

**PLYMOUTH AND SOUTH WEST DEVON SUPPLEMENTARY
PLANNING DOCUMENT**

Consultation Response Report

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INTRODUCTION

1. In March 2019 the Plymouth and South West Devon Joint Local Plan (JLP) was adopted by the three JLP authorities: Plymouth City Council (PCC) South Hams District Council (SHDC) and West Devon Borough Council (WDBC). To support the implementation of the JLP, a new Plymouth and South West Devon Supplementary Planning Document (SPD) was needed to add further detail and guidance to its policies. Once adopted, the SPD will be a material planning consideration when making planning decisions and will supersede the previously adopted SPDs across the JLP area. The SPD continues the joint working undertaken by the JLP authorities.
2. This document sets out the representations received during the public consultation on the draft SPD which ran from 13 November 2019 to 5pm on Monday 6 January 2020.
3. PCC, SHDC and WDBC asked for comments on three documents which were out for consultation:
 - Plymouth and South West Devon Supplementary Planning Document (SPD)
 - Developer Contributions Evidence Base – which informs Section 12 (Planning obligations, conditions, the Community Infrastructure Levy and development viability) of the SPD. It presents methodologies used to calculate the value of developer contributions, in particular via planning obligations, required to mitigate the impacts of new development proposals on key infrastructure provision.
 - Traditional Farm Buildings: Their adaptation and re-use (Barn Guide) – which aids developers looking to adapt or re-use traditional farm buildings which are common in rural areas.
4. Representations were received from residents, statutory consultees, special interest groups, developers, landowners and from businesses. In total, 519 comments were made by 115 consultees. Of the comments:
 - 508 comments were made by 112 consultees on the SPD
 - 8 comments were made by 4 consultees on the Developer Contribution Evidence Base
 - 3 comments were made by 3 consultees on the Barn Guide
 - 45 comments were late
5. To view a summary of the comments received and the LPAs' responses please see:
 - APPENDIX I for the comments on the SPD
 - APPENDIX II for the comments on the Developer Contributions Evidence Base
 - APPENDIX III for the comments on the Barn Guide

AIM OF THE CONSULTATION

6. A consultation statement was produced and was available for information only. This document set out the JLP authorities approach to engagement on both the draft SPD and the draft Statement of Community Involvement (SCI) which was also out for consultation during this time.
7. The aim of the SPD consultation was to seek views on the effectiveness of the guidance set out within the SPD, the Developer Contributions Evidence Base and the Barn Guide on being able to implement the policies of the JLP. The consultation provided an opportunity to set out whether consultees agreed with the guidance, and if not, were invited to suggest changes to the documents.
8. A change was considered and made to the documents if an error was spotted by officers or if officers deemed that a representation:

- Resulted in a significant improvement to the clarity of the documents;
 - Introduced a more appropriate way of interpreting delivery of the JLP;
 - Persuaded officers that the change was valid and addressed an issue which, on reflection, warranted a change; and/or,
 - Corrected erroneous or unclear text.
9. All comments were considered and the SPD, Developer Contribution Evidence Base and Barn Guide have all been updated to reflect this. Details as to which comments resulted in a change to each document is indicated in the response to the comments. Below is a bullet-point summary of the most significant changes to the SPD:
- Incorporation of provisions to protect student welfare in Purpose Built Student Accommodation, particularly in the context of dual use proposals;
 - Additional references added re. the role of Devon County Council as Minerals and Waste Planning Authority;
 - Additional references added re. the historic environment;
 - Affordable Housing tenure mix wording amended to make it clearer that the proposed percentage split is the start of negotiations;
 - Reduction in the amount of time an employment site needs to be marketed before a change of use application is submitted;
 - Amendments made to update guidance on Biodiversity Net Gain;
 - References added to the National Design Guide;
 - Amendments to guidance at DEV32 to ensure the implementation of low carbon development is more effective by clarifying the process of which the assessment on the impacts of those developments on carbon is undertaken;
 - Additional guidance added re. air quality including detail on agricultural development and its effect on air quality and reference to national guidance as a benchmark to assess costs of damage caused by emissions;
 - Amendments made to waste standards to bring this into line with other policy;
 - Removal of specified development size when the LPAs will seek the provision of communal electrical vehicle (EV) charging facilities so it can be considered on a case by case basis;
 - Improved clarity given on the provisions on relation to tall buildings in the City Centre;
 - The majority of changes proposed are in relation to the TTV Policy Area and the provision of housing in relation to allocations and the evidence needed for matters such as local need, replacement dwellings and extensions.
10. Originally it was scheduled that the SPD would be adopted in March 2020, however, due to the amount of representations received and to allow adequate time for officers to consider each comment raised and to address the complexity of some of the issues raised, it was agreed to postpone this until Summer 2020 to allow officers across the three authorities enough time to adequately address the representations received.

HOW WAS THE CONSULTATION ADVERTISED?

11. Whilst each JLP authority produced their own material to promote the consultation, common language and the JLP branding was used. During the consultation:
- Banners advertising the consultation were put on the three corporate websites.
 - 9,383 e-newsletters were sent out across the three JLP authorities via gov. delivery.
 - The consultation was promoted via social media.
 - E-mails were sent to specialist groups.
 - 2,308 letters were sent out to all on the JLP consultation database who had signed up to be kept up to date with planning news but do not have e-mail addresses.
 - Posters advertising the consultation were displayed in all libraries and in First Stop in Plymouth.
 - Due to the detailed and technical nature of the consultation no events were planned, however officers were available to attend specific meetings on request as and when appropriate.

WHAT HAPPENS NEXT?

12. The revised SPD, Developer Contributions Evidence Base and Barn Guide will be recommend for adoption across the three JLP authorities. Only when the final council has made its decision will the documents be officially adopted and supersede all currently adopted SPDs across the three JLP authorities.

APPENDIX I: SUMMARIES OF AND RESPONSES TO THE COMMENTS RECEIVED ON THE SPD

Consultee ID	Comment ID	Full Name (Agent)	Company / Organisation (Agent)	Full Name (Consultee)	Company / Organisation (Consultee)	Document section	Comment summary	Summary statement	Detailed response
366574	3	Mr Chris Thomas	Outdoor Advertising Consultants	Mr Chris Thomas	British Sign and Graphics Association	APPENDIX 3: Shop fronts, including ATMs	<p>Para 15.3 - Assumes "corporate" designs should always be adapted and modified to suit the character of the building and/or location but is not necessarily so. Suggests alternative wording.</p> <p>Para 15.12 and following, the statement that "interior signage that can be seen from the highway may require permission" is incorrect. All references below to what "should" be done can only be advisory and the text should be clearer.</p> <p>Para 15.17 is incorrect. A condition on a planning permission may not deny the deemed consent provisions given generally in the Advertisements Regulations and any such condition would be ultra vires. Paragraph should be deleted or re-worded to make clear that this is advice only.</p> <p>Para 15.35, the statement that "uPVC will not be acceptable on shop fronts of listed buildings, or in conservation areas" is unduly restrictive and depends on the character of the shop front and building. Suggests alternative wording.</p> <p>Para 15.40, the second bullet point fails to take account of innovation in sign design. No recognition that LED illumination is increasingly prevalent for shopfront sign displays. Suggests alternative wording.</p>	Change to be made in part	Officers agree to amend para. 15.3 and 15.40 and to delete 15.12 and 15.17. Para 15.35 – officers believe this paragraph should remain. UPVC is generally considered to be inappropriate when considering listed buildings in particular.
368081	6			Mr Graham Clark	Sunnybanks Estates Ltd	Affordable Housing (DEV7-DEV9)	<p>The SPD is inconsistent with the revised NPPF (para 63) and does not address this definition in terms of its impact upon the threshold for on-site affordable housing. There should be a statement which reconciles the change from 10 units to 9 units in the threshold, together with the site size and floor space thresholds. The NPPF overrides the JLP and the SPD should recognise the issue. It will affect paragraphs 4.75 (PPA), 4.77 (TTV) and 4.78 (TTV).</p> <p>If a site is in excess of 0.5ha or has a floor space of 1,000m², but is 9 dwellings or less there is no indication as to how any off-site contribution for affordable housing will be calculated.</p> <p>Paragraphs 4.23 – 4.29 refers to '5 units or over'. This is inconsistent with the Rural Designation definition of 'over 5 units'.</p>	Change to be made	Changes made to more accurately reflect the NPPF definition and wording. 4.77 has been updated with a clearer link to 4.111.
438395	246			Mrs Nicola Daniel	Plymouth Community Homes	Affordable Housing (DEV7-DEV9) - Affordable housing thresholds in the Plan Area	The LPA is adopting an approach to rounding up on accessible housing. Is this approach being applied to calculating affordable housing numbers delivered onsite?	Change to be made	Noted and text amended to create clarity. The preferred approach for accessible housing policy is to round up fractions to whole dwellings, but on affordable housing delivery the fraction should be delivered as a financial contribution.
438395	247			Mrs Nicola Daniel	Plymouth Community Homes	Affordable Housing (DEV7-DEV9) - Affordable Private Rent in the Plan Area	Useful to include a cross-reference to Build to Rent guidance at paragraph 4.89.	Change to be made	Agree to add link to improve legibility.
438395	248			Mrs Nicola Daniel	Plymouth Community Homes	Affordable Housing (DEV7-DEV9) - Delivery and future	4.106 - it would be helpful to clarify that this is linked to "planning gain" dwellings.	Change to be made	Agree to add additional wording to clarify the precise meaning.

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						control in the Plan Area			
438395	249			Mrs Nicola Daniel	Plymouth Community Homes	DEV10.3 – Affordable housing design considerations in the Plan Area	To support the usability of the document, should reference be made that these design requirements are in addition to general housing design requirements. Links to supporting sections/elements would be helpful (parking, amenity space etc).	Change to be made	Agree to add reference that the design requirements are in additional to general housing design requirements.
438395	245			Mrs Nicola Daniel	Plymouth Community Homes	DEV8.1 – Overall housing mix	4.18 - support the intention, but want to ensure that the guidance is applied flexibly to support schemes that do meet housing need. The example states that on schemes where the no. of large 3bd bed properties, exceeds the no. of smaller 3 bed properties the proposal will not be supported. Needs to be flexibility to allow for holistic consideration of the housing offer proposed rather than discrete, individual elements as the wording of the guidance suggests.	Change to be made	Officers agree, paragraph to be deleted.
464465	208			Mr Edward Persse	EJFP Planning Ltd	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	As above regarding housing mix and evidence base. High value areas were considered during the examination of the JLP and removed from the draft plan.
464465	201			Mr Edward Persse	EJFP Planning Ltd	TTV2.5 – Sustainable rural tourism and leisure developments	Objects to the perceived impact on rural tourism facilities.	No change	The SPD cannot re-write the spatial strategy for the JLP. The preferred strategy for directing new development towards the most sustainable settlements was considered against all reasonable alternatives through the Sustainability Appraisal process, and was considered as part of the JLP examination. The preferred approach was found sound, and has since been given further credence by the declaration of climate emergency by all the councils. Policies within the JLP are supportive of appropriately located tourism development, which can contribute to a sustainable pattern of development. Appeal decision APP/K1128/W/18/3217159 (Lower Leigh Farm) was clear that it is no longer acceptable to be creating new tourism facilities in locations that rely solely upon the car, and have no access to local services and facilities.
464465	203			Mr Edward Persse	EJFP Planning Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
487799	410			Mr Dennis Silverwood	Tamerton Foliot Village Conservation Society	APPENDIX 5: New work in conservation areas	The representation suggests that the guidance within the appendix could be amended to discuss the appropriateness of 'new development' rather than concentrating on 'no development'.	No change	Whilst officers welcome the feedback contained within the representation it is the officer view that the 'appropriateness of new development' is covered within the Appendix.
487799	407			Mr Dennis Silverwood	Tamerton Foliot Village Conservation Society	DEV21.3 – Non-designated heritage assets (NDHAs)	Suggests addition to the NDHA guidance	No change	Non-Designated Heritage Assets could be identified on a formal Local List but not on an informal 'locally compiled register'.
487799	408			Mr Dennis Silverwood	Tamerton Foliot Village	DEV23.6 – Landscape and Visual Impact Assessment (LVIA)	Table 16 indicates that developments of less than 10 houses in the Urban Fringe and on greenfield sites do not require	Change to be made	Agree to amend the table to include the requirement for an LVIA which will be judged on a case-by-case basis.

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					Conservation Society		an LVIA. Recommend that the table is amended to show it as a requirement.		
487799	409			Mr Dennis Silverwood	Tamerton Foliot Village Conservation Society	DEV27.2 – Open spaces, including designated City Green Space and Neighbourhood Green Space	The heading (and therefore explicitly) the discussion then refers only to Neighbourhood Green Space. Recommend change heading OR include separate discussion of City Green Space.	Change to be made	Sub-heading to be altered to state: 'City and Neighbourhood Green Spaces'.
487799	406			Mr Dennis Silverwood	Tamerton Foliot Village Conservation Society	DEV3.3 – Public rights of way and bridleways	3.94 and 3.95 refer only to the provision of PROW in conjunction with (private) developments. Nowhere is there a reference to development and maintenance of existing footpaths. This omission was raised at the JLP enquiry and a response was given that it was part and parcel of working practice and a policy item was not needed. Recommend that the opportunity is taken to provide a policy statement (DEV27 with a cross reference from DEV3) which gives weight to such initiatives.	No change	The SPD is concerned with developer obligations and the LPA's expectations for schemes put forward. The development and management of the existing PROW network is a separate function supported by revenue funding. This is a statutory duty placed on the highway authority which over-rides policy aims.
516021	403	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH WEST LTD, Southern Properties	Affordable Housing (DEV7-DEV9)	The SPD looks to introduce a tenure split for affordable mix (para 4.80), alongside additional policy tests. The SPD (paragraph 4.84) also sets out additional affordable housing tenure requirements in the Plan Area, including the need for additional evidence to be provided as part of applications, which is not currently set out in policy. Paragraph 4.95 also states that "the affordable housing offer should also be a representative mix of the type and size (in terms of number of bedrooms) of the overall dwelling mix" which strays beyond the requirements of policy DEV10 which specifically relates to design considerations in the delivery of high-quality housing, and flies in the face of policies DEV7 and DEV8 in particular which make it clear that affordable housing should meet identified need.	Change to be made in part	The wording for guidance on affordable housing tenure mix is for guidance only and to be used as a starting point for negotiation. However, officers have agreed to amend the wording so this is made clearer. With regards to paragraph 4.95, this is not agreed and officers consider that guidance at 4.95 does allow negotiation with a developer on the precise mix on a case by case basis in order to meet housing need where needed.
516021	400	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH WEST LTD, Southern Properties	DEV2.1 and DEV2.3 – Water	DEV2 does not mention water quantity whereas the wording (at paragraph 3.29) introduces a new policy test that is not set out in Policy DEV2.	No change	DEV2 states that a development will be unacceptable if "Development proposals which will cause unacceptable on- or off-site risk or harm to human health, the natural environment or living conditions, either individually or cumulatively, will not be permitted." If a development has a negative impact on the quantity of water supply for existing properties then it would fail to meet this test.
516021	401	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH	DEV3.2 - Water and waterside access	Concern that guidance at DEV3.2 adds a new 'waterside access test'.	No change	Guidance at DEV3.2 is a clarification that water/waterside access are part of the Sport and Recreation focus of DEV3, well referenced in JLP paragraph 6.12 and in the Sports and Leisure Facilities Plan referred to in JLP at paragraph 6.13. For example, an identified need in the Sports and Leisure Facilities Plan is to: (Recognise, protect and enhance) Access to the Water - through publicly accessible slipways and activities.

