via Silver Street. The Oaklands Rd site would present an opportunity to create permeable access between Glebelands and Oaklands Road, though in an area of notable local traffic concerns, and addressing existing parking issues would be a key requirement of this allocation.
- 8.3. Timbers Road could provide an opportunity to create a southern gateway to the town whilst having more limited impact on the wider landscape and through traffic. Development at Timbers Road has the potential for pedestrian access on to Timbers Road, Fairy Lane and Tweenaways.

9. Evidence: Environment

- 9.1. The Oaklands Road site is approximately 500m from the South Hams SAC (Buckfastleigh Caves), the Timbers Road site is around 1km from the South Hams SAC (Buckfastleigh Caves) and both lie within the Sustainment Zone. Both would require appropriate bat survey in order to inform a Habitats Regulations Assessment, to demonstrate no impact upon the integrity of the SAC.
- 9.2. Consideration of landscape matters is set out in ED36(2) (site allocations: landscape considerations). In respect of Oaklands Road the SA states:

"landscape surrounding the settlement of Buckfastleigh has several valued attributes and qualities which includes high tranquillity levels with a strong rural quality, steep slopes of river valleys which separate Buckfast and Buckfastleigh, a pastoral character with medieval field pattern, and long views across the settlement and to the Dartmoor uplands.

Site has high landscape sensitivity.

The site is on the edge of the existing settlement and located adjacent to residential development of a modern design which is not in the historical vernacular design of the settlement. Development at these site locations is therefore not considered likely to have a significant effect on the townscape of the settlement.

Site option 009 is a large site, however it is closely located to Oaklands Park and Glebelands, an area with a slightly lower sensitivity."

9.3. In respect of Timbers Road the SA states:

“Landscape surrounding the settlement of Buckfastleigh has several valued attributes and qualities which includes high tranquillity levels with a strong rural quality, steep slopes of river valleys which separate Buckfast and Buckfastleigh, a pastoral character with medieval field pattern, and long views across the settlement and to the Dartmoor uplands

The site options (except 76) are located on the edge of the existing settlement and are located adjacent to residential development of a modern design which is not in the historical vernacular design of the settlement. Development at these site locations is therefore not considered likely to have a significant effect on the townscape of the settlement.

Site option 038 is to the south of the settlement and is pastoral in character; due to its varying topography it is visible from the surrounding area and the potential for negative effects on character”

- 9.4. There is a noted issue with surface water drainage at Rocky Lane, adjoining the Timbers Road site, which would appear to relate to run-off from adjoining agricultural land. This should be assessed as part of any proposal on this site, and an opportunity may then be available to address this local issue. The site is bounded by some mature hedgerows and trees, with an opportunity to reinforce this boundary as a new edge to the settlement whilst mitigating landscape impact.
- 9.5. The Oaklands Road site is bounded by some mature hedgerows and trees, as well as the small copse within the site. There is an opportunity to reinforce the site boundaries as a new edge to the settlement whilst mitigating the landscape impact of this more elevated site. The site’s proximity to the SAC and known commuter routes and foraging areas is likely to require on-site mitigation.

10. Evidence: Infrastructure

- 10.1. The Oaklands Road site has alternatives for site access and with Teign Housing being the adjoining landowner, subject to an integrated and responsive affordable housing offer, it is likely that options for access can be achieved. Highway access through Glebelands would increase the amount of vehicular traffic through this current cul-de-sac. A further access to Oaklands Road would add resilience to the local highway network but lead to the existing Glebelands becoming a through road. The option of a split site (part access from each road) with emergency access between could also be an option. Local concerns regarding the local highway network were raised at Sites Consultation stage.
- 10.2. Timbers Road access requires specific highways improvements in order to access from Plymouth Road. These have been scoped by the site promotor though not yet fully surveyed. Access options would be either through the adjoining agricultural land, which would require the level change at Rocky Lane to be addressed, or by widening Timbers Road (which would require fairly extensive cut/fill). Access would then be direct to the A road.
- 10.3. The servicing costs of the identified sites are not extra-ordinary, though the site at Timbers Road would require road upgrades beyond those on the development site itself. The sites appear to be able to achieve sewerage connections without pumping.
- 10.4. It should be noted that the Timbers Road site lies in South Hams district, whilst the rest of Buckfastleigh Town is in Teignbridge district. This may require a degree of cross boundary co-operation in respect of community level infrastructure (council tax related issues) and the allocation of affordable housing. However it is considered that this is not a significant factor in assessing the site options, and that the Local Plan should identify the most appropriate site in planning terms.

