

The Voice for Devon's Countryside

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Registered Charity No: 1175228

South Hams District Council Reference: 2247/26/FUL

Erection of 11 dwellings, Loddiswell

6th September 2026

Devon CPRE objects to this application and raises the following planning policy and design matters for further consideration before the application is determined.

The key issues are the site's status under the development plan, the application of NPPF 2026 policies, the relationship of the proposal to Loddiswell, the quality of the design response, and whether the requirements of Joint Local Plan (JLP) Policy DEV3 and NPPF 2026 Policy HC7(b) in terms of outdoor sports/recreational facilities designation have been addressed.

1. NPPF 2026 Policy S5 and settlement status

If the proposal relies on Policy S5(1)(j), the assessment should address the following matters:

- the evidenced unmet need;
- whether the development is physically well-related to an existing settlement; and
- whether 11 dwellings is an appropriate scale having regard to local infrastructure.

2. NPPF 2026 Policy DP3 and good design

In reference to Policy DP3, the scheme should be assessed against the following design considerations:

- liveability;
- climate;
- nature;
- movement and connectivity;
- built form and layout;
- quality and function of public space; and
- local identity and character.

3. National Landscape

In addition to JLP Policy DEV 25, NPPF 2026 Policy N4 requires development within Protected Landscapes to be limited in scale and extent and sensitively located and designed to avoid harm to their statutory purposes and special qualities. The policy states that substantial weight should be placed on conserving and enhancing the natural beauty of Protected Landscapes.

The Council should therefore consider the landscape effects of the overall location, layout, built form, movement pattern and relationship with the surrounding landscape, rather than relying principally upon proposed planting and landscape mitigation.

4. Previous design concerns

The Council should consider whether the revised scheme has overcome its previous concerns that:

“layout, design approach and lack of landscape strategy within the South Devon National Landscape, would fail to deliver good design;

and

“would not relate well to the existing settlement; and would fail to reinforce the character of the village”

(Planning Statement page 5).

The Landscape Officer has assessed the revised landscaping and concluded that the revised landscape treatment is broadly acceptable; but they have not demonstrated that the underlying spatial structure of the development constitutes good placemaking. The planning balance should also address whether the site is an appropriate location for housing under NPPF 2026 Policy S5, whether the layout and design satisfy NPPF 2026 Policy DP3, and whether the revised scheme overcomes the previous concern that the development failed to relate well to Loddiswell.

5. Design, Building for a Healthy Life and Placemaking

Building for a Healthy Life (BHL) 2026 provides a recognised framework for assessing placemaking and closely aligns with the NPPF 2026 Policy DP3 criteria for well-designed places. It provides a useful basis for considering whether the scheme responds to its context, creates a coherent street scene, supports movement and connectivity, and provides meaningful public space. There are several points to raise in relation to this scheme including:

Plot-driven layout

The layout appears to be substantially plot-driven. A series of house types is arranged along a central road, with parking inserted around them.

BHL 6 warns against allowing pre-set house types to dictate the layout, rather than allowing the site and placemaking objectives to shape the arrangement. It also cautions against arranging buildings without regard to the street scene.

This point is important considering the application history. Although the applicant has amended the layout, the Council should consider whether the revised design is shaped by the character and function of this part of Loddiswell, rather than by the arrangement of standard house types.

Local identity and character

The use of local materials is helpful, but local identity is not determined by materials alone. It also depends on the arrangement of buildings, street composition, views, landscape setting, building rhythm and the spaces between buildings.

Purpose and function of public open space

The public open space should have a clear purpose. At present, it appears to perform several roles, but perhaps none particularly strongly. The application should clarify whether it is intended primarily as:

- visual mitigation;
- ecological land;
- recreational space; and
- social space.

BHL also emphasises that open spaces should have a clear purpose, be well overlooked and perform a meaningful function within the wider layout.

This leads to the related question of loss of outdoor sports facilities and whether the application site remains protected under Policy DEV3 and NPPF 2026 Policy HC7(b)

6. Outdoor Sports Facilities Designation

NPPF 2026 Policy HC7(b) is relevant in this case. It resists the loss of existing open space, sports and recreational land, including playing fields, unless the land is surplus to requirements or the loss is replaced by equivalent or better provision with comparable or improved accessibility for the community it serves.

This should be considered alongside JLP Policy DEV3, particularly as the application site is identified as “**Outdoor Sports Facilities**” on the adopted Joint Local Plan Policies Map (see Figure 2 below).