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					WEST LTD, Southern Properties				
516021	399	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH WEST LTD, Southern Properties	General	The SPD introduces new policy tests and seeks to move policy towards a 'nil impact' objective (post mitigation). This is an unobtainable nirvana (if identified needs are to be met). The proposed guidance reads as a lengthy checklist, and there is concern that much of what is now presented as guidance will be interpreted as new policy. Many statements are development management policies. Much of the proposed 'guidance' simply seeks to introduce additional 'policy tests' to broaden those policies that are already contained in the JLP. Concern is exacerbated by the fact that much of the policy wording is written in absolutist terms. Not enough time and space allowed for a full and detailed explanation of all examples.	No change	Officers do not believe that the SPD is introducing new policy. The consultation process followed is in line with national guidance and the current Statement of Community Involvement.
516021	402	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH WEST LTD, Southern Properties	Housing (DEV7-DEV13)	The approach set out for DEV7 needs to stress that this is an area wide policy, and reference to local needs has to be interpreted on that basis. SHMA is only one data source, and it is not a dynamic one. DEV8 - Paragraphs 4.10-4.19 sets out a 'settlement local' approach to 'rebalancing' the demographic profile, by meeting a bedroom specific view of the needs and introduces size standards (paragraph 4.18). Both are re-writing policy.	No change	Officers note the comments on the difference between housing needs and demands, however do not consider that the wording of the SPD should be amended as a result. Policy DEV8 already states that proposals may be required to redress the mix of housing where an imbalance exists, and also advocates the use of 'local housing evidence' to support this. The SHMNA is the most up-to-date and appropriate evidence base document regarding housing mix, and this uses number of bedrooms as a metric for house size. As such the SPD is entirely consistent with the wording already adopted in policy.
516021	404	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH WEST LTD, Southern Properties	Specific provisions relating to transport (DEV29)	Document is seeking to introduce new development management policies which are intended to guide the determination of applications for planning permission.	No change	Providing garages of larger dimensions is more likely to lead to garages being used for their intended purpose as existing garages are often considered to be too small. Here it is only stated that the parking standards are indicative in terms of numbers of spaces - the dimensions of car parking spaces/garages would be a requirement.
658611	364			Marcus Salmon	Environment Agency	Coastal Change Management Areas (DEV36)	Presently policy DEV36 is presented on the policies map as a simple linear constraint. The SPD should provide clarity on the inland extent of the CCMA's and should be informed by information set out in the SMP such as erosion maps and future flood extents. It should also be noted that the SMPs are in the process of being refreshed and guidance in respect of CCMA's is changing. As a result the evidence base such as maps will be updated.	No change	Subsequent conversations have been had between EA and officers and no specific amendments are deemed necessary.
658611	354			Marcus Salmon	Environment Agency	DEV2.1 and DEV2.3 – Water	Paragraph 3.29 - why is this only limited to impacts on water supplies whilst the policy requires that development should 'prevent deterioration of and where appropriate protect,	Change to be made	Additional detail added re. protecting water quality.

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							enhance and restore water quality'? We support the need for evidence to be submitted where development is identified as having an unacceptable impact on private water supplies, but it would be useful if the SPD set out what sort of evidence, as a minimum, it would be looking for in these circumstances.		
658611	358			Marcus Salmon	Environment Agency	DEV35.2 – Exception Test	Paragraphs 9.74 to 9.75 should include a link to the relevant guidance within the NPPG. The guidance in the PPG regarding the application of the second part of the Exception Test (i.e. that development should be safe over its lifetime, without increasing flood risk elsewhere and where possible reduces flood risk overall) is comprehensive. It would be useful if the SPD included guidance on the first part of the Exception Test.	Change to be made	Link to be added and additional detail re. statutory requirements of PCC to align with DCC approach.
658611	359			Marcus Salmon	Environment Agency	DEV35.2 and DEV35.7 – Flood Risk Assessment/Drainage Strategy requirements	SPD could include links to the PPG and guidance on GOV.UK for applicants preparing FRAs in paragraphs 9.76 and 9.81. Disagrees with the design level in para 9.76 and 9.92 for coastal flooding and must also include allowance for wave action. Recommends agents and applicants confirming design flood levels prior to submitting their FRAs.	Change to be made	Link to the NPPG to be added. The EA has agreed with a joint approach to determining suitable flood defence levels.
658611	360			Marcus Salmon	Environment Agency	DEV35.3 – Flood Zones 2 and 3	Recommends paragraph 9.82 and 9.83 has a link to definition of a flood zone in PPG. Helpful if SPD has a description of functional floodplain (flood zone 3b) as PPG definition has been interpreted differently in SFRA by different councils. Starting point for Sequential Test would be the flood map and also informed by councils' Level 2 SFRA and surface water flooding maps.	No change	Extracts from EA Flood Zone mapping are included in the LLFA Planning consultations and further background information and guidance is included with the LFRMS.
658611	361			Marcus Salmon	Environment Agency	DEV35.4 – Surface water drainage hierarchy	Recommends inserting link to latest guidance on climate change allowances https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances	Change to be made	Link to be inserted.
658611	362			Marcus Salmon	Environment Agency	DEV35.4 – Sustainable Drainage Systems (SuDS)	Paragraph 9.93 to 9.98 recommends section refers to drainage guidance for DCC and other critical drainage areas across JLP area. Should be noted SUDS are not acceptable in flood zone 3 (unless in a defended area or buried underground). Local circumstances should be reflected, after consultation with the Environment Agency and Lead Local Flood Authorities.	No change	The reference to DCC guidance, particularly with regard to SUDS, is already included in the LFRMS.
658611	357			Marcus Salmon	Environment Agency	Green and play spaces (DEV27)	Pleased that policy DEV27 seeks to ensure delivery and maintenance of multifunctional open spaces across the JLP area. Benefits in paragraph 7.108 are clear. Clarification needed why table 20 does not include 'beaches' within the PPA. There are designated bathing water beaches within the area which should be included.	No change	The typologies within table 20 are based on the Plymouth Open Space Assessment, which did not recognise beaches in their own right and formed the evidence base for JLP policy DEV27; however these spaces have been included within the other typologies. Therefore for consistency we have opted not to include beaches as a separate green space typology.
658611	365			Marcus Salmon	Environment Agency	Improving Plymouth's city centre (PLY6)	Recommends paragraph 10.4 includes reference to needing to separate surface water from combined sewer in the city centre so it can provide capacity for foul water drainage, reduce risk of sewer flooding and protect water quality.	Change to be made	The PCC LFRMS identifies the need to separate surface water from combined sewer in the city centre. Removal of surface water from the combined sewer system will help provide capacity for foul water drainage associated with proposed growth, will help to

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							Public realm changes and updates will provide opportunity to incorporate this,		reduce the risk of sewer flooding and will help protect water quality in the waters around the city.
658611	363			Marcus Salmon	Environment Agency	Managing flood risk and water quality impacts (DEV35)	No current guidance to support policy DEV35 sequential testing which is an essential tool to planners. Recommends inserting link to PPG guidance 'sequential test for applicants available at https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants . Recommends also inserting flow chart/diagram as a guide to help planners/applicants through the application. Helpful if SPD provides guidance on DEV35.6 (Coastal squeeze), DEV35.8 (foul drainage), DEV35.9 (developer contributions).	Change to be made	Link to be added to paragraph 9.74, to the guidance in the PPG and the guidance on 'the sequential test of applicants'. Officers do not believe it's necessary to include additional guidance as this is covered by government policy guidance.
658611	366			Marcus Salmon	Environment Agency	Planning obligations, the Community Infrastructure Levy and development viability	12.34 - fluvial and surface water flood risk management measures be added.	Change to be made	Agree to add.
658611	356			Marcus Salmon	Environment Agency	Protecting and enhancing biodiversity and geological conservation (DEV26)	Generally supportive of DEV26, makes some suggestions for improvement including to reflect that on-site compensation and enhancement may not always be more beneficial than offsite (e.g. by restoring corridors and stepping stones for wildlife).	Change to be made in part	Priority habitats are not 'designated sites' in the hierarchy sense as they are dealt with by DEV26.2 and 26.3. Hence why they are covered separately (DEV26.4) with their own level of protection and considerations. Paragraph 7.72 - after 'practicable' add 'or most beneficial for biodiversity'
658611	355			Marcus Salmon	Environment Agency	Undeveloped Coast and Heritage Coast (DEV24)	7.32 - much of the area currently designated as Undeveloped Coast in the JLP is identified within the Shoreline Management Plan (SMP) as having a policy of No Active Intervention. As such new coastal defences in these areas are unlikely to gain public funding for construction or ongoing maintenance. Pleased to see clarification that development in coastal locations should consider a 'whole-life position' particularly in areas identified as subject to coastal change. Should not just be limited to the few Coastal Change Management Areas designated by DEV36 but also include parts of the coast for which the SMP recommends a policy of No Active Intervention.	No change	Subsequent conversations have been had with between EA and officers and no specific amendments are deemed necessary.
864196	250	Leonie Stoate	Tetlow King Planning		South West HARP Planning Consortium	Affordable Housing (DEV7-DEV9)	Welcome reference to the most up to date definition of affordable housing. The SHMA referred to is out of date as it predates the revised NPPF and requires a review in order to understand local needs in relation to the new definition of affordable housing. This will impact on the types and mix of affordable housing that the Councils can seek and prioritise.	No change	The SHMA was an evidence base document for the JLP, when we update/review the JLP we will update the SHMNA. Officers are satisfied that the SPD is guidance which complies with the revised NPPF.
864196	251	Leonie Stoate	Tetlow King Planning		South West HARP Planning Consortium	Affordable Housing (DEV7-DEV9) - Affordable Housing tenure mix	The SPD looks to introduce a tenure split for affordable mix (para 4.80) which isn't in the JLP or SHMA. Also at paragraph 4.89 which requires that 20 per cent of dwellings should be provided as affordable private rent. These references should be deleted and put forward in a review of the JLP.	Change to be made in part	The wording for guidance on affordable housing tenure mix is for guidance only and to be used as a starting point for negotiation. However, officers have agreed to amend the wording so this is made clearer.

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864196	252	Leonie Stoate	Tetlow King Planning		South West HARP Planning Consortium	Affordable Housing (DEV7-DEV9) - Perpetuity	The SPD makes numerous references to the need for affordable housing to be retained in perpetuity which is inconsistent with the JLP and the NPPF. Securing affordable homes for sale in perpetuity can cause issues for potential purchasers when attempting to secure mortgages and will create artificial barriers to home ownership and delivery of affordable housing in Plymouth and South West Devon.	Change to be made	Change to be made to reflect the NPPF.
864196	253	Leonie Stoate	Tetlow King Planning		South West HARP Planning Consortium	DEV10.5 – Space standards and outdoor amenity space	Pleased that the SPD recognises that there may be instances where implementing the Nationally Described Space Standard would be inappropriate and flexibility may be needed.	Noted	Support welcomed.
893484	225	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	Air, water, soil, noise, land and light (DEV2)	The SPD should acknowledge the context of such impacts explained here. For example, planning controls and conditions described in the SPD are not always necessary, particularly in commercial settings.	No change	DEV2 ensures proposed developments will not cause unacceptable on- or off – site risk or harm to human health, the natural environment or living conditions, either individually or cumulatively. This should be considered in any application, regardless of where the site is located. It is for the developer to demonstrate the level of impact caused. Flexibility is already considered within the SPD. For example, in relation to opening hours the SPD states “in areas where there is an intensity or concentration of night-time economy uses more flexibility may be considered and in mixed-use areas a balance will be struck between commercial activity and the protection of local amenity”. The developer could provide a carefully designed noise management plan and a noise impact assessment to demonstrate that no impact will be caused and to justify why opening hours should be extended. If the developer can demonstrate that no impact is caused, this would minimise the conditions applied.
893484	233	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	APPENDIX 3: Shop fronts, including ATMs	Recommends additional working at paragraph 15.37 that acknowledges the value and flexibility that can be achieved through the development of proposed replacement shopfronts of high architectural quality and design.	Change to be made	Agree, change to be made regarding flexibility in achieving shopfronts of high architectural quality and design.
893484	234	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	APPENDIX 4: Primary shopping boundaries and frontages	Primary shopping boundaries exclude Barcode Development and jigsaw site, the bar code should be included in city centre and Primary Shopping boundary given its contribution to the centre	No change	Both the City Centre and Primary Shopping Boundaries are defined on the adopted proposals map which forms part of the JLP and as such cannot be amended through the SPD.
893484	235	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	APPENDIX 5: New work in conservation areas	The representation recommends that the SPD is amended to reflect the exact sentiments expressed in the NPPF in particular paras 189-202.	No change	Whilst officers welcome the feedback contained within the representation it is not the role of the SPD to reiterate verbatim the policies within the NPPF.
893484	231	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	Delivering low carbon development (DEV32)	Inconsistency in approach for fabric based efficiencies in para 9./19 and 9.35 in comparison to para 9.24 and 9.25. Recommends SPD should be amended to clarify and incorporate the energy hierarchy in Policy DEV32 of the JLP, and enable fabric efficiencies – which are inherently sustainable – to be included within this 20 per cent reduction. SPD should recognise technical and viability constraints that may exist for particular developments, and the importance that these are taken into account when	Change to be made	The SPD does recognise the Energy Hierarchy in its approach and this is set out in the guidance for developing an Energy Strategy for a development, and reducing energy demand is always a start. The level of onsite renewable energy required will also reduce if the development is more energy efficient in the first place. It should also be remembered that the policy objectives behind DEV32.5 are not only to reduce carbon emissions but also to increase the deployment

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							considering appropriate carbon reduction measures. SPD should also acknowledge reuse of existing buildings is sustainable and be recognised when considering and assessing carbon reduction and energy efficiency requirements.		of decentralised energy. If however it is difficult to achieve this onsite, then there is flexibility to include some energy efficiency measures towards achieving this. Further clarification has been added to the SPD text to reflect this.
893484	227	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	Derriford Commercial Centre (PLY38) additional guidance	The City Centre should be protected and ensure Derriford Commercial Centre is complimentary to it. Point 3 of 5.43 should reference the 500sqm figure in DEVI6	No change	DEVI6 sets the local threshold for the requirement of an impact assessment and is the adopted policy in the JLP. The SPD adds guidance and the figure of 1,000sqm is higher than this and also the requirement for sequential test for an retail and leisure floor space to identify a scale of floor space which warrant further consideration given it potential to have more significant impact/effect. This does not weaken the JLP policy but gives guidance on the policy consideration.
893484	226	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	DEVI6.2 – Sequential test	Need to protect the City Centre by ensuring main town centre uses are focused within the City Centre to ensure its continued vitality	Noted	Comment welcomed.
893484	229	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	DEVI8.5 - Specific impacts	Flexibility should be given to tenants who wish to include a mix of uses including A5 if it contributes to the vitality of the town centre	No change	This flexibility should be considered on a case by case basis when a change of use application is submitted based on the SPD guidance.
893484	230	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	DEV23.6 – Landscape and Visual Impact Assessment (LVIA)	It is important that thresholds for LVIA requirements is seen as an indicative threshold for the consideration of an LVIA, and that their requirement is proportionate to the proposed development, rather than being applied arbitrarily.	No change	Officers consider that the LVIA requirements are proportionate.
893484	232	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	PLY6.3 – Tall buildings	Suggests including reference to opportunity for tall buildings in excess of 6-8 storeys in City Centre. Suggests clarifying that an EIA may not always be required for tall building planning applications.	Error/clarification to be accommodated	Changes to be made to improve clarity.
893484	228	Mr Mark Underwood	Deloitte LLP		Drake Circus Limited Partnership	Protecting local shops and services (DEV18)	Welcome the recognition of evolution of the town centre in recent years and issues such as changing consumer retail behaviour. Reiterate the importance of flexibility when considering town centre development, including that which is forward looking and enables town centres to diversify and remain relevant to consumer and local needs.	Noted	Support welcomed.
961935	222			Sally Parish	Highways England	DEV29.7 – Travel Plans	Support for the decision on travel plans and sustainable transport opportunities, together with providing a robust framework for the managing and monitoring of such measures.	Noted	Support welcomed.
961935	223			Sally Parish	Highways England	DEV29.9 – Strategic transport infrastructure	The SPD makes clear that development should, where appropriate, contribute to meeting the wider strategic transport infrastructure needs generated by the cumulative impact of development in the area, including both transport infrastructure and sustainable transport measures. Highways England notes that the SPD provides guidance relating to the use of planning obligations to secure the infrastructure required to support development, and we are satisfied that the SPD contains appropriate reference and signposting to highway design, construction management and technical approval guidance to aid developers in their consideration and submission of planning applications.	Noted	Support welcomed.

