

Salcombe Neighbourhood Development Plan

NDP Response to Further Initial Comments of the Independent Examiner John Slater 4th March 2019

NDP Response to item 4 Regulation 16 Representations (revised)

Representation	NDP Response
Age UK	LGS 18 and 19 have been removed at the request of Age UK
Spectrum	No action required
Highways England	No action required
Martin King re SALC Env 6 V22	NDP acknowledge and accept the landowner's objection, but the NDP consider the view of the countryside as you approach the town centre from the road and footpath down Onslow Rd which is depicted by the photograph V22 is still a very important view. We would propose to relocate the view point V22 above the current position and away from the bench. The NPG consider this would be a suitable compromise that would still meet the overall objective of the view but not conflict with the wishes of the landowner.
Natural England SALC Env 5(e)	If required the NPG can include a drawing showing the location of permanent pontoons such as Batson, Whitestrand and Normandy Pontoons and Jubilee Pier.
South West Water	No action required
Westward Housing	No action required
Devon and Cornwall Police	No action required
DCC Archaeology Dept	NPG can update the plan and appendices as noted however as stated in the Basic Conditions Statement the NDP is based on the former version of the NPPF (March 2012)
Historic England	No action required
Woodland Trust	No action required
WS Planning and Architecture on behalf of Park Green SW Ltd	SALC H3; NPG do not agree with the representation and consider there is sufficient evidence to justify a Principal Requirement and can justify the level of Second Home ownership as 57.3% (see paragraph 5.4.3 of the plan and evidence base Appendix B 42.) SALC H4; see above
SHDC	
SALC Env 1 criteria f	Noted, but NPG consider the criteria appropriate and will defer to the Examiner for a final judgement
SALC Env 2 criteria b	As above
SALL Env 4	NPG consider all the designations are justified and supported by the landowners and they all contribute to the character of the town and would like them retained.
SALC B1 criteria 3	Noted, but NPG consider the introductory statement to criteria 3 appropriate and will defer to the Examiner for a final judgement.
SALC EM1	Criteria c; the NPG are concerned that the proposed change dilutes the criteria and could be exploited. This requirement to retain the existing number of car and boat parking spaces was expressed as a high priority in the community survey and is therefore reflected in the NDP.

	<p>Criteria f; NPG are concerned that the amended criteria creates far too much flexibility and would run counter to community surveys and the ambition of establishing a Local Separation Policy(SALC Env3).</p> <p>Criteria g; the type of marine trades we wish to accommodate are sometimes classified as B2 (such as glass fibre, spray painting and metalwork). Excluding these from the policy would risk precluding the marine trades that the community and business surveys (see Appendix B43 and B44) and the plan seeks to maintain and encourage for the future viability of the harbour and town.</p>
SALC H1	NPG agree to add ‘where appropriate ‘to second paragraph.
SALC H3	<p>Noted, The NPG would hope that SHDC could provide some clear robust guidance on this important and supported requirement which will apply to all communities in the District where a Principal Residence requirement may apply in the future. In the absence of this guidance NPG took advice from other Made Plans and the Health Check (see Appendix B45) for the current wording. There is some flexibility in the wording proposed to allow for more specific guidance in the future from the LPA however, the NPG will defer to the Examiner for a final judgement.</p>
SAL H4	<p>We are aware that SHDC have commented in respect of Exception sites that the JLP will suggest up to 40% open market percentage could be accepted. In Policy H4 (e) our Policy states no more than 15% of properties to be ‘open market’ vs the Council’s suggested 40%. We were motivated to propose a lower figure based (1) on advice received verbally from Thomas Jones on 11th June (see email exchange 11th/12th June recording that advice) that a ND Plan could suggest that a figure of 60% affordable could be higher and (2) on evidence that of recent open market housing developments in the town the number of homes that have ended up occupied by local people was very low (2/15 at Shadycombe Heights and 5/15 at Salcombe Rise Phase 2). This was why our Plan suggests a ratio of 15% open market to 85% affordable noting that all our survey evidence points to the fact that affordable housing is one of the Town’s most important requirements.</p> <p>There is clearly a difference of opinion between the LPA’s current view and the Town Council on criteria e) and we look to the Examiner for a final judgement. The Town Council and NPG are concerned that an exception site of up to 40% market housing on the edge of the Town in the countryside would be wholly inappropriate in Salcombe Parish , and be contrary to the spirit of the NPPF definition of Rural Exception Sites.</p>