11. Evidence: Housing – need and site yield

- 11.1. Both sites are able to achieve equivalent or greater than the number of homes which would have been provided through the allocation of Holne Road. The site identified would come forward in response to an identified need for affordable housing and be expected to deliver not less than 45% affordable housing. Sites may potentially be phased if necessary, in order to not over-provide against affordable need and provide for a pipeline land supply further into the Plan period.

Survey/Source	Need
Housing Needs Assessment (Nov 2014)	26 (+13 within 5 yrs)
Devon Home Choice need (Mar 2021)	35 (19x1B; 6x2B; 6x3B; 4x4B)
Help to Buy need (date)	Not available

Table 3. Buckfastleigh: current housing need

Site	Developable area	Housing numbers (affordable)
Holne Road	1.0 Ha	28 (13)
Oaklands Road	1.6 Ha	44 (20)
Timbers Road	2.5 Ha	70 (32)

Table 4. Buckfastleigh: projected site housing yield

12. Timescales for delivery

- 12.1. It should be noted that an application for development at Barn Park is already within the development management process and would (subject to permission) be the next scheme delivered to meet the immediate affordable housing need.
- 12.2. Both site promoters for Oaklands Road and Timbers Road have indicated a wish/willingness to bring the site forward to meet local need without delay. The Oaklands Road site is more advanced in respect of survey work and more detailed layout plans with a proposed scheme of 51 units accessed via Glebelands. The Oaklands Road promoter submitted a Development Brief as part of the local plan consultation process, and has confirmed in writing an intention to bring the site forward immediately (subject to need) if the site were allocated.

13. Recommendations from the development sites Topic Paper (at Regulation 19)

- 13.1. The development sites topic paper summarised the merits of both sites as follows:

Address	LAA Site Ref.	Notes	Allocation?
Oaklands W of Glebelands	DNP08/009	Through access from Glebelands to Oaklands Rd could improve access. Policy should require a mix of tenures and a number of smaller dwellings within any proposal. Parking creates access constraints and development here should create sufficient, and possibly additional, parking (the latter through delivery of parking court/lockup garages).	There is some merit in allocation of this area. Policy requirements for parking and permeability, and retention of northern area to reinforce dark corridor/Bat Flyway. With allocated sites meeting local housing need this site is not required.

<p>Tweenaways /Timbers Road</p>	<p>DNP16/038</p>	<p>The southern field (described in the LAA report as parcel “B”) provides an opportunity to achieve access improvements. A small portion of the northern parcel “A” would support a modest “rounding off” development. This is the least constrained area of Buckfastleigh and with sensitive and comprehensive planning modest development could add to the local housing supply and help uplift the area. Development would require transport and pedestrian/cycle links in addition to bat mitigation and biodiversity enhancements.</p>	<p>There is some merit in allocation of this area, but with currently allocated sites likely meeting local housing need allocation of this site is not required.</p>
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Table 5. Development Sites Topic Paper – sites summary

14. Recommendations

14.1. At the Local Plan Steering Group, DNPA Members were appraised of the follow options for action in response to the refusal of the application at Holne Road.

Option	Advice
<p>1 Retain Proposal 7.6(2) in the Local Plan</p>	<p>If DNPA does not itself seek to address the non-deliverability of the site, it is likely it will be directed to by the Inspector. Not responding at this stage will therefore only lead to delay.</p>
<p>2 Modify the LP to remove Proposal 7.6(2) and take no further action</p>	<p>This is not considered a defensible option. DNPA will be unable to defend its approach to housing delivery on the evidence and reasoning used to support the submission of the Plan. It is considered a site of no less yield is needed, otherwise the LP may not be found sound.</p>
<p>3 Modify the LP to remove Proposal 7.6(2) and consider alternative sites elsewhere in the NP</p>	<p>Buckfastleigh has a consistent affordable housing need, and two reasonable and achievable alternative sites. DNPA would need robust reasons to identify a site elsewhere in the NP and not an alternative within the same Local Centre.</p>
<p>4 Modify the LP to remove Proposal 7.6(2) and identify the land at Oaklands Road in the Local Plan</p>	<p>Would be an appropriate modification, subject to weighing up the relative merits of the sites and reaching a reasoned judgement on a preferred alternative.</p>
<p>5 Modify the LP to remove Proposal 7.6(2) and identify the land at Timbers Road in the Local Plan</p>	<p>Would be an appropriate modification, subject to weighing up the relative merits of the sites and reaching a reasoned judgement on a preferred alternative.</p>
<p>6 Modify the LP to remove Proposal 7.6(2) and seek an alternative site or strategy in Buckfastleigh</p>	<p>Is unlikely to be a reasonable and appropriate approach in light of previous consultation on options, and the availability of two reasonable alternative sites. Could lead to significant delays in the LP, and without reasonable justification.</p>

Table 6. Response options

14.2. Members agreed that Options 4 or 5 (the allocation of either Oaklands Road or Timbers Road) should be explored by officers and taken forward for a decision. The Inspector subsequently provided a clear direction in respect of the requirement for an alternative site in Buckfastleigh to meet affordable housing need, further reinforcing that only Options 4 or 5 were appropriate.