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961942	196			Ross Simmonds	Historic England	Detailed provisions relating to the Thriving Towns and Villages Policy Area (TTV) - Dartington	The SPD should contain more detail regarding the Dartington policy and Estate Framework.	No change	No further detail needed. The policy and reasoned justification is already very detailed and no further detail is required.
961942	190			Ross Simmonds	Historic England	DEV10.1 – ‘Sense of place’ considerations	Add references to historic environment, including use of evidence such as conservation area appraisals and management plans, upfront to “Sense of place’ considerations”.	Change to be made	Officers believe this addition is useful.
961942	192			Ross Simmonds	Historic England	Development affecting the historic environment (DEV21)	Suggests changes to make language in guidance more consistent with the NPPF.	Change to be made in part	Suggested changes are useful to improve clarity.
961942	193			Ross Simmonds	Historic England	Development affecting the historic environment (DEV21)	Suggest adding link to HE guidance on pre-application assessment, conversion and maintenance of traditional and historic farm buildings and also understand how we have developed new ways of understanding the historic character, survival and use of farmsteads.	Change to be made	Link to be added.
961942	194			Ross Simmonds	Historic England	Landscape character (DEV23)	Registered Park and Gardens are a significant part of the landscape that contribute to the character and distinctiveness and are absent. They should be identified throughout the body of the text from 7.4 through to 7.19, including in the tables and the LVIA assessments. Paragraph 7.62 – we welcome this text. The essence of overlapping policy areas where the historic environment comes in to play is welcome. A similar approach is advocated in other policy areas in the SPD, such as Design, Housing etc.	Change to be made	Landscape character section reviewed and updated accordingly to incorporate Registered Park and Gardens and cross reference other policies.
961942	191			Ross Simmonds	Historic England	Place shaping and the quality of the built environment (DEV20)	Embed more references to historic environment in Place Shaping section.	Change to be made	Additional references to be added.
961942	195			Ross Simmonds	Historic England	PLY6.3 – Tall buildings	Suggests including detail on the expected standard for accurate and realistic visualisations of proposals in context.	No change	Officers consider that the words used give enough clarity that accurate and realistic contextual visualisations will be required and it would be difficult and prescriptive to list detailed technical specifications for the images.
962592	317	Jamie Roberts	Tetlow King Planning		Rentplus UK Ltd	Affordable Housing (DEV7-DEV9) - Affordable Housing tenure mix	Paragraph 4.79 - SPD doesn’t state how 10% of the total number of homes on development sites to be available for affordable home ownership will be achieved. Paragraph 4.80 – don’t agree with the affordable housing tenure split between social rented homes (65 per cent) and Affordable Home Ownership tenures (35 per cent)”. Paragraph 4.81 - explains that ‘in exceptional circumstances’ where viability considerations indicate, then some rented units can be Affordable Rent “to increase overall affordable housing delivery or to meet an identified need”. Can a tenure mix only be altered to meet an identified need, where viability is at issue? If so, this would restrict the Councils’ ability to respond to local needs. Paragraph should be amended.	Change to be made in part	Whilst the suggested form of additional wording is not considered to be essential, we consider that there may be a case for some clarification at para 4.79 to make clear that the first 10% of the affordable housing delivered on site (as a proportion of all units delivered on site) should be secured as affordable home ownership. We do not however think that the requirement for a 65/35% split for social rented housing/affordable home ownership will prevent the delivery of at least 10% affordable home ownership products such as Rentplus, where levels of AH delivery by planning obligations fall below the full 30% policy requirement. The prioritisation of social rented products however reflects the high level of need for

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							<p>Paragraph 4.82 - indicates that the form of affordable home ownership will be considered on a case by case basis, taking into account the requirements of the SHMNA. However, there will be instances where local indicate that a departure is justified and should be included.</p> <p>Paragraph 4.84 bullet point 2 - inconsistent with the NPPF Annex 2.</p> <p>Paragraph 4.84 bullet point 4 – evidence of affordability prior to the submission of a planning application and detailed in the Affordable Housing Statement accompanying the planning application is an onerous task for applicants and would be inappropriate at the outline stage when registered providers are typically not yet involved in scheme formulation. Risks stifling innovation and a wider range of housing types and tenures coming forward. It should be made clear that this detail will either be sought at reserved matters stage or reserved by condition.</p> <p>Paragraph 4.85 discusses the need for accommodation for essential workers. No evidence or methodology is provided to support.</p>		the more affordable forms of rented housing, and we consider that rent to buy models such as Rentplus meet need for affordable home ownership and are therefore best described in this way rather than being considered separately as a type of hybrid affordable housing tenure. The wording for guidance on affordable housing tenure mix is for guidance only and to be used as a starting point for negotiation. However, officers have agreed to amend the wording so this is made clearer.
962592	318	Jamie Roberts	Tetlow King Planning		Rentplus UK Ltd	Affordable Housing (DEV7-DEV9) - Affordable housing, service charges and other estate management charges in the Plan Area	Paragraph 4.92 seeks to cap service charges for affordable housing. Figures quoted for apartment buildings appear very low and should be reviewed as they would have a real impact upon the quality of the service and upkeep of affordable housing buildings.	No change	This guidance was put in place following consultation with Registered Providers including Rentplus. Total housing costs and affordability are key to this consideration, and there is flexibility for higher figures where justified already built in.
962592	316	Jamie Roberts	Tetlow King Planning		Rentplus UK Ltd	Affordable Housing (DEV7-DEV9) - DEV8.2	Welcomes the SPD, but there are detailed aspects which should be reviewed and amended to ensure that the SPD is workable and can facilitate the delivery of rent-to-buy as an important part of the overall tenure mix. Councils must optimise the delivery of affordable housing in all its tenures and Rentplus works closely with authorities, stakeholders and developers to help achieve this wider aim.	Noted	There is adequate flexibility to allow us to respond to accepting RP. Comments noted.
962592	319	Jamie Roberts	Tetlow King Planning		Rentplus UK Ltd	DEV8.1 – Overall housing mix	Recommend paragraph 4.18 is deleted which seeks to achieve variety in the mix of sizes of dwellings. The mix requirement is convoluted and could result in contrived design solutions to achieve this. Mix should respond to specific local circumstances. DEV8 sets the NDSS.	Change to be made	Paragraph removed.
962592	320	Jamie Roberts	Tetlow King Planning		Rentplus UK Ltd	DEV8.1(i) – Redressing imbalance	Paragraph should be amended to explain that outline permissions will be subject to conditions to require the submission of details of housing mix concurrent with each relevant reserved matters application. This will enable the Councils to retain control over the housing mix but also provide flexibility to applicants and Registered Providers to respond to specific housing needs. Fixing a housing mix at the outline stage makes it difficult to respond to changing market circumstances.	Change to be made	The LPA requires an applicant to agree mix at reserved matters and does not seek to fix a mix at outline stage. Agree to reword paragraph 4.25.
962837	427			Mrs Corine Dyke	Natural England	APPENDIX 6: Additional guidance for DEV26	Paragraph 18.3 - advise that the recognised wording as set out in the Habitats Regulations is used which requires proposed development (alone or in-combination with other development) will not have a likely significant effect on the	Change to be made in part	Changes to be made as recommended, however the change at 18.5 is deemed unnecessary.

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							<p>integrity of European Sites.</p> <p>Paragraph 18.4 - include here that mitigation measures cannot be taken into account at this stage.</p> <p>Paragraph 18.5 - The agreed strategic approach to HRA regarding the South Hams SAC could be mentioned here as well, as discussed in greater detail further on in the appendix too.</p> <p>Paragraph 18.13 - In the second sentence, 'new residents' should be replaced with 'new residential and tourist development'.</p> <p>Paragraph 18.14 - Recommend replacing 'including which mitigation sums from development are required to contribute towards mitigation' with the following: 'how new development can contribute to the strategic mitigation solution, rather than undergoing separate HRA and delivering bespoke mitigation' or similar. Will there be a link to the agreed mitigation plan in this section of the SPD?</p> <p>Paragraph 18.23 Does the plan area benefit from a Coastal Concordat? If so then this could be explained here as it will simplify matters for developers. If not, then maybe you would like to consider adopting a Coastal Concordat.</p>		
962837	416			Mrs Corine Dyke	Natural England	DEV2.1 and DEV2.2 – Air	Air pollution is not only created by traffic but also agricultural developments such as slurry stores and anaerobic digesters. Reference to the DEFRA tool for calculating air quality impacts from such developments should be added.	Change to be made	Reference to agricultural development and its impact on air quality to be added to the SPD highlighting possible need for a Simple Calculation of Atmospheric Impact Limits (SCAIL) assessment as part of an Air Quality Assessment.
962837	418			Mrs Corine Dyke	Natural England	DEV23.6 – Landscape and Visual Impact Assessment (LVIA)	Para 7.14 recommends explanation that a key purpose of the assessment is firstly to show what possible landscape impacts would result from the proposal and then how the development would avoid or mitigate these impacts. Recommends landscape assessment table being expanded to include scenarios of lower or unknown height and smaller scale developments. This paragraph should also refer to the assessment of cumulative impacts.	Change to be made	Agree to amend the table to include the requirement for an LVIA which will be judged on a case-by-case basis.
962837	419			Mrs Corine Dyke	Natural England	DEV23.7 – Avoidance, mitigation, compensation and enhancements	Para 7.18 Advises that minimising impacts is not a separate item in the hierarchy but is a way of mitigating impacts - and thus on a par with other ways of mitigating impacts. Advises including the points made under minimise under the mitigate heading.	Change to be made in part	Change to be made to split 'avoid into two sections (i. avoiding altogether and ii/ minimise).
962837	420			Mrs Corine Dyke	Natural England	DEV24.1 and DEV24.2 – Coastal location	Paragraph 7.27 – 7.32 - welcomes the clarity provided regarding development in coastal locations in respect of landscape impact but want further clarity on the acceptability of coastal development with regard to coastal change.	No change	The paragraphs identified relate to the landscape character policy, however, DEV36 provides the additional detail requested by NE.
962837	422			Mrs Corine Dyke	Natural England	DEV25.3 – Major developments in the AONBs	Recommend that it is clarified what is meant by harm and significance.	No change	The amendment proposed in response to comment 82 partly addresses comment 422. It is not possible or appropriate to provide more detailed advice in the SPD. This can be found in the AONB Management Plan and would be a judgement made by a landscape professional.

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962837	425			Mrs Corine Dyke	Natural England	DEV26.2 - Nationally significant sites for nature conservation	Paragraph 7.80 - The zones around SSSIs and NNRs are Impact Risk Zones (IRZ). It may be useful to add in footnote 132 that the website is called 'Magic'. It would also be useful to include some text about ancient or veteran trees.	Change to be made	Officers agree the changes will be useful. Changes to be added.
962837	426			Mrs Corine Dyke	Natural England	DEV26.5 – Biodiversity Net Gain	<p>Para 7.87 recommends also quoting the Government's 25 Year Environment Plan in this context.</p> <p>Para 7.86 - welcomes this section and specifying a minimum percentage for biodiversity net gain and metric to use.</p> <p>Para 7.88 - Welcomes text about forthcoming Environment Bill. However recommends adding that if and when the bill is on the statute books, the LPA will not only encourage but also ensure that appropriate net gain is delivered. Suggests referencing the forthcoming simplified metric calculator tool, which could be used once published. Could mention the ECOP approach will be used until a simplified metric calculator is available.</p> <p>Para 7.89 - Advises revising this paragraph. It should be made clearer that biodiversity net gain is in addition to not just compensation but also to mitigation.</p> <p>Para 7.90-7.100 - recommends articulating whether priority is to be given to net gain delivery on-site or to use net gain to deliver area-wide biodiversity aspirations. The Defra metric is weighted to favour on-site delivery. Could provide guidance on how the LPA intends development to contribute to net gain where it is not possible to deliver on-site or the developer does not have access to land off-site where this can be achieved, such as through the purchase of biodiversity "units" from the LPA or from a third party. Defra net gain metric has a column which considers "strategic significance" of each habitat and weights losses and creation/enhancement higher if they are "Within area formally identified in local strategy".</p> <p>It would be useful to clearly list within the SPD which "Local Strategies" (and which areas or habitats within these, if appropriate) this high value would apply to. Additionally we suggest that you may wish to specify when a management plan and/or monitoring will be required to secure the proposed habitats to the necessary condition by a target time. Paragraph 7.105 We recommend that you add something about the time it would take to develop the biodiversity value.</p>	Change to be made	Various changes in response to comments on BNG agreed. However, with reference to paragraphs 7.90-7.100 - officers consider that the approach to offsite compensation is already set out in table 19, and set out in Appendix 6 18.50 point.5.
962837	415			Mrs Corine Dyke	Natural England	Introduction	Recommend that reference is made to update the SPD where significant changes occur to reflect best practice, strategic solutions or monitoring outcomes.	No change	The ability to update the SPD is mentioned in the introduction.
962837	417			Mrs Corine Dyke	Natural England	Landscape character (DEV23)	Paragraph 7.8 The diagrams are not clearly written and require some revision to enhance their clarity. The circle format with different backgrounds is also not easy to read.	Change to be made	Graphics to be reviewed to improve legibility.
962837	421			Mrs Corine Dyke	Natural England	Nationally protected landscapes (DEV25)	Advise to strengthen the reference to Dartmoor National Park.	Change to be made	Reference to Dartmoor National Park to be added.
962837	423			Mrs Corine Dyke	Natural England	Protecting and enhancing biodiversity and	Requests for clarity to various sections of DEV26.	Change to be made	Changes to be made to improve clarity.