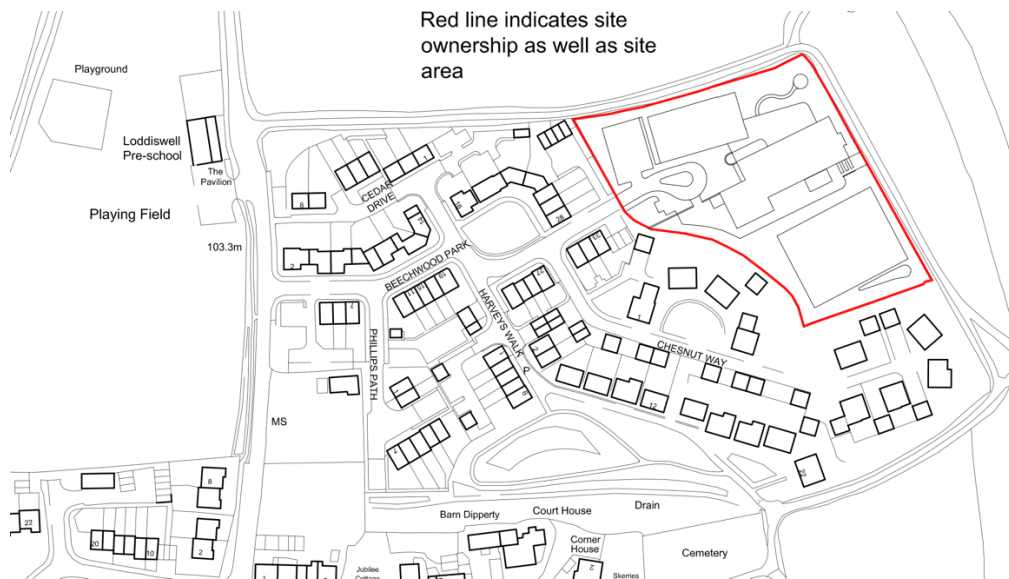
“No concern was raised due to the perceived loss of playing fields as they have already been provided at the school. This has been confirmed in the pre-Council that has been endorsed by Sport England”

(Planning Statement, p.23)

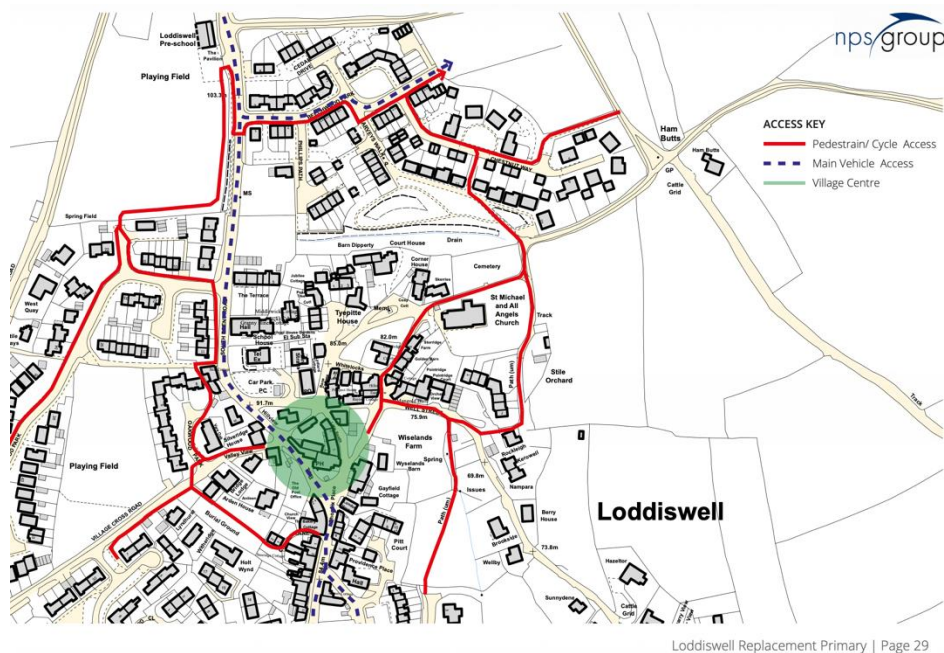
Devon CPRE suggest that there are three matters that require clarification:

- the precise playing field lost?
- the provision said to replace it?
- the planning mechanism/evidence that connects the two for the purposes of NPPF Policy HC7(b) and JLP Policy DEV 3.