14.3. The technical considerations above highlight that both sites remain available, deliverable and achievable. The merits of the sites are relatively finely balanced.

	Oaklands Road	Timbers Road
Issues	- Visible in the wider landscape - Closer to SAC - Local highways issues –	- Impact upon pastoral character - Proximity to SAC - Surface water drainage issue
Infrastructure	- Could provide parking for adjoining area - No utilities issues - Accessed through current cul-de-sac	- Requires new highway access - Access direct to A road - No utilities issues
Housing	- Would meet current need	- Would meet current and longer term need
Placemaking	- Could address highway permeability - Elevated and distant access to town centre	- Accessed with lesser impact upon wider town - Close to sports amenities - Level but distant access to town centre
Delivery	- Site immediately available - Some survey work complete – intention to progress	- Site immediately available - No survey work complete – intention to progress

Table 7. Overview of assessment

14.4. The technical work indicates that on balance the landscape impact, ecological mitigation (in respect of the SAC) and highway impact are lesser for Timbers Road. This site does require a new highway access, though this has been assessed by the Highway Officer as achievable, and considered viable on the basis of the larger site size. Whilst a greater yield it would be subject to the same requirements in respect of delivery based only upon an evidenced affordable housing need. The cross-district boundary matters are not considered to be material to the planning decision in respect of allocated the site.

14.5. In response to the issues and opportunities identified above the identification of the site should make provision for:

- a) The provision for access through the site either through the parcel of land to the north of Timbers Road, or through the improvement/widening of Timbers Road between the site and Plymouth Road. This area should be retained for access only though, and not include provision for housing development.
- b) The need for appropriate evidence in order to inform a Habitats Regulations Assessment.
- c) The need for a surface water management plan
- d) Provision in the accompanying Site Development Brief for detailed landscape guidance/mitigation.

Proposal 7.6 (3) Land at Timbers Road, Buckfastleigh

1. An area of land at Timbers Road is allocated for development:
 - a. Parcel A is allocated to provide around 70 homes, of which not less than 45% must be affordable housing to meet identified local needs.
 - b. Parcel B is allocated for the delivery of appropriate highway improvement works to access Plymouth Road.Development should come forward only in response to an identified affordable housing need.
2. Applications should be supported by evidence to inform an appropriate assessment (Habitats Regulations) in order to establish that development of this site will have no adverse impact on the South Hams Special Area of Conservation.
3. Development of this site must:
 - a. include delivery of appropriate highway improvements to achieve vehicle and pedestrian access from Plymouth Road; and
 - b. be supported by a surface water management plan which demonstrates how surface water from the proposed development and adjoining public highways will be disposed of in a manner that does not increase flood risk elsewhere.