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						geological conservation (DEV26)			
962837	424			Mrs Corine Dyke	Natural England	Protecting and enhancing biodiversity and geological conservation (DEV26)	Concerned the text on the page 123 diagram is unclear/confusing, also uses unexplained acronyms. Queries representation of mitigation and compensation within the diagram.	Change to be made	Diagram to be updated to improve clarity
1002062	239			Heather Elgar	Woodland Trust	Community food growing and allotments (DEV5)	Welcomes the recognition of trees in para 3.97.	Noted	Support welcomed.
1002062	238			Heather Elgar	Woodland Trust	DEV2.1 and DEV2.2 – Air	Welcome the inclusion of trees and landscaping features as potential measures to improve air quality under 3.25 but suggest amending slightly which would nullify the need for where appropriate.	Change to be made	Agree the change to include reference to the right tree/landscaping feature in the right place.
1002062	240			Heather Elgar	Woodland Trust	DEV20.5 – Landscape design	Suggests alternative wording of para 6.26: 'Special care will need to be given to the location and species mix of trees to ensure every planted tree has the best potential to reach maturity and contributes to healthy ecological networks' to better reflect the principle of 'the right tree in the right place' and to ensure that the contribution of individual trees to the wider (urban) forest is considered.	Change to be made	Agree to change wording to better reflect the principle of 'right tree in the right place'.
1002062	242			Heather Elgar	Woodland Trust	DEV26.5 – Biodiversity Net Gain	Welcomes paragraph 7.105 re: Biodiversity Net Gain principles, suggests inclusion of reference to 'ecosystems approach' to reinforce multiple benefits.	Change to be made	Suggestion is useful and to be included
1002062	244			Heather Elgar	Woodland Trust	DEV32.6 – District energy networks	Supports opportunities for district heating. Acknowledges challenges to retrofitting new urban trees due to underground services and encourages working with utilities for opportunities for new trees during maintenance and upgrades. Ground sources heat pumps might provide opportunities for above-ground green corridors.	Noted	Noted. No changes proposed.
1002062	241			Heather Elgar	Woodland Trust	Protecting and enhancing biodiversity and geological conservation (DEV26)	Suggests inclusion of reference to ancient and veteran trees in paragraph 7.66.	No change	Paragraph 7.66 relates to the hierarchy of protected sites - ancient and veteran trees are covered in policy DEV28 and the related DEV28 section of the SPD.
1002062	237			Heather Elgar	Woodland Trust	Sustainable Development and the Climate Emergency	Welcomes the principles at 2.4 which reflect the importance of a sustainable spatial strategy in response to the Climate Emergency but reference should be made of the role of green infrastructure in adaptation and resilience. Recommend amending 2.12 to read: '...an explicitly recognised link between the sustainable characteristics of development and climate change mitigation and adaptation, ...' to better reflect the need for decarbonisation, carbon drawdown and building resilience and adaptation to climate change, rather than solely carbon reduction.	Change to be made	Change to be made to improve clarity.
1002062	243			Heather Elgar	Woodland Trust	Trees, woodlands and hedgerows (DEV28)	Generally supportive of the document has asked that the word 'biodiversity' be included, a reference added to ancient woodland/tree section and assurance on use of	Change to be made in part	7.147 it is agreed that the word 'biodiversity' should be added to the 3rd bullet point after providing shade'. 7.150 the suggestion to allow for an increased root

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							native species and trees sourced where possible from UK and Ireland with sound biosecurity measures.		protection area for ancient and veteran trees is noted. 7.165 it is agreed that it would be useful to add a reference to 'Planners' Manual for Ancient Woodland and Veteran Trees (Second Edition)' in the table under Impacts of nearby development section. 7.176 the adopted Plan for Trees and the associated Delivery Programme states new planting will be responsibly sourced and good practice followed in relation to biosecurity and aims to use native trees where possible/practical.
1002187	8	Lucy Bartley	Wood		National Grid	General	No specific comment.	Noted	Noted.
1002187	34	Matt Verlander	Avison Young		National Grid	General	No specific comment.	Noted	Noted.
1002212	176			Mike Deaton	Devon County Council	Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy (DELI)	Clarity needed to para 12.12 of how S106 will be split to 'other' strategic infrastructure needs	No change	It is not possible to set out the apportioning of S106 contributions towards different infrastructure needs for individual planning applications as part of the SPD. The assessment will be on a case by case basis and must take account of needs and capacity, development impacts and mitigation required.
1002212	163			Mike Deaton	Devon County Council	DEV2 - Night-time economy (agent of change)	Suggestion to include mining and waste management operations to 'agent of change' definition. Para 3.48 misquotes NPPF 182 by referring to industrial/commercial should be businesses and community facilities.	Change to be made	The NPPF paragraph 182 does not explicitly say what new development is. The SPD has focussed the 'agent of change' principle towards the live music venue scene, however officers agree that the 'conflict' could occur between other uses and so text to be amended to widen the references of use. Reference to the NPPF corrected.
1002212	162			Mike Deaton	Devon County Council	DEV2.1 and DEV2.2 – Air	Suggest adding extra bullet point to paragraph 3.25 as a catch-all for any other improvements. Suggested text 'any other improvements that would address the specific local air quality issues'. DCC have existing schemes to improve air quality issues in South Hams and West Devon. Paragraph 3.26 needs further clarification as to how damage caused by emissions is calculated, mitigated and implemented. Clarification needed on what is major development and if it applies to minerals, waste and highways development.	Change to be made	Agree to add bullet point as a 'catch all'. With regards to County Matters applications, officers do not believe the SPD could be used for these types of applications, however air quality impacts of waste and mineral operations still have to be considered and DCC/Dartmoor National Park policies should cover these elements. The impacts from waste and mineral applications on air quality will not only be the impacts by way of road travel but also the dust and other fugitive emissions. Reference added to national guidance on the calculation of costs.
1002212	166			Mike Deaton	Devon County Council	DEV21.2 – Designated heritage assets	Suggested text change to para 6.52 to say 'preserve' not 'reserve'.	Error/clarification to be accommodated	Spelling to be corrected.
1002212	167			Mike Deaton	Devon County Council	DEV21.2 – Designated heritage assets	Following initial consultation with the relevant officers, various levels of archaeological assessment and evaluation may be required to inform a development proposal prior to the submission of a planning application. Suggest adding additional text to end of para 6.70 'to inform a development proposal prior to the submission of a planning application.'	Change to be made	Change to be made as it would be beneficial to ensure historic environment officers are engaged early in those development proposals (including pre-app proposals) where existing archaeology may be known or where archaeological potential may exist and would alert developers to be cognisant of archaeological planning requirements.

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1002212	168			Mike Deaton	Devon County Council	DEV21.3 – Non-designated heritage assets (NDHAs)	Suggest include archaeological coverage to flow chart on page 101 to improve consistency.	No change	Officers consider this is already adequately covered in previous paragraphs and that adding it to the flow chart will add confusion to the flow chart. The flow chart points applicants to the HER and other sources to establish the potential for archaeological remains that should be treated as non-designated heritage assets.
1002212	170			Mike Deaton	Devon County Council	DEV31.3 – Site Waste Management Plan (SWMP)	Add text that refers to policy W4 of the Devon Waste Plan requiring waste audits for all major development in West Devon and South Hams.	Change to be made	Reference to W4 of the Devon Waste Plan is already within the document, however further references have been added.
1002212	172			Mike Deaton	Devon County Council	DEV32.1 – Minimising natural resources in development	DEV32 refers to minimising use of natural resources but needs to be referenced in the guidance of the policy at 9.6.	No change	Additional reference to minimising use of natural resources here is unnecessary.
1002212	174			Mike Deaton	Devon County Council	DEV35.2 and DEV35.7 – Flood Risk Assessment/Drainage Strategy requirements	Suggests paragraph 9.79 should mention the DCC groundwater monitoring policy in the infiltration section. Information on this is available on the DCC website (https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/)	Noted	Reference to DCC suds policy including groundwater monitoring is already included within the document.
1002212	175			Mike Deaton	Devon County Council	DEV35.4 – Surface water drainage hierarchy	Recommends change to wording in paragraph 9.90 as DCC would not allow unlimited discharge to watercourses and current text implies it would allow.	Change to be made	DCC to be consulted regarding discharge rates to watercourses outside of PCC where an unlimited surface water discharge may not be acceptable.
1002212	165			Mike Deaton	Devon County Council	Development affecting the historic environment (DEV21)	Suggested text change to paragraph 6.42 from 'considered' to 'consulted' with a caveat to say online data is not up to date. Consult County Council Historic Environment team for developments with an impact on heritage or setting.	Change to be made	Agree to make the change.
1002212	160			Mike Deaton	Devon County Council	Introduction	It should be made clear that Devon County Council is the planning authority outside Plymouth for Waste and Minerals. DCC's adopted Minerals and Waste Plans will take primacy in relation to associated mineral and waste development outside Plymouth, although the JLP and SPD will be material planning considerations. DCC has their own validation list and pre-app service.	Change to be made	Additional references to the role of DCC to be added.
1002212	169			Mike Deaton	Devon County Council	Landscape character (DEV23)	Paragraph 7.5 link 109 needs updating to show document dated June 2018 not Feb 2017.	Change to be made	Link to be updated.
1002212	164			Mike Deaton	Devon County Council	Maintaining a flexible mix of employment sites (DEV14)	Policy M2 protects sites for mineral extraction in Devon Minerals Plan and should be set out within the document. Make explicit that sites outside Plymouth should demonstrate alternative requirements in the Minerals Plan. Refer to policy W10 of Devon Waste plan in the SPD. SPD should also state that para 5.5. does not apply outside of Plymouth.	Error/clarification to be accommodated	Changes to be made to improve clarity.
1002212	173			Mike Deaton	Devon County Council	Managing flood risk and water quality impacts (DEV35)	Suggests adding the following wording to para 9.73 to provide clarity: DCC maintains, applies and monitors a strategy for local flood risk management in Devon. The high level strategic document outlines the responsibilities of the Risk Management Authorities in Devon and how they are working in partnership to coordinate local flood risk management. Accompanied by a suite of supporting	Change to be made	Changes to be made to improve clarity.

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							documents and guidance, this covers SuDS and Land Management Guidance, engaging with communities and preparing for floods, responding to flood events, collaborating on flood risk studies; and investing in flood management improvements'.		
1002212	161			Mike Deaton	Devon County Council	Sustainable Development and the Climate Emergency	Delete 'local' from second line para 2.13.	Error/clarification to be accommodated	Agree to amend and delete the word 'local' in para 2.13.
1002212	171			Mike Deaton	Devon County Council	Waste management (DEV31)	Supports signposting to policy W4 in para 8.99.	Noted	Support welcomed.
1002354	11			Howard Asbridge		Prioritising growth through a hierarchy of settlements (TTV1)	Proposes an alternative application of local connection restrictions as applied through the settlement hierarchy, which is more restrictive than currently outlined.	Change to be made	The SPD does not seek to rewrite the local connection requirements used by Registered Providers or through the Devon Home Choice allocations policy. The local connection requirements contained within the SPD refers to open market housing, and not affordable housing - reference is made to Housing Needs Surveys, which only identified affordable housing need, and not the more general open market need. How and where local connection requirements are applied throughout the settlement hierarchy will be reviewed in connection with TTV1 and TTV25, so the issues raised will in this comment will be considered as part of that process.
1002444	224			Gill Claydon	Stokenham Parish Council	General	Concern that the wildlife and ecological aspects were not addressed and the policy interpretation firm enough.	No change	Officers believe that the wildlife and ecological aspects is adequately addressed within the Natural Environment chapter.
1002497	279			Dan Janota	Dartmoor National Park Authority	Protecting and enhancing biodiversity and geological conservation (DEV26)	Comments relate to Tamar EMS Zone of Influence extending into Dartmoor NPA, and how this effects their Local Plan, etc	No change	Officers, with advice from Natural England, consider that the approach to identifying the Plymouth Sound and Estuaries Zone of Influence is robust and appropriate. It will be for Dartmoor National Park, with advice from Natural England, to identify how to address increased recreational impacts arising from Dartmoor's Local Plan.
1002518	2			Martyn Dunn	South West Water	General	No specific comment.	Noted	Noted.
1002559	54			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9)	Links to the affordable housing section need better clarity.	Change to be made	Agree to amend, additional reference to the paragraph numbers will improve legibility and clarify the meaning.
1002559	55			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9) - Affordability of housing in the TTV Area	Paragraph 4.68 seems to overstate the problem. Band D is 'Low Housing Need'. We suggest that, to enable proper comparison with the PPA the TTV Area uses Band A-C.	Not applicable	This comment relates to Devon Home Choice rather than planning considerations and so cannot be addressed by the SPD.
1002559	56			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9) - Affordable housing thresholds in the Plan Area	There is much evidence to show that 'Extra Care' is capable of being a C2 use class or a mix of C2 and C3.	Change to be made	When determining whether proposals fall into the C2 (Residential institutions) or C3 (dwelling houses) classes, consideration will be given to "the level of care and scale of communal facilities provided". Amendment to SPD to be made to clarify this position.
1002559	59			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9) - Affordable housing,	Inappropriate for a SPD to set charge caps.	No change	Charge caps are included as a guide only.

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						service charges and other estate management charges in the Plan Area			
1002559	57			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9) - DEV7.2	DEV7.2 says nothing about 20 per cent being acceptable in a Build to Rent scheme. The SPD cannot make new policy.	Change to be made	Wording amended.
1002559	58			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9) - DEV8.2	4.78 - there is no reference in DEV8.2 to gross internal area of over 1,000 sq.m. The SPD cannot make new policy. Also, the way the paragraph is written, implies that schemes of 6-10 homes under 1,000 sq.m. GIA will not be required to make Affordable Housing contributions. Is that the intention?	Change to be made	Sentence to be included that developments of 6-10 units will require off-site financial contribution as per paragraph 4.110. Reference to 1,000sqm threshold removed for clarity and to avoid confusion.
1002559	60			Janet Smallcombe	Tavistock Town Council	Affordable Housing (DEV7-DEV9) - Off-site provision and commuted sums in the Plan Area	4.111 - the fourth bullet point appears to be an entirely new policy, unrelated to anything in the JLP and the 'squared' should be 'square'.	Change to be made	Error to be corrected with regard to 'squared' and 'square'. Reference to 1,000sqm threshold removed for clarity and to avoid confusion.
1002559	110			Janet Smallcombe	Tavistock Town Council	APPENDIX 2: Specific materials for the Plan Area	Suggests SPD is contradictory on which colours should be used for new development.	Change to be made in part	Reference to colour to be removed at 14.7. Whilst interesting history, on reflection officers believe it may be unhelpful to include reference to colour in this context.
1002559	111			Janet Smallcombe	Tavistock Town Council	APPENDIX 4: Primary shopping boundaries and frontages	The Primary Shopping Frontage shown in the SPD Appendix 4 varies significantly from that described in the evidence base (the Retail Study, PBA).	Error/clarification to be accommodated	This is an error to be amended to reflect the Joint local Plan evidence base before the final SPD is adopted. Clarification will also be added to ensure it's clear that the Primary Shopping Area and Centre Boundaries are the same thing.
1002559	112			Janet Smallcombe	Tavistock Town Council	APPENDIX 6: Additional guidance for DEV26	18.15 - Not normally possible for a condition to require payment of a sum of money. This should be achieved by a S106 Obligation, as noted in Type 4 in the Table at paragraph 12.36. 18.24 - Although this is not in Tavistock, we note that six roosts are identified on the plan.	Change to be made in part	Comment refers to the mechanism of taking a sum from development to mitigate in-combination recreational impacts on the Plymouth Sound and Estuaries EMS. Taking the sum by condition is referenced in paragraph 18.15 in the SHDC and WDBC area. This method of taking the sum has been informed by legal advice, however SHDC and WDBC are soon to commence securing and taking this sum by Unilateral Undertaking/s106.
1002559	102			Janet Smallcombe	Tavistock Town Council	Community energy (DEV34)	Supports policy DEV34 especially community energy projects.	Noted	Support welcomed.
1002559	52			Janet Smallcombe	Tavistock Town Council	Community food growing and allotments (DEV5)	Are there any cities outside Plymouth in the plan area?	Not applicable	No cities outside of Plymouth.
1002559	77			Janet Smallcombe	Tavistock Town Council	Cornwall and West Devon Mining Landscape World Heritage Site (DEV22)	The Cornwall and West Devon Mining Landscape World Heritage Site SPD needs review and update due to out-of-date links in the document.	Not applicable	This comment refers to the need to update the WHS SPD and is outside the remit of the SPD.
1002559	109			Janet Smallcombe	Tavistock Town Council	DEL1.3 – Planning obligations	Tavistock Town Council is concerned about the inadequacy of the S106 process to deliver infrastructure in the Town and asks that local planning authorities institute an annual publication of S106 Implementation programmes, setting out	No change	The S106 process is subject to Government legislation and guidance. The councils are required to prepare Infrastructure Funding Statement from December 2020. Infrastructure funding statements are required to set