There is uncertainty as to which playing field the claimed replacement provision relates to. The delegated report for the new school, DCC/3920/2016, identifies the former playing field separately from the new school site, however, provides very little reference to the precise location of the field in associated material. The only plan submitted in relation to application DCC/3920/2016 which appears to show a remote playing field is the location plan (shown in Map Extract 1 below), with the Design and Access Statement (Map Extract 2) showing our site as a playing field together with pedestrian access into the playing field adjoining Loddiswell Pre-school.



Map Extract 1: Location plan showing the new school site and separate playing field.



Map Extract 2: Design and Access Statement showing pedestrian access in red and the location of two named playing fields.

In addition, the application relies upon the playing-field provision associated with the replacement primary school as replacement for the former playing field now proposed for residential development. However, both NPPF 2026 Policy HC7(b) and Sport England Playing Fields Policy Exception E4 refer specifically to the **loss resulting from the proposed development**.

HC7(b) requires that:

“The loss resulting from the proposed development would be replaced...”

Similarly, Exception E4 requires:

“The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development...”

The chronology is therefore material. The replacement primary school and its associated sports provision were provided in 2017/18, several years before the present residential proposal. The new playing field was therefore already in existence independently of the current development.

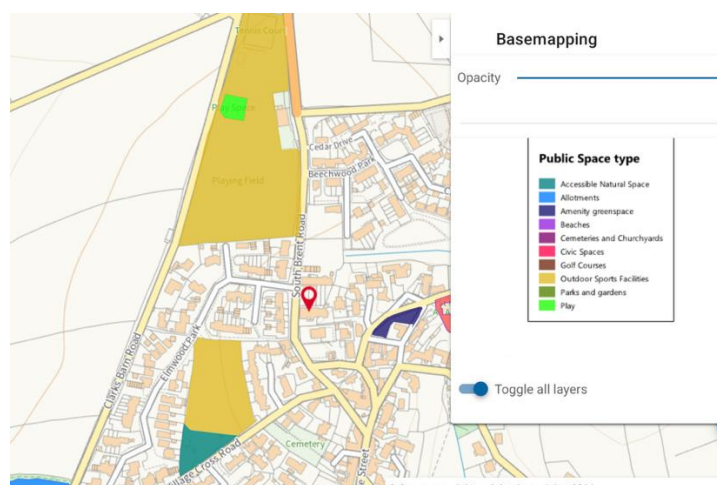
The Council should therefore establish the planning basis upon which this existing provision can properly be regarded as the replacement for the playing-field loss resulting from the present residential development. It should identify whether the 2017 school permission or any associated planning agreement expressly established the new playing field as replacement provision for the specific playing-field land now proposed for development.

This question is particularly relevant because the Sport England consultation response to the replacement school application does not appear to have undertaken a substantive assessment of the subsequent loss of the detached playing field. Instead, it stated:

“the new school could end up providing better quality playing fields than the detached site proposed to be lost to housing.”

The information submitted with the current application does not conclusively establish that the sports provision at the new school was specifically provided as replacement for the playing field that forms part of the current application site.

Furthermore, the application site remains designated as **“Outdoor Sports Facilities”** on the adopted Joint Local Plan Policies Map (as shown in Map Extract 2 below).



Map Extract 2: Joint Local Plan Policies Map designation for the application site.

The replacement primary school and its associated facilities were approved in 2017, whereas the JLP was adopted in 2019. The current designation therefore post-dates the school approval.

The replacement playing field at the new school appears to have been provided independently of the present residential proposal and before the current application was made. Further evidence is therefore required to establish that the existing school sports provision was in fact provided and accepted as replacement provision for the specific playing-field loss now arising from this development.

The Council should identify the agreement, planning condition, planning obligation or other mechanism by which the new school's sports provision was established or accepted as replacement provision for the application site. This is necessary to demonstrate how the requirements of JLP Policy DEV3 and NPPF 2026 Policy HC7(b) are met in relation to the specific loss arising from the current proposal.

Conclusion

In summary, the Council should address the fundamental question of how the 2017 school playing field can properly be regarded as replacement for a loss resulting from the 2026 residential development when that playing field was already provided, independently of that development, several years before the development proposal existed.

Finally, the separate question of additional recreational demand arising from the proposed 11 dwellings should also be addressed before the application is determined.