Figure 3. Draft Allocation text

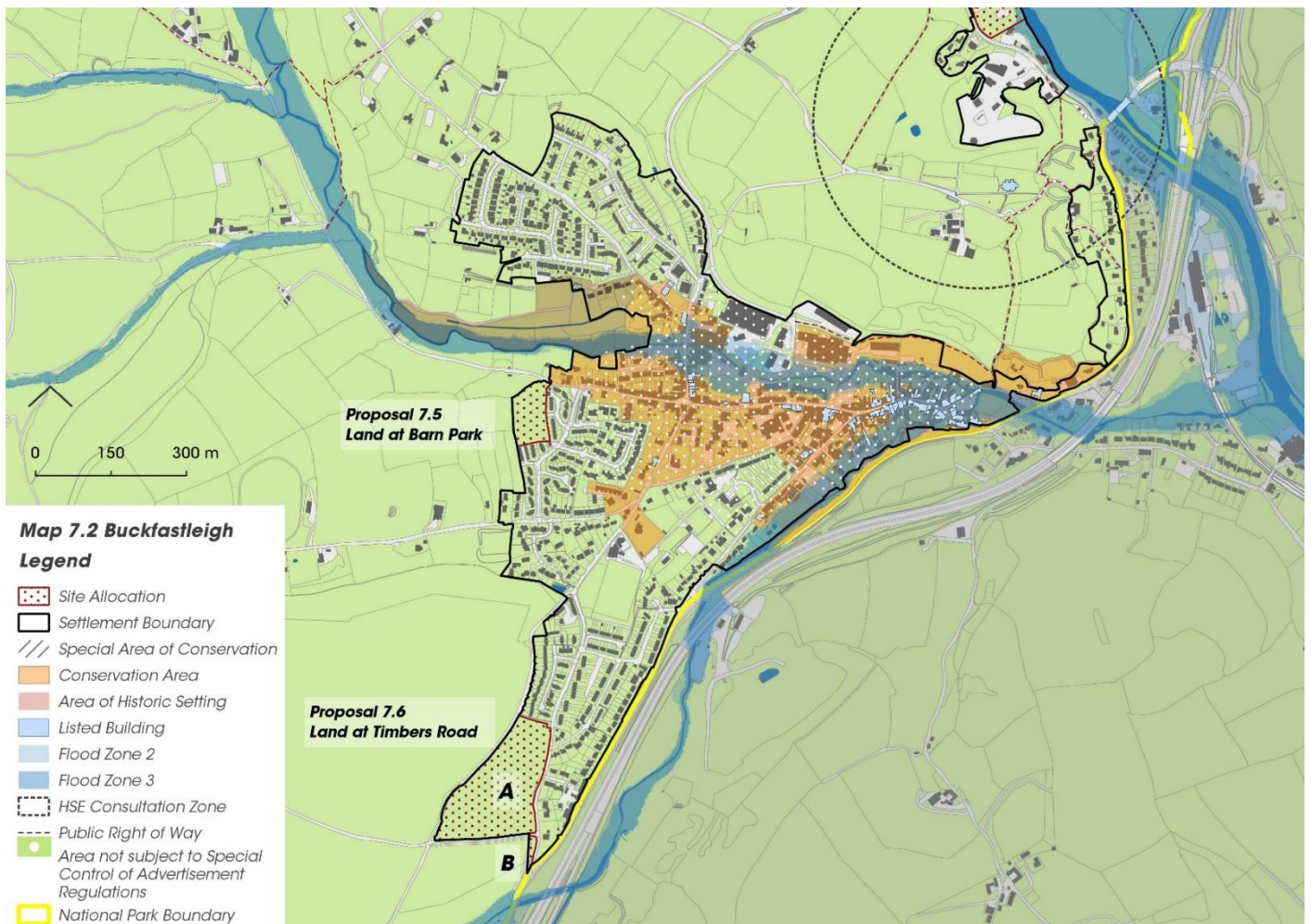


Figure 4. Proposed modified inset map for Buckfastleigh

15. Decision making process

15.1. The decision making process in considering the alternative site is as follows:

- a) A draft of this paper was provided to all Members, and discussed at the Local Plan Steering Group. The Steering Group discussed the merits of the site, in particular the highway issues and options, the environmental constraints and opportunities, yield, deliverability and cross boundary matters. Members were minded to the Timbers Road site. Officers advised they would complete the technical paper and Members could consider again in detail.
- b) Members discussed the issue at the Authority meeting (30 April) at a high level (due to the pre-election period). Noting in particular the desire to engage the local community in the consultation process. Members were advised that a further consultation period on options was not necessary/desirable, given the previous consultation on these sites both through the review process, and by the site promoters (with specific events held in the community). Members were invited to consider the matter again at the Planning Panel Meeting
- c) Planning Panel Meeting (14 May 2021). Members were presented with an overview of the issues and options, and had a broad ranging discussion around the two sites. They provided a steer that Timbers Road was the preferred site.
- d) The Sustainability Appraisal, and Viability Appraisal Screening were completed, with neither identifying new issues since the appraisal of the sites at earlier stages.
- e) Draft modifications were submitted to the Inspector. The Inspector agreed they could be published for public consultation.
- f) Agreement of Draft Proposed Modifications (delegated Authority). The Chief Executive, in consultation with the Chair and Deputy Chair agreed the final list of Proposal Modifications.
- g) Publication of this document, alongside the Modifications for public consultation
- h) (expected Aug 21) Submission of consultation responses to the Inspector, to inform her final report
- i) (expected Sep/Oct 21) Receipt of the Inspector's final report
- j) (expected Oct/Nov 21) Consideration of the Inspector's final report, and adoption by the Authority

16. Conclusion

16.1. This Paper analyses in depth the removal of Land at Holne Road from the draft Local Plan and its replacement with an alternative allocated site to meet identified local needs. It considers the available evidence and the available site options narrowing those to two reasonable alternatives. It then considers in depth the available evidence in considering the relative merits of the two sites, and describes the decision-making process DNPA has been through to date, and the remaining steps.

16.2. It concludes that on balance the Land at Timbers Road would provide the most appropriate alternative site for allocation as a Modification to the Local Plan. Drawing from the consideration of evidence it identifies specific policy provisions for a draft allocation, which, alongside a draft Site Development Brief can be taken forward for public consultation.