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							clearly what infrastructure is to be delivered to mitigate the impact of developments.		out the infrastructure projects or types of infrastructure that the authority intends to fund, either wholly or partly, by the levy or planning obligations, though this will not dictate how funds must be spent and in turn collected.
1002559	61			Janet Smallcombe	Tavistock Town Council	Delivering high quality housing (DEV10)	Supports the Building for Life principle and guidance but the SPD and JLP doesn't seem to follow this. Would value a clear statement of the authorities' own design requirements in the form of a Design Guide incorporated into this SPD, rather than referring to third party documents. Paragraphs 4.119 and 4.120 use terms such as 'have regard to' and 'consider'. Will applications that do not comply with the guidance in these third party documents be refused permission? If not, then 'having regard to' and 'consider' are insufficient to achieve this. The necessary requirements should be built into a design framework in the SDP itself and applicants should be 'required' to incorporate them.	No change	The words used are consistent with policy DEV20 which says that larger scale development should seek to address Building for Life criteria or a similar design framework. The words are considered proportionate as they are related to the scale of development and also give flexibility for the use of the other recognised design assessment frameworks such as that in the government's National Design Guide. It is considered that there is sufficient design guidance within the SPD and its appendices, considering the scope and role of the document and balanced with the need to keep the document focused and as streamlined as possible, and to avoid undue repetition or duplication, for example by including guidance readily available elsewhere within the body of the document.
1002559	97			Janet Smallcombe	Tavistock Town Council	Delivering low carbon development (DEV32)	9.4 Not clear and helpful for the reader to use third party documents to interpret meaning of policy. Strongly recommends either extracting all third party documents that supplement policy or the documents should be referred to as 'suggested reading'. 'read in conjunction with ...', gives the documents a status that they cannot possibly have. Same point as above in relation to third party documents.	Change to be made	Officers have relocated some of the suggested reading to the relevant part of the policy, rather than introduce this at the beginning, to make the introduction simpler and easier to navigate.
1002559	98			Janet Smallcombe	Tavistock Town Council	Delivering low carbon development (DEV32)	Support diagram 9.5 however SPD needs to define 'major' and 'minor'.	Change to be made	Further clarification has been added around expectations, including clarification that Householder applications will not be subject to the same requirements.
1002559	62			Janet Smallcombe	Tavistock Town Council	DEV10.4 – Residential annexes	4.126 In the second line, 'principle' should be 'principal'	Error/clarification to be accommodated	Spelling to be corrected.
1002559	63			Janet Smallcombe	Tavistock Town Council	DEV10.5 – Space standards and outdoor amenity space	4.137 It is common practice to specify a minimum garden length (10 metres) as well as an area.	No change	Paragraph 4.139 allows for flexibility to be used when considering minimum standards and to consider site specific circumstances.
1002559	64			Janet Smallcombe	Tavistock Town Council	DEV10.6 – Development of garden space	The definition of Previously Developed Land only includes gardens outside built up areas.	Error/clarification to be accommodated	Wording added for clarification.
1002559	65			Janet Smallcombe	Tavistock Town Council	DEV10.8 – Standard of accommodation (HMOs)	Suggested minor changes to the text in paragraph 4.166 to clarify the wording and the identification of a typo in paragraph 4.167.	Error/clarification to be accommodated	These comments are helpful. A minor change will be made to paragraph 4.166 to address concerns regarding the ambiguity of the word 'might'. The spelling mistake in paragraph 4.167 will be corrected as suggested.
1002559	66			Janet Smallcombe	Tavistock Town Council	DEV14.1 – Change of use of existing employment sites	Marketing Campaigns for employment sites should not be 'clouded' by marketing for other uses such as retailing.	Not applicable	The JLP LPAS are not able to control how buildings are marketed although proposed changes of use would need to demonstrate that the building was marketed for employment uses and that any other proposed uses

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									were subject to appropriate planning permissions. However, if the marketing campaign that is presented to the LPA as evidence does not provide a fair opportunity for employment occupiers to take the premises, the LPA may take this into account when deciding if the change of use should be allowed.
1002559	68			Janet Smallcombe	Tavistock Town Council	DEV15.5 – Garden centres and farm shops	5.18 is wrong and should be removed and is contrary to policy as the JLP specifies that the area of supply should be the 'host' parish and adjoining parishes.	Change to be made	DEV15.5 states that 75 per cent of produce should be from the immediate and adjoining parishes and whilst the world should will allow some flexibility when making judgements, text to be updated.
1002559	69			Janet Smallcombe	Tavistock Town Council	DEV16.3 – Impact assessments	Term gross is synonymous with industry term net retail. Absence of definition in JLP the SPD should have a glossary defining gross, gross retail and net retail.	Change to be made in part	The terms gross and net have defined meanings and as such specific definition in the SPD is not required, however, a slight change will be made to the SPD to state that the NPPG defines gross floorspace. The SPD does not have a glossary.
1002559	71			Janet Smallcombe	Tavistock Town Council	DEV18.1 – Retail hierarchy	Paragraph 5.55 - if numbers, length and size proportions etc. are important aspects of the LPA's decision making, then it is important to provide full guidance on what is meant by each of these measures	No change	Terms used in paragraph 5.55 are considered suitably clear and further guidance is not considered necessary.
1002559	72			Janet Smallcombe	Tavistock Town Council	DEV18.5 - Specific impacts	Clarify wording in para 5.56 to refer to A5 uses	Change to be made	Agree, reference to A5 take-away uses to be added.
1002559	46			Janet Smallcombe	Tavistock Town Council	DEV2 - Night-time economy	Comments related to outside areas, smoking shelters and street cafes do not appear to relate to Policy DEV2 so should the comments be relocated elsewhere.	Change to be made in part	The guidance on the night-time economy and street cafes is useful. For clarity however, additional links have been added cross-referencing to this section.
1002559	47			Janet Smallcombe	Tavistock Town Council	DEV2 - Street cafes	Guidance related to street cafes doesn't appear to relate to DEV2 and would be almost impossible to achieve in Tavistock.	Change to be made in part	The initial section of paragraph 3.64 makes it clear that the bullet points are considerations, it does not say that permission will be refused if they fail to meet every point. Paragraph 3.65 is clear that this relates to outdoor cafes. The guidance on the night-time economy and street cafes is useful. For clarity however, additional links have been added cross-referencing to this section.
1002559	43			Janet Smallcombe	Tavistock Town Council	DEV2.1 and DEV2.2 – Air	3.21 - 'Minimise' and 'having no significant impact on' are not the same thing. One can demonstrate that you have minimised impact but it could still be significant. It is vital to maintain consistency between the JLP and the SPD. 3.25 - Do the local planning authorities really mean "all developments"? Does this include applications for extensions, new sheds etc, single house plots/replacement dwellings? It is unreasonable to expect all of these to prepare Travel Plans, Green travel vouchers etc. 3.26 - The glossary for the JLP says that Major Development is to be defined in the SPD. It is not, which is a major omission with potentially-serious consequences. For the avoidance of doubt and consistency with other policies, the definition of 'major' should cover developments for town centre uses of 250 sq.m. or more	Change to be made in part	3.21 - The respondent is correct that a development's impacts could be minimised but still significant and still justify refusal on air quality grounds. Change to be made to improve clarity. 3.25 - Where after mitigation proposed a development is still assessed as having a significant impact on air quality in accordance with relevant technical guidance, this would still be against our core policy and as such the development would not be supported. However developments may individually be acceptable but cumulatively create a significant impact, as such there is a need that all developments which create additional traffic should consider their impacts and how to minimise/mitigate these. 3.26 - the JLP states only that in some cases, for a particular policy, major development may be specifically defined in an SPD, not that it will.

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1002559	44			Janet Smallcombe	Tavistock Town Council	DEV2.1 and DEV2.3 – Water	3.29 - this seems to be a new policy rather than interpretation. Interruption of water supplies may be a material consideration but is not to be covered by DEV2.3.	No change	DEV2.1 and DEV2.3 both cover this topic and so is appropriate to include guidance.
1002559	45			Janet Smallcombe	Tavistock Town Council	DEV2.1 and DEV2.5 – Land	Seeks clarity over 'where appropriate' means when applying DEV2.5.	No change	Paragraph 3.35 provides clarity on 'where appropriate' for DEV2.5 - where a contamination assessment has been undertaken, or where there is a risk of contamination and a Phase I study has been required.
1002559	76			Janet Smallcombe	Tavistock Town Council	DEV21.2 – Designated heritage assets	The representation correctly identifies an absence of CAA's and CAMP's across West Devon. It also queries delays in public consultation on the CAA update and new CAMP for Tavistock.	Not applicable	The production of CAAs and CAMPs is outside the remit of the SPD.
1002559	79			Janet Smallcombe	Tavistock Town Council	DEV23.3 – High quality design	7.11 - Support for the Landscape Character Assessment for West Devon being included but this is draft and over 3 years old? Could the Plymouth User Guide be incorporated into the West Devon Document to make it more user friendly? 7.12 - does not reference World Heritage Sites only conservation areas. Needs to recognise importance.	Change to be made	Plymouth LCA user guide to be referenced and World Heritage Sites to diagram.
1002559	80			Janet Smallcombe	Tavistock Town Council	DEV23.6 – Landscape and Visual Impact Assessment (LVIA)	Table 17 - how does the local planning authority intend to determine when a site is 'within' a Main Town, such as Tavistock without settlement boundaries?	No change	Apply paragraph 5.5 of the JLP, which requires a character assessment of whether a site is considered to be 'within the built up area'.
1002559	82			Janet Smallcombe	Tavistock Town Council	DEV25.3 – Major developments in the AONBs	The JLP states that 'major development' will be defined in the SPD. It is not. This needs to be rectified.	Change to be made in part	The JLP does not state that it will define major development. However amendment to be made to improve clarity.
1002559	84			Janet Smallcombe	Tavistock Town Council	DEV26.4 - Protected species, Priority Habitats and Species and associated planning policy and legislation	Support for reference to hedgerows as Priority Habitats in paragraph 7.84.	Noted	Support welcomed.
1002559	85			Janet Smallcombe	Tavistock Town Council	DEV26.5 – Biodiversity Net Gain	Welcomes requirement of the measures for biodiversity for minor developments. Encourages additional measures but need a way of achieving this. DEV26.5 relates to major development but its application cannot be extended to minor developments by SPD, would need a DPD.	No change	DEV26.5 does reference 'enhancements for wildlife' within the built environment at all scales of development, and the language in paragraphs 7.88 and 7.96 to 7.102 is couched in terms of 'encouragement' as opposed to 'must.' It should also be noted that the NPPF does not distinguish between scale of development when referencing 'measurable net gain' in paras 170, 174 and 175 - the language of the SPD is consistent with the NPPF.
1002559	88			Janet Smallcombe	Tavistock Town Council	DEV29.3 – Parking provision: residential	8.7 - not enough parking provision provided. Any new developments regardless of bedroom number should have a minimum of 2 parking spaces allocated. 8.8 - In practice, does this mean that these levels of parking will be treated as minima? 8.9 - garages should not be counted as a parking space and whether garages are counted as parking should be secured in perpetuity either by condition or agreement removing the ability to change its use. If there is no such condition or agreement in place, then garage provision will not count toward parking requirements. The universal provision of Electric Vehicle Charging Point in garages is not a	No change	It should be noted that these are indicative car parking standards and the policy clearly states that higher or lower levels of car parking may be acceptable supported by evidence. It is acknowledged that higher levels of car parking may be required for residential development taking place within the SH and WD areas and this is specifically referred to. It cannot be assumed that all garages are not used for car parking and therefore it is right that this be considered on a case-by-case basis. Officers asking for EV Charging Points is not new policy and the Highway Authority maintain the view that the need for such should be included

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							<p>requirement of the JLP and is new policy.</p> <p>8.10 - This approach works well for visitor parking but it is much more difficult for parking 'allocated' to particular homes, which should be provided either in curtilage or in allocated communal areas.</p> <p>8.13 - The fourth bullet point should read "Whether there are good pedestrian and cycle links;"</p>		<p>within the SPD. Conditions relating to the use of garages will be considered at the planning application stage (if necessary) or this could be controlled by developers potentially removing PD rights or applying restrictive covenants.</p> <p>In relation to new developments incorporating on street parking this has been successfully achieved for both visitors and residents but officers acknowledge that a range of parking options are often most successful. Para 8.13 refers to accessibility however bullet point 4 could be amended if desired.</p>
1002559	89			Janet Smallcombe	Tavistock Town Council	DEV29.4 – Parking provision: non-residential	<p>8.16 - important to define what the terms 'gross floorspace' means in the context of the JLP. In addition, concerned about whether these requirements will be imposed on applications for new Town Centre uses (including A1-5, B1 Office, Hotels etc) within defined centres, or will those centres continue to rely on shared 'Town Centre' parking provision? Why is there no requirement for B8 greater than 2,500 m2 ? The requirement for C2 uses should also include Extra Care provision.</p> <p>8.21 - the SPD should indicate where and how this parking is to be provided.</p> <p>8.28 - Motorbike parking if provided for new residential developments, should be in the same vein as 8.29 provides for cycles - secure locker type parking with secure anchors.</p>	Change to be made in part	<p>Unnecessary to specify in the SPD what is meant by gross floorspace.</p> <p>With regard to car parking standards in Town/City Centres, these standards will be applied as a starting point. If however a developer considers they need less car parking (as a result of existing public car parking etc) then the current policy allows for this subject to the submission of supporting evidence.</p> <p>Previous standard for B8 warehouses larger than 2,500 to be added.</p> <p>Consideration only needs to be given to 8.21, no change required.</p> <p>8.28 details that motorbike parking should be secure and covered, no change required.</p>
1002559	90			Janet Smallcombe	Tavistock Town Council	DEV29.4 – Parking provision: non-residential (EV chargingpoints)	<p>8.39 - cost should be borne by the developer or WDBC, not potential purchasers.</p> <p>8.39 - support but should be within a DPD and not an SPD.</p> <p>8.49 - support but should explain who is to provide these publicly-accessible chargingpoints, and where are they to be.</p> <p>8.49 - before cost comes to the taxpayer, it should be determined how many locals use EV's, how many tourists use EV's. Non internal combustion vehicles are the future - however EV's are yet to establish themselves as an environmentally friendly alternative, as well as the technology being very young. EVCP's in their current form could well be obsolete or unused before an acceptable uptake of EV's happen.</p>	No change	<p>Specifying the minimum amounts of EV charging infrastructure that should be provided by a development would be too much detail for Local Plan policy, and the appropriate place for it is an SPD. The costs of domestic EV chargepoints will be part of the overall cost of the developer of delivering the development, like widows, connections to the water system, etc. The cost of these cannot be extracted from the commercial transaction between the developer and the house purchaser. It is worth noting that compared to retrofitting, post-construction, the unit cost of domestic EV chargepoints is low when purchased in large numbers and installed at construction. The provision of domestic or on street EV chargepoints will not be borne by the tax payer, but by the developer and then the purchaser of the properties. Developers and Local Authorities wishing to provide or encourage the provision of EV chargepoints are aware of rapid technological and behavioural change with respect to zero emission vehicles, and understand the risk of technology / behaviour overtaking the type and distribution of EV chargepoints. This is unavoidable and the need to decarbonise mobility to respond to the climate emergency demands rapid creation of a viable EV charging network. New development must contribute appropriately to this network.</p>

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1002559	91			Janet Smallcombe	Tavistock Town Council	DEV29.7 – Travel Plans	8.62 - travel plans in paper form are a waste of taxpayers money - part of moving into a new home is getting out and learning about your new community - if determined to keep this option, then look at making it an 'opt in scheme'	No change	The production and distribution of paper based materials for inclusion in travel plan welcome packs are paid for by the developer.
1002559	92			Janet Smallcombe	Tavistock Town Council	DEV29.8 – Permeability	8.67 states that existing routes should be improved and well lit. There is no mention of where the money will come from to finance this.	No change	If the lighting of cycle routes has to be improved in order to facilitate development then this would be enabling works and therefore secured from the development it is serving.
1002559	93			Janet Smallcombe	Tavistock Town Council	DEV29.9 – Strategic transport infrastructure	8.78 - the use of 'any new development' is far too sweeping. It would be better to incorporate the qualification in para 111 of the NPP, "All developments that will generate significant amounts of movement should be required to ..." 8.81 - A 20 mph limit is to be welcomed but who is going to enforce it? 8.89 - Section on EWI is out of place and sounds like it's creating new policy?	No change	Officers disagree, this should apply to any development - not just those generating significant numbers of trips. All highway speed limits are enforced by the police. The content relating to EWI has been put here because incorrect or inappropriate design and installation can impact on the safe use of the highway.
1002559	48			Janet Smallcombe	Tavistock Town Council	DEV3 and DEV4 - Sports facilities and playing pitches	Wants clarification regarding loss of sports facilities/pitches. Query the status of Playing Pitch Strategies and incorporation in SPD.	Change to be made	DEV3.2 states the exceptions that would allow the loss of sports and recreational facilities and land. If the development does not meet these then it should not go ahead. However, a judgement is always required in making decisions. 3.69 The Playing Pitch Strategies and Sports and Leisure Facilities Plans are part of the evidence base to the JLP. Text to be added to improve clarity. 3.69 There is no specific definition of sports and recreation facilities and land in the NPPF. We would consider sports and recreation facilities covered in robust and up to date evidence bases for Sport e.g. Playing Pitch Strategies/Plans, Sports and Leisure Facilities Plans and other Open Space Plans. The Councils would also seek advice from Sport England where appropriate.
1002559	50			Janet Smallcombe	Tavistock Town Council	DEV3.2 - Water and waterside access	Why would "embracing" not be supported?	Error/clarification to be accommodated	The word 'embracing and 's' at the end of impedes are errors in the consultation draft which will be amended.
1002559	51			Janet Smallcombe	Tavistock Town Council	DEV3.3 – Public rights of way and bridleways	Guidance on Public Right of Way needs to be stronger with stronger terminology setting out the circumstances in which the local planning authorities will actively pursue new PROW in connection with developments.	No change	The SPD's remit is to establish the principle that opportunities for network enhancement should be sought within developments not to determine the detail of all potential enhancements in advance of development coming forward. Such work is out of scope for the SPD.
1002559	95			Janet Smallcombe	Tavistock Town Council	DEV31.2 – Providing integrated facilities in new developments	8.105 - Does WDBC fall foul of EPA 1990, with regards to 8.104, with their current policy of not having wheelie bins. 8.106 - (Table 34) Is this a way of introducing wheeled bins into West Devon? 8.110 - Amend paragraph to finish off with the words, "... plastic, paper, card, packaging and garden waste." 8.116 - Roads/car parks in Tavistock should be utilised for recycling receptacles. 8.124 - This paragraph does not reflect collection system in West Devon.	Change to be made in part	8.105 - No, WDBC does not fall foul of EPA 1990, with regards to 8.104. 8.106 - There are no plans to introduce wheeled bins into WD. 8.110 - Change to be made to include this list. 8.116 - No change, the text of the SPD clarifies the circumstances whereby this might be possible. 8.124 - comment noted.

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1002559	99			Janet Smallcombe	Tavistock Town Council	DEV32.1 – Minimising natural resources in development	Supports aims of policies DEV32. Clarification needed if s106 contribution in TTV policy area for a district wide network will only be used in the TTV policy area.	No change	S106 will always be related to the area set out and locally applied.
1002559	100			Janet Smallcombe	Tavistock Town Council	DEV32.2 – Taking account of the impact of climate change	Supports the Diagram in 9.5 but it is wrong and needs to be changed. Clarification needed if a development that does not include a design and access statement, satisfying climate change requirements that it will not be registered? If so, SPD needs to clearly say so and would support.	Change to be made	Noted. Changes made to clarify information to be submitted when no design and access statement is required.
1002559	101			Janet Smallcombe	Tavistock Town Council	DEV32.3-DEV32.6 – Energy statements and methodology	Supports 9.15 however not a requirement for West Devon's Validation list. 'Major' needs defining in this list and SPD. Clarification needed why paragraph 9.21 refers just to Plymouth and if so why not the entire plan area? If part of plan 9.21 needs to be annotated to show which parts it applies to.	No change	The policy applies to the whole JLP area and is clear where (e.g. DEV32.6) there is specific evidence relating to Plymouth.
1002559	49			Janet Smallcombe	Tavistock Town Council	DEV4 - Playing pitches	Clarification over meaning of 'larger sites' and when details will be required.	No change	3.80 Sites where this is required are set out in the allocation policies of the JLP as mentioned in this paragraph. 3.85 It is acceptable for these details to be provided as part of a condition if they have not already been provided.
1002559	53			Janet Smallcombe	Tavistock Town Council	DEV8.1 – Overall housing mix	4.17 - support for homeworking, but SPD will only encourage applicants to understate the size of the houses applied for by one bedroom. 4.18 - SPD should define what is meant by major application. 4.19 - census data is too old. A more up to date database based on the SHMNA should/could be used? 4.23 - affordable housing threshold is 6 and over and same threshold should be used in this case otherwise the mix requirement will need to have a different basis for 5-home schemes (without considering affordable housing needs) and 6+ schemes (including affordable housing needs). SHMNA requirements will need to be updated as each development is completed. 4.24 - DEV8 does not give the authority licence to adjust the data unilaterally. On the contrary, para 4.22 states that the data are the starting point for a 'discussion'. Clarity should be given on what the basis for decision/discussion is to be. So far, Chapter 4 has pointed to the census, the ONS estimates, the SHMNA or (preferably) the SHMNA updated annually by completion information 4.26 - Does the ONS data show current housing mix within a settlement? Who will define 'within' if there is no Settlement Boundary? 4.27 - confused about this paragraph. If there is a pre-existing oversupply of 5 bedroomed houses in a settlement and a proposal comes forward for 5 bedroomed houses, does this mean that the application would be approved if the applicant proposes to enter into an obligation to sell them to local people? Would such an obligation meet the CIL	Change to be made in part	4.17 - comment noted. 4.18 - It is not deemed necessary for the SPD to define what is meant by major development 4.19 - localised updates to housing stock done by LPA on a case-by-case basis text updated 4.23 no change required as long as up-to-date data is used 4.24, the SPD is consistent with JLP in that it says housing mix will be considered on a case-by-case basis. The most relevant 'local housing data' will be applied to each application - the SPD doesn't need to try and define exactly what the most relevant data is 4.26 - the LPA will produce an up-to-date baseline for each location on a case-by-case basis, but is clear that data will be used at town or parish level 4.27 no change required, officers believe this paragraph is self-explanatory 4.30 small text clarification

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							Tests? 4.30 - what does 'attributes ... suited to specific needs' means? Also, as the LPAs have said they will accept a room described as a study or office, then these could easily be bedrooms in disguise.		
1002559	105			Janet Smallcombe	Tavistock Town Council	Development in the countryside (TTV26)	Criticism of how the SPD is elaborating on the settlement hierarchy and the judgement as to where the countryside is in relation to the built form.	Change to be made	It is considered appropriate to provide additional guidance regarding how and where policy TTV26 will be applied. However, as part of a wider review regarding TTV26 guidance, para 11.44 has been reviewed and amended.
1002559	74			Janet Smallcombe	Tavistock Town Council	Economy (DEV14-DEV19)	The SPD should set out a delivery mechanism for employment land. The absence of such a mechanism specifically affects the JLP's strategy for Tavistock. The sustainability strategy for Tavistock relies on the delivery of employment uses as well as residential development.	No change	The role of the SPD is not to set out a delivery mechanism for employment land.
1002559	38			Janet Smallcombe	Tavistock Town Council	General	The use of third party documentation is poor practice as the local planning authority has no control as to whether these are updated or not. It is unreasonable to expect case officers, applicants, members of the public and town/parish councils to have to refer to third-party documentation in order to understand what the SPD means. If elements of third-party documentation are to be implemented by the local planning authority, then these should be incorporated explicitly into the SPD. If the documents are referred to simply for the general interest of the reader, then they should be identified under a heading such as 'Further Reading' and made clear they're not part of the SPD.	No change	Officers believe the cross-reference to external guidance is useful and, where practicable, has already been incorporated into the SPD.
1002559	39			Janet Smallcombe	Tavistock Town Council	General - Settlement Boundaries	Proceed with a DPD identifying settlement boundaries.	No change	The issue of settlement boundaries was dealt with through the examination process of the JLP. The Inspectors were content that the LPAs would consider preparing a settlement boundary DPD - however, if the Inspectors had felt that the delivery of the spatial strategy of JLP depended upon boundaries being in place, the LPAs would have been forced to do so before the JLP was found sound. Monitoring of decisions and appeals regarding edge of settlement sites have not identified an issue with how the JLP considers this issue. Paragraph 5.5 of the JLP provides clarity, in that countryside is 'beyond the built form' of a settlement. The SPD is clear in paragraph 11.43 that professional judgement will determine what forms part of the built form, and is within a settlement, and when a proposal is considered to be beyond the built form. The LPAs will continue to monitor the application of policies that require an assessment of whether a site is within a settlement or within the countryside, the decisions made on the basis of this assessment, and relevant appeal decisions.
1002559	86			Janet Smallcombe	Tavistock Town Council	Green and play spaces (DEV27)	Supports the aims of DEV27.	Noted	Support welcomed.
1002559	40			Janet Smallcombe	Tavistock Town Council	Introduction	The World Heritage Site SPD was adopted prior to the Joint Local Plan and needs to be updated and re-adopted.	No change	The SPD's purpose is not to update the WHS SPD nor the Tavistock CAMP as they are their own documents

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							Questions the status of the current Tavistock Conservation Area Appraisal and Management Plan. Questions the status of the SPD as it was not assessed against the current NPPF.		and they are referred to in the SPD to help explain the context. The SPD was assessed under the 2019 NPPF.
1002559	78			Janet Smallcombe	Tavistock Town Council	Landscape character (DEV23)	Clarification if the first bubble is meant to exclude World Heritage Sites? Recommends the SPD recognising the importance of World Heritage Sites in the SPD.	Change to be made	Landscape character section to be reviewed and updated accordingly to incorporate World Heritage Sites and cross reference other policies.
1002559	103			Janet Smallcombe	Tavistock Town Council	Managing flood risk and water quality impacts (DEV35)	In support of para 9.65. However would welcome more guidance on minimising surface water run-off without adverse impact on water quality.	Noted	Specific reference to and guidance on preventing adverse impact on the water environment is made within the LFRMS.
1002559	94			Janet Smallcombe	Tavistock Town Council	Meeting the community infrastructure needs of new homes (DEV30)	Tavistock Town Council (TTC) supports the statement at para. 8.93 but stresses that Tavistock is subject to significant housing development and raises concern about whether the necessary levels of infrastructure to mitigate the impacts of this development are being or will be provided. TTC anticipated that the SPD would set out the mechanisms whereby infrastructure will actually be provided and is disappointed that this is not the case. The TTC invites the local planning authorities to review the draft SPD with a view to setting out the mechanisms for provision before the situation reaches crisis point. TTC asks that para. 8.93 is amended to add the word 'substantial' so that it reads '...new housing development should make a substantial contribution towards necessary improvements in community infrastructure.' TTC has also commented in relation to 'Digital connectivity' seeking a revision to para 8.96 to clarify where and when the requirement for future-proof digital connectivity will be required.	No change	The SPD builds upon and provides more detailed guidance about policies in the Joint Local Plan. It does not form part of the Joint Local Plan itself but will be a material consideration in determining planning applications. It isn't the SPD's role to set out mechanisms whereby infrastructure will actually be collected. The councils are required to prepare Infrastructure Funding Statements from December 2020. Infrastructure funding statements are required to set out the infrastructure projects or types of infrastructure that the authority intends to fund, either wholly or partly, by the levy or planning obligations, though this will not dictate how funds must be spent and in turn collected. Reference to 'substantial' contributions is not considered to be appropriate in all situations and will depend on the size and scale of development proposed. Development proposals are considered on a case by case basis with regard for capacity/need issues. Not all developments may be required to provide future-proof digital connectivity hence use of the word should rather than must. It is not the function of the SPD to set out exactly where and when new provisions might be required.
1002559	81			Janet Smallcombe	Tavistock Town Council	Nationally protected landscapes (DEV25)	Clarity is needed on whether the setting of the National Park is a consideration or not.	Change to be made	Reference to Dartmoor National Park to be added.
1002559	75			Janet Smallcombe	Tavistock Town Council	Place shaping and the quality of the built environment (DEV20)	Suggests strengthening requirement for Design Codes. Suggests more explicit detail on when Design Review Panels will be used.	Change to be made	Amendments to be made re. Design Codes and Design Review Panels.
1002559	108			Janet Smallcombe	Tavistock Town Council	Planning obligations, the Community Infrastructure Levy and development viability	Could the SPD indicate which of the local planning authorities intend to implement CIL and which intend to continue with S106 Obligations.	No change	Paragraph 12.16 of the SPD indicates that CIL was introduced through the Community Infrastructure Levy Regulations 2010(225) and currently only operates in the Plymouth administrative area. All councils will continue with the S106 Obligations process.
1002559	104			Janet Smallcombe	Tavistock Town Council	Prioritising growth through a hierarchy of settlements (TTVI)	Representation urging LPAs to write and adopt a settlement boundaries DPD.	No change	The issue of settlement boundaries was dealt with through the examination process of the JLP. The Inspectors were content that the LPAs would consider preparing a settlement boundary DPD - however, if

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									the Inspectors had felt that the delivery of the spatial strategy of JLP depended upon boundaries being in place, the LPAs would have been forced to do so before the JLP was found sound. Monitoring of decisions and appeals regarding edge of settlement sites have not identified an issue with how the JLP considers this issue. Paragraph 5.5 of the JLP provides clarity, in that countryside is 'beyond the built form' of a settlement. The SPD is clear in paragraph 11.43 that professional judgement will determine what forms part of the built form, and is within a settlement, and when a proposal is considered to be beyond the built form. The LPAs will continue to monitor the application of policies that require an assessment of whether a site is within a settlement or within the countryside, the decisions made on the basis of this assessment, and relevant appeal decisions.
1002559	83			Janet Smallcombe	Tavistock Town Council	Protecting and enhancing biodiversity and geological conservation (DEV26)	Support for DEV26	Noted	Support welcomed.
1002559	42			Janet Smallcombe	Tavistock Town Council	Protecting health and amenity (DEV1)	<p>3.11 - DEV1.3 relates specifically to developments for which an ES is required and for which significant health impacts have been 'scoped in', not to applications in general. It may be that the Rapid HIA tool is appropriate in some circumstances but that is down to the EA process and should not be specified in the SPD.</p> <p>3.14 - Who in Public Health is to be contacted?</p> <p>3.15 - information on PADS seems to be additional policy.</p> <p>3.16 - Average walking speed is 100m per minute. Is it viable or reasonable to require this? Elsewhere the JLP requires RIA for town centre uses of more than 250 sq.m. same should be here. What does "and/or" mean in the context of the penultimate bullet point?</p>	No change	<p>Public Health would be reviewing the documents, and would reduce burden on team to find this document and to make it clearer to officers how health is being assessed in planning applications. If draw it in one document it's easier. It's already done elsewhere. Contact details of Public Health colleagues are available via each local authority.</p> <p>The inclusion of the guidance for PADs helps meet the objectives of policy DEV1 and is therefore not considered to be additional policy.</p> <p>The three minute pick up and return time indicates the optimum timeframe for early defibrillation. This is guidance and will be applied reasonably, bearing in mind that in such a situation anyone collecting a PAD is likely to be travelling faster than average walking pace. The size of retail premises requiring a PAD is 500sqm and it is considered that requiring anything lower than this may be disproportionate.</p>
1002559	70			Janet Smallcombe	Tavistock Town Council	Protecting local shops and services (DEV18)	The meaning of this paragraph 5.52 is obscure. How will location alter the local planning authority's considerations	Error/clarification to be accommodated	Change to be made to improve clarity.
1002559	73			Janet Smallcombe	Tavistock Town Council	Provisions for local employment and skills (DEV19)	Suggest inclusion of the (Construction) Employment and Skills Plan guidance.	Change to be made	Link to be inserted to local guidance.
1002559	107			Janet Smallcombe	Tavistock Town Council	Specific design details for Tavistock (TTV16 and TTV17)	Objects to additional guidance provided for policies TTV16 and TTV17.	No change	The previously adopted South West Tavistock Masterplan SPD provided the content for TTV16 and TTV17 guidance within the JLP SPD. The JLP only refers to the design and delivery sections of the old SPD as being of relevance to the delivery of TTV16

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									and TTV17. Upon review of the old SPD it was considered that much of the document was already out of date and had been superseded by extant planning consents. The old SPD was also reliant upon policy hooks from the old WDBC Core Strategy, and these documents cannot simply be re-adopted.
1002559	67			Janet Smallcombe	Tavistock Town Council	Supporting the rural economy (DEV15)	5.16 - Proposed Enterprise Strategy and Action Plan should have status in the planning process. When published, it should be incorporated into this SPD.	Not applicable	This point will need to be considered if/when the document is published and the SPD is being reviewed.
1002559	41			Janet Smallcombe	Tavistock Town Council	Sustainable Development and the Climate Emergency	Policies SPT1 and SPT2 are not being implemented correctly. Potential conflict with TTV26 and the determination of some planning applications eg Hurdwick Golf Club. No reference has been made to Table 3.2 of the JLP. The SPD should set out more clearly how policies SPT1 and SPT2 are being applied	Not applicable	This comment relates to how the JLP is implemented rather than the specific guidance within the JLP.
1002559	87			Janet Smallcombe	Tavistock Town Council	Trees, woodlands and hedgerows (DEV28)	Loss of ancient woodland should not be contemplated at all. Supports mitigation hierarchy, however does it relate to unprotected trees?	No change	7.162 Although loss of ancient woodland is to be avoided wherever possible the NPPF does state that where there are 'wholly exceptional reasons' it can be removed. The SPD cannot therefore override the NPPF. 7.173 The mitigation hierarchy applies to all trees on a site whether protected or not. It will ensure, where possible and appropriate, that existing trees are retained whether protected or not. Where this is not possible new planting as detailed in this section will be required.
1002559	106			Janet Smallcombe	Tavistock Town Council	TTV26.1 – Isolated development	Repetition of other comments, requiring the LPAs to proceed with a settlement boundaries DPD.	Change to be made in part	The SPD cannot reverse a planning decision that has already been made by the LPA. However, amendment to be made to reflect correct working in NPPF.
1003215	510			Jon Capel	Harrison Sutton Partnership	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during the JLP examination, in particular use of SHMNA data. High value areas were considered during the examination and removed from the draft plan.
1003215	511			Jon Capel	Harrison Sutton Partnership	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1003308	4			Malcolm Nettleton		Economy (DEV14-DEV19)	The SPD should incorporate a proposal in support of the reopening of the Northern Rail Route.	Not applicable	The purpose of the SPD is to amplify and give guidance on the JLP policies only.
1003640	383	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Affordable Housing (DEV7-DEV9) - Affordable Housing tenure mix	The affordable housing tenure mix of 65 per cent social rent and 35 per cent affordable home ownership does not feature in the JLP and is applicable for the whole Plan Area. The SPD should clarify what evidence this is based on and explain why the same tenure split is expected for all affordable housing across the three different authorities. Previous tenure sought in West Devon set out in the Affordable Housing Code of Practice SPD (adopted 2012) was 80 per cent social rent and 20 per cent affordable for sale on shared ownership.	Change to be made in part	The wording for guidance on affordable housing tenure mix is for guidance only and to be used as a starting point for negotiation. However, officers have agreed to soften the wording so this is made clearer.
1003640	382	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Affordable Housing (DEV7-DEV9) - DEV8.2	Paragraph 4.77 does not appear to be consistent with DEV8.2 as it sets out requirements for on-site affordable housing whereas Policy DEV8.2 relates to providing offsite	Change to be made	Change made as the content was not in the correct order, and did not correlate directly with the JLP policy.

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							provision of affordable homes for sites within rural areas which have special designations. This should be clarified and amended.		
1003640	385	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Affordable Housing (DEV7-DEV9) - Off-site provision and commuted sums in the Plan Area	4.111 relates to off-site provision of affordable housing in the TTV. Bullet point 3 should make reference that for sites of between 11 and 14 dwellings or where robustly justified, the requirement can be met by providing an off-site provision or commuted payments in lieu of on-site provision to deliver affordable housing elsewhere in the policy area. This will ensure consistency with Policy DEV8.	No change	Not applicable for TTV in terms of 11-14 dwelling issues.
1003640	396	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DELI.5 – Development viability	Important that the DELI section is checked for consistency with the viability requirements in the NPPF. It is noted that CIL currently operates in the Plymouth administrative area only. The SPD should be updated to take into account any future changes to the situation in West Devon and South Hams.	No change	Officers believe this section is compliant with the NPPF.
1003640	384	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV10.3 – Affordable housing design considerations in the Plan Area	Paragraph 4.97 this paragraph should also refer to site-specific circumstances which sometimes make it difficult for proposals to adhere to cluster requirements of affordable homes, to ensure there is flexibility.	No change	Officers consider that the use of the phrase "not normally exceeding" in para 4.97 provides the flexibility that the consultee is seeking to allow for site specific circumstances.
1003640	386	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV10.5 – Space standards and outdoor amenity space	Accompanying text should refer to the evidence Table 11 is based on.	No change	The figures are based on previous guidance and have been used by officers and tested for a number of years.
1003640	378	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV2.1 and DEV2.2 – Air	Paragraph 3.25 is not consistent with DEV2. Paragraph 3.40 should be expanded to clarify which planning applications are relevant.	No change	The SPD relates to DEV2.1 as well as DEV2.2, therefore the wording is correct. Where a noise impact assessment is required, this will be detailed in the Local Validation List.
1003640	390	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV27.3 – Accessible green and play spaces	Paragraph 7.132 should be clear that green space can be delivered through on-site provision or financial contributions to off-site provision where appropriate to be consistent with Policy DEV27. Paragraph 7.135 provides no explanation to what a sufficient scale is. It should be noted that not all developments can accommodate LEAPS and NEAPS, and LAPS may be more appropriate for smaller developments. This should be clarified and the play space requirements should be properly set out in relation to the different scales of development.	Noted	No action required. The JLP policy already sets this out and therefore there is no need to repeat it within the SPD. It won't be solely the scale of the development that will drive the play space provision, but also what provision is already present in the area; therefore it was felt that defining specific play space requirements per scale of development was unnecessary.
1003640	379	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV8.1 – Overall housing mix	Paragraph 4.18 - may not always be possible to achieve this requirement. Wording should be amended to put in some flexibility.	Change to be made	Agree to remove para 4.18.
1003640	380	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV8.1 – Overall housing mix	Paragraph 4.24 - it is unclear where this is referred to in DEV8 and it should be clarified.	No change	The LPAs are defining what is considered to be an imbalance - which is referenced in policy DEV8.
1003640	381	Ian Jewson	Walsingham Planning		Bovis Homes Limited	DEV9.4 – Accessible housing	Paragraph 4.55 should be amended to include the phrase 'where possible' at the end of the sentence as it is not always possible to achieve elements within the standards.	Change to be made	Officers consider that the addition of the wording in para 4.55 as suggested by the consultee would be helpful, and have therefore done so.
1003640	374	Ian Jewson	Walsingham Planning		Bovis Homes Limited	General	Suggest the SPD is shortened where possible. The SPD should not repeat information which is already set out in other planning documents which are available to view.	No change	There is already a lot of cross-referencing to external documents within the SPD. Any information which has been repeated has been done deliberately for clarity.

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							Instead of repetition there should be additional cross reference which will make the SPD easier to navigate.		
1003640	376	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Introduction	Suggest further information on how third parties will be informed of any future changes to the SPD and further consultations is included.	No change	The consultation process followed is in line with national guidance and the current Statement of Community Involvement.
1003640	375	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Introduction	Not clear of the status of the Developer Contributions Evidence Base.	No change	The Developer Contributions Evidence Base is an evidence base document that supports the SPD in informing policies of the Joint Local Plan and this is made clear in both the SPD and the evidence base. It would be a material consideration – as would all documents or factors which have a bearing upon a decision.
1003640	393	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Managing flood risk and water quality impacts (DEV35)	Much of the section relating to DEV35 is already set out in the PPG, suggest shortening the section and cross referencing to avoid repetition.	No change	Officers believe the reference to the NPPG is useful.
1003640	388	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Natural environment (DEV23-DEV28)	Suggest this section is reduced where possible and refer to relevant guidance and best practice rather than repeating existing information available.	No change	The level of information provided sets out relevant information for applicants within the JLP area.
1003640	387	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Place shaping and the quality of the built environment (DEV20)	Suggests clarifying what "large sites" means in the context of seeking design codes.	Error/clarification to be accommodated	It is difficult to set a specific figure on the size of site which would trigger design codes being sought, however a slight change in wording will be included to remove the reference to size and allow the requirement for codes to be assessed, including with reference to the emerging National Model Design Code.
1003640	395	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Planning obligations, the Community Infrastructure Levy and development viability	Evidence should be provided to support the thresholds.	No change	The thresholds provided are stated as being 'indicative' and at para. 12.28 it is stated that the thresholds are a guideline only. The thresholds are based on those that are currently applied in the 3 councils.
1003640	389	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Protecting and enhancing biodiversity and geological conservation (DEV26)	Acknowledges that biodiversity net gain may be nationally mandated, and that SPD/guidance should be updated locally accordingly.	Noted	The SPD has been written based on best understanding of what may ultimately be mandated nationally (and the previously proposed Environment Bill which has since been withdrawn due to the General Election). The approach of the SPD is likely to remain consistent with any resurrected Environment Bill, however in the likelihood that the Government mandate Biodiversity Net Gain at a higher level than anticipated (for example) this would supersede the SPD.
1003640	377	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Protecting health and amenity (DEV1)	Recognises the importance of PADs for new developments but this is likely to be a requirement under a separate process and it is unclear how this relates to the planning system	No change	Publicly accessible defibrillators are useful facility to aid in instances of Sudden Cardiac Arrest and other health risks/ incidents. Their inclusion helps meet the objectives of the policy DEV1 and as such the guidance is retained.
1003640	391	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Specific provisions relating to transport (DEV29)	Table 33 - suggest evidence is provided which has informed the minimum provision requirements.	No change	The minimum EV charge point provision set out in Table 33 was informed by careful consideration of a range of alternatives by officers from PCC and SHWD, and took into account a range of evidence sources, including requirements used by other LPAs.

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1003640	394	Ian Jewson	Walsingham Planning		Bovis Homes Limited	TTV27.2 – Housing mix	Update guidance wording to accurately reflect the wording in TTV27	Change to be made	Agreed to update the paragraph with references to land area.
1003640	392	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Waste management (DEV31)	Requirements on design and access for refuse vehicles is normally included in relevant highway guidance and therefore reference could be made to this instead of repeating.	No change	Officers believe the guidance here is helpful to officers and developers.
1004329	115			Mr John Birch	SHDC	DEV1.3 – Health Impact Assessments	Consideration needs to be given to including protection against the detrimental effects on local health services such as doctors' surgeries and local health centres as a result of an increase in development in some areas within South Hams. By way of example the increase in the number of retirement homes, care homes and nursing homes results in an increasing burden on the finances of doctors' surgeries and health centres and thus threatens their viability.	No change	This topic is covered by the HIA process as described in the SPD. Health Needs Assessments (HNAs) highlight these issues in particular - Pharmaceutical Needs Assessment which is published every 3 years and contains predictions of primary care needs based on 5yr Land supply report.
1004329	113			Mr John Birch	SHDC	Meeting housing needs in rural areas (TTV27)	Ensure a mix of affordable housing types are delivered, not just discount open market dwellings.	No change	Paragraph 11.67 is clear that the range of affordable housing types and tenures will need to accord with needs assessments and waiting list data held by the relevant Local Authority.
1006182	398			Mrs Hilary Winter	Devon Countryside Access Forum	DEV3.3 – Public rights of way and bridleways	Guidance should recognise the importance of connecting to recreational trails, as well as public rights of way, and the contribution this can make to sustainable transport. Recreational trails, (such as the Granite Way and Drakes Trail), may include sections which are legally defined as public rights of way but often these routes are not public rights of way and therefore need to be mentioned separately. Concerned that the role of negotiating with landowners has not been recognised in the SPD. Suggest changes and incorporation of a decision statement into the SPD. The Position Statement makes reference to Natural England's Green Infrastructure standards which is attached.	Change to be made	Reference to working with other landowners and linking to other trails to be added.
1007871	189			Mr Tom Lowry		Meeting housing needs in rural areas (TTV27)	Comment regards the application of TTV27, and whether it could be used to bring forward single-plot exception sites, and under what circumstances.	No change	The SPD cannot redraw the settlement hierarchy, or proclaim new settlements as being 'sustainable' Paragraph 11.62 creates flexibility in terms of where TTV27 sites can come forward, and is clear that TTV27 sites can also come forward outside of named sustainable settlements.
1007871	214			Mr Tom Lowry		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1008948	9			Mr Graham Coiley		Specific design details for Tavistock (TTV16 and TTV17)	The comment does not relate to SPD content but is instead concerned with more general matters relating to wider development within Tavistock.	No change	The information regarding TTV16 and TTV17 has been extracted from the previously adopted South West Tavistock Masterplan SPD, and does not relate to any additional or alternative sites. Housing needs assessments are not undertaken on a settlement basis, but on a housing market area basis. The extent to which Tavistock is planned to grow can be seen by looking at the identified allocated sites within the JLP.

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1010886	118			Mr Mike Wynne-Powell		Development in Sustainable Villages (TTV25)	Paragraph 11.38 of the SPD refers to settlement boundaries in adopted neighbourhood plans. Any reference to published development boundary maps is outdated.	No change	The JLP states in paragraph 5.155 that it does not adopt settlement boundaries. Development Boundaries are no longer a policy tool in the JLP and so no definition is required.
1016377	200			Ed Brown	Cavanna Homes	DEV10.5 – Space standards and outdoor amenity space	Paragraphs 4.136 – 4.139 - Whilst certain development locations may lend themselves to such garden sizes many won't. The NPPF requires efficient use of land and such garden sizes will lead to lower density development and the knock-on impact of requiring more housing sites/land. Land is a finite resource not always easily redeveloped. It should be efficiently used whilst of course providing adequate amenity levels. The amenity levels should be considered on a site by site basis.	No change	Paragraph 4.139 allows for flexibility to be used when considering minimum standards and to consider site specific circumstances.
1016377	197			Ed Brown	Cavanna Homes	DEV8.1 – Overall housing mix	<p>Paras - 4.13 to 4.19 - Council is trying to dictate what a developer should be building by way of open market housing to “address a re-balance ” with the assumption that big homes are causing a problem but not providing meaningful evidence to justify its stance and using too simplistic arguments. In order to be commercially viable a house builder will carry out thorough market research on each site.</p> <p>Housing mix should be provided from a commercial perspective in order to provide a variety of products to reach out to a greater market and maintain a healthier sales rate and meeting 5YLS argument. The Council and Registered Providers control what affordable housing mix is delivered. Already controls the size of houses (through the number of bedrooms) of a certain percentage. Through affordable housing the Council could seek to “re-address any imbalance” to a certain degree. However, it is important to note that affordable housing is cross subsidised through the delivery of the open market housing.</p> <p>Sites will stall meaning the Council won't meet it's 5YLS. Para 4.18 is an onerous policy. This requires the smallest type of house (based upon bed numbers) to be within 75% of the size of the large house within the same number of bed spaces. In combination with the above text the danger is that the Council enforces upon the area what it thinks is the required housing mix which may well be at odds with true market demand.</p>	Change to be made in part	The council has a duty to meet our identified housing needs, not to build only what the market demands. The market caters for buyers with economic choice, and the TTV is an affluent area, but wealth is not held equitably across the population. We have an evidence base that is showing smaller households increasing throughout the plan period, plus the highest proportion of under-occupation of our existing stock in the south-west The demographic profile of both SH & WD continues to be top-heavy, showing an ongoing deficit of young people and young families. We need a long term strategy for building resilience in our communities, not a short-term aim to meet whatever house builders think they can sell the quickest. Para 4.18 is proposed to be removed.
1016377	199			Ed Brown	Cavanna Homes	DEV8.1 (iii) – Younger people, working families and older people	<p>Para 4.30 - onus is upon the delivery of 1 and 2 bed housing but a mix needs to be provided. The policy seems to indicate that in certain areas only 1 and 2 housing will be supported.</p> <p>Para 4.21 - talks about families being displaced. With an emphasis as suggested in para 4.30 families will be displaced in consideration of new housing delivery of solely 1 and 2 beds. Whilst well intended the Council's proposed preference of certain housing mixes may displace certain groups wanting to move into an area where no new housing of a certain bed number is being delivered. A mix of bed sizes should be provided rather than precluding 4 beds.</p>	No change	Guidance regarding housing mix is clear that the SHMNA will be used to inform appropriate mix in different locations, along with other appropriate data. No areas are expected to only deliver 1 and 2 bed properties, in the same way that the policy does not seek to prevent the delivery of 4-bed homes.

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1016377	198			Ed Brown	Cavanna Homes	DEV8.1(i) – Redressing imbalance	Paras 4.21 – 4.22 The first paragraph talks about a trend of young people and working age families being displaced. Reinforces point made above re. mix of housing needed. A housing mix to incorporate all bed sizes based on current market research rather than what has been built which does not advise on current demand must be considered.	No change	The SHMNA takes into account existing housing mix and household formation rates and sizes. An equitable mix of housing that meets the needs of newly forming households has to respond to identified housing needs, not market demand - access to housing should not be unduly limited by the economic ability of the buyer - why should people with more money have more choice of housing than people with limited financial means?
1017423	506			Mark Evans	Mark Evans Planning Ltd	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during the JLP examination, in particular use of SHMNA data. High value areas were considered during the examination and removed from the draft plan.
1017423	507			Mark Evans	Mark Evans Planning Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1040985	16			James Wells	James Wells Planning Limited	Delivering low carbon development (DEV32)	Is there a risk of the guidance at DEV32 becoming quickly outdated with technology changes?	No change	The policy is not specific in terms of the technologies to be utilised to achieve the policy requirements, providing flexibility. The applicants, through the submission of an Energy Statement can set out those appropriate to the development.
1040985	18			James Wells	James Wells Planning Limited	Delivering sustainable development in the Thriving Towns and Villages Policy Area (TTV2)	The settlement hierarchy, TTV2 and SPD content will be detrimental to rural businesses. Suggests that policy and decisions are too punitive on applications that are demonstrably reliant on the private car. Also suggests that such an approach has not been sufficiently justified.	No change	The settlement hierarchy and TTV2 have been scrutinised through the examination process, and as such have been adopted on the basis that the policies are sound and will result in sustainable development. Small businesses and tourism operators were consulted throughout the plan preparation process that established the settlement hierarchy and the spatial strategy. Planning officers both live and work in South West Devon, and to suggest that the adopted policies have no real world basis ignores this fact. The tourism industry will need to respond and adapt to the climate emergency as well as other sectors, and this includes contributing to a sustainable pattern of future development. Planning appeal APP/K1128/W/18/3217159 at Lower Leigh Farm upheld both the settlement hierarchy and approach to ensuring future sustainable patterns of development.
1040985	13			James Wells	James Wells Planning Limited	DEV10.5 – Space standards and outdoor amenity space	Guidance for outdoor amenity space is a judgement, not a formula. This causes more problems than it deals with for officers and not necessary.	No change	Officers disagree, these standards are helpful when negotiating outdoor amenity space during the planning application process.
1040985	12			James Wells	James Wells Planning Limited	General	Document is too large, prescriptive and will be outdated very quickly and covers too much material. Document could remove judgement and the ability to balance and was prepared without prior request for input from those who use the service. Question whether there has been cross-checking/cross-referencing with the local validations lists.	No change	When designing the SPD at the project stage it was decided that, rather than creating separate documents and SPDs, one document covering guidance for each policy would be more useful to the end user. The document has been designed to be easily searched so readers can find the guidance for each policy quickly. The document has also been designed in a way that it can be updated quickly if there is a change in

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									guidance/policy. The Local Validation Lists are to be updated post the SPD being adopted.
1040985	14			James Wells	James Wells Planning Limited	Landscape character (DEV23)	Guidance at DEV23 is for the local validation list.	No change	Officers disagree, this chapter provides helpful information to applicants preparing a planning application.
1040985	17			James Wells	James Wells Planning Limited	Managing flood risk and water quality impacts (DEV35)	Other guidance elsewhere and DEV35 guidance is duplication elsewhere.	No change	Officers disagree, this chapter provides helpful information to applicants preparing a planning application.
1040985	15			James Wells	James Wells Planning Limited	Nationally protected landscapes (DEV25)	AONB management plans are the reference point, does anything else add anything?	No change	Clarity on policy interpretation is provided elsewhere in the SPD.
1040985	19			James Wells	James Wells Planning Limited	TTV29.2 – Size of replacement dwelling	Questions the logic of seeking to restrict the extent of replacement dwellings.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1072792	26			Mr Richard Baker	Ringmore NPSG	DEV25.8 – Bringing forward proposals	Figure 7 on page 119 refers to the pre-2019 version of the NPPF. The up-to-date version does not list the three bullet points mentioned in the large bubble on the left hand side and therefore should be listed in the SPD for clarity or correct reference made to ensure they are included in any planning process.	Error/clarification to be accommodated	References to the NPPF to be updated.
1072792	27			Mr Richard Baker	Ringmore NPSG	Prioritising growth through a hierarchy of settlements (TTV1)	Suggested strengthening of wording requiring a tightly defined local connection for dwellings within the Undeveloped Coast policy area.	Change to be made	Agree to amend.
1093109	25			Mr Jack Aust		General	<p>Unhappy with the consultation process, the fact the document is only available online as a PDF and lack of simple guide.</p> <p>Zero carbon and the highest standards available should be applied in line with the climate change emergencies.</p> <p>Table 21 The distance to the nearest strategic space should be reduced to 750m and the distances to the natural and playable space should be reduced to 250m and 300 metres respectively.</p> <p>Clause 7.182 should be deleted. Adequate space should be allowed on site.</p> <p>Clause 8.9 Garages should not be included in OFF street parking calculations</p> <p>Clause 8.4.1 Communal charging points should be made for schemes over 20 houses rather than the 200 proposed.</p> <p>How will large sites which are developed in phases will be managed?</p> <p>Clause 8.62 Travel plans should place more onerous conditions on planning applicants rather than being just a tick box exercise as at present.</p> <p>Section 9 Carbon fuelled peak lopping generating stations should be banned in accordance with the climate change crisis.</p> <p>I could not find anything about the provision of seating benches. In order to encourage people to walk there should be a requirement to provide suitable benches every 200 m</p>	Change to be made in part	<p>The consultation process followed is in line with national guidance and the current Statement of Community Involvement.</p> <p>Climate Emergency - the SPD can only provide guidance on adopted JLP policies with were written before the climate emergencies were declared.</p> <p>Table 21 - these thresholds are adopted in the JLP and its evidence base and can't be changed through the SPD.</p> <p>7.182 - whilst the preference, is for on-site, it can't always be guaranteed.</p> <p>8.9 - officers disagree and garages should be considered as part of off-street parking calculations and the SPD gives flexibility to consider this on a case by case basis</p> <p>8.62 - the implementation of travel plans will be considered through the planning process</p> <p>8.4.1 - text amended so applications will be considered on a case by case basis.</p> <p>Officers disagree that the SPD should be as prescriptive to state the amount or frequency of street furniture. This needs to be considered holistically as part of masterplans, ensuring other factors are considered in the planning balance where they can be considered on a case-by-case basis to ensure there are no inadvertent negative impacts.</p>

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							on spine roads within a development and along routes to play areas and shops etc.		
1094777	437			miss Sarah Linton		TTV29.2 – Size of replacement dwelling	Support the threshold restrictions to replacement dwellings and extensions in the countryside.	Noted	Support welcomed.
1094862	22			Mr Martin Johnson	Kingsbridge Town Council	APPENDIX 4: Primary shopping boundaries and frontages	The Primary Shopping Area shown in the SPD for Kingsbridge does not include several parts of the town where shops are situated. Conversely, Ebringdon Street, which does not have any shops, has been included.	No change	The Primary Shopping Boundaries are defined on the adopted proposals map which forms part of the JLP and as such cannot be amended through the SPD.
1095108	328			Mr Richard Boyt	South Hams Planning	DEV10.4 – Residential annexes	Annexes cannot and should not be refused 'in principle', otherwise developers will instead construct outbuildings using Part I (Class E) Permitted Development Rights.	No change	The SPD does not seek to refuse annexes in principle. Rather it seeks to resist annexes that demonstrate little dependence on the main dwelling i.e. are self-contained. Government Technical Guidance for Householders, supported by appeal decisions, supports the view that 'a purpose incidental to a house [a requirement of Class E] would not cover normal residential uses, such as separate self-contained accommodation or the use of an outbuilding for primary living accommodation such as a bedroom, bathroom, or kitchen'. As a result, Class E does not allow for use as primary living accommodation, and does not provide developers with an alternative route to the provision of self-contained annexes.
1095108	329			Mr Richard Boyt	South Hams Planning	DEV10.5 – Space standards and outdoor amenity space	If a dwelling is already substandard in terms of space, will the policy weigh in favour of redevelopment or extension to make it bigger, even if that is over 50% in floorspace growth? Garden Space should be based on bedrooms or floorspace and not house type. Amenity space should be related to occupier use and not building type. Garden space should be a design requirement as part of masterplanning and not a general requirement.	No change	Compliance with NDSS, or uplift to NDSS compliance from a sub-standard dwelling, will not over-ride other policy requirements such as TTV29. Paragraph 4.139 allows for flexibility to be used when considering minimum standards and to consider site specific circumstances.
1095108	333			Mr Richard Boyt	South Hams Planning	DEV29.4 – Parking provision: non-residential (EV charging points)	Is one EV car point going to be consistently applied to all new development?	Noted	Yes, for all residential developments with a driveway or garage one dedicated, standard EV chargepoint will be provided at / within each property. These charging units are bespoke domestic household charging units, which are typically mounted to an external wall or an internal garage wall and are smaller and less visually obtrusive than on street public charging infrastructure.
1095108	332			Mr Richard Boyt	South Hams Planning	DEV29.5 – Other parking facilities (Cycle parking)	Cycle parking isn't relevant in the TTV.	No change	We are not aware of any evidence to suggest that cycle parking is not relevant in these areas and current lockdown situation has highlighted the need to build in better cycle storage options for new dwellings.
1095108	334			Mr Richard Boyt	South Hams Planning	DEV29.7 – Travel Plans	Travel Plans in rural areas have had their day and have been consistently shown not to work. It should be clear that these are not appropriate for development in the TTV.	No change	Officers disagree that Travel Plans in rural areas are or are no longer appropriate. Travel in rural areas can be problematic for those without a car. Travel plans are vital in any area as they are a mechanism to ensure a development is accessible by sustainable means. In rural locations they could be a means to protect rural bus and rail services. Visitor/Leisure developments in particular should be considered as likely to require a

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									travel plan to minimise transport impacts on the surrounding area. With the recent adoption of climate emergencies in both SH and WD, we will see increased scrutiny on the carbon cost of new development, and this includes understanding the potential impacts of newly forming travel patterns. As per NPPG and input from DCC, we will continue to require travel plans when it is considered appropriate.
1095108	325			Mr Richard Boyt	South Hams Planning	DEV8.1 – Overall housing mix	<p>4.13 to 4.15 – the Council's focus is on big homes causing the problem, not the lack of small homes.</p> <p>4.16 – The Council choose bedrooms as the unit of house size however Council's can't control bedrooms. Floorspace is the only imperfect answer if the Council want to control house size.</p> <p>4.17– One study room is allowed in every new proposal, although the need for young people or old people to have a study for home working is debatable. The Council then describe what is and isn't a bedroom, which is way too tricky to enforce. It is unworkable.</p> <p>4.18– The Council are trying to control the size of new major-scale house building in a very complicated manner, which will probably be loopholed over time.</p>	Change to be made	4.14 has been amended to add clarity. 4.16 - number of bedrooms is identified within the evidence base, hence the use of that metric in policy and guidance. 4.17 each case will be dealt with on its merits. Propose removing para 4.18
1095108	327			Mr Richard Boyt	South Hams Planning	DEV8.1 (iii) – Younger people, working families and older people	<p>4.30 - paragraph is misleading. There is greater need for 4 bedroom houses than 1 bedroom houses according to the SHMNA. The real requirement in the SHMNA is for medium large market housing and small and big affordable housing.</p> <p>Council approach is based on the false assumption that the rich and second home owners are buying the best houses and forcing out the poor locals.</p> <p>Aside from the most desirable locations, house prices are broadly reflective of the rest of South Devon. Engineering individual parishes to rebalance house types is too prescriptive and pointless. The number of new builds is so relatively low as a proportion of a parish's housing stock, even after 50 years the imbalances would remain imbalanced.</p> <p>No evidence that supplying smaller or cheaper housing will repopulate parishes with local families, the young and the old. Bigger, more expensive housing has a part to play in the housing mix and is often the best solution for sustainable sites that become available. The LPAs should rely on major and affordable housebuilding to redress imbalances, ensuring local new house supply serves local people's demands.</p>	No change	4.30 doesn't only refer to 1-bed properties, instead it states that an increase in smaller units (1 and 2-beds) accords with evidence of newly emerging household types and sizes. Rep seems to suggest that local housing needs should only be met through major housing schemes or through affordable housing products. Such a proposal would lead restrict housing choice massively. Conversely this proposal seems to assume that housing built outside major schemes (largely confined to main towns) and affordable housing products will not be accessible to local people. This assumption embodies the inequality in the South Hams housing market and results in a grossly inequitable housing market that displaces anyone who does not have the economic means to access housing anywhere other than the main towns.
1095108	326			Mr Richard Boyt	South Hams Planning	DEV8.1(i) – Redressing imbalance	<p>4.20-4.21 - Council fails to evidence how poorer people are being displaced by house prices. No reason why all parishes should have a balanced housing mix.</p> <p>4.24 - States 'DEV8 is clear that housing mix requirements may be adjusted by the LPA to correct existing imbalances in the housing stock of a given settlement or parish.' - but DEV8 is not clear. Council wants to reduce new bigger houses where there is a surplus. What if it was the other</p>	No change	4.20 - 4.21, the JLP prioritises equitable access to housing across the plan area, and as such the plan should be seeking to improve diversity of stock and accessibility to housing in all areas - neither the policy of the SPD aims to achieve the same housing mix in all areas. 4.24, redressing imbalances is not specific to any particular size or type, but the SHMNA is clear that newly forming households will continue to be smaller,

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							way around? 4.27 - Suggests that a local connection occupation can be sought to 'offset the negative impact of further skewing the housing mix'. If a big house is built it is built, a slight reduction in price due to a Devon covenant doesn't offset this.		so there is more of a bias towards smaller units. 4.27 local connection restrictions are proposed to be used in less sustainable locations, and as such will not apply to a large proportion of housing supply. Such restrictions will apply to dwellings of all sizes and types, and will make every dwelling more affordable by varying degrees.
1095108	337			Mr Richard Boyt	South Hams Planning	Development in the countryside (TTV26)	Criticism that the SPD only elaborates on housing proposals, and does not provide further guidance for other types of development.	Change to be made	Applications for different types of development will be considered against the full set of policies contained within the JLP, and not just TTV26. The response seems to infer that TTV26 is only relevant if the proposal site is considered as isolated. This is a misunderstanding of the policy, with only part one being applied to isolated locations. The SPD is not trying to introduce new policy - the first part of TTV26 makes it clear that the aim of the policy is to protect the countryside from inappropriate development. However, in combination with other representations, a review of TTV26 guidance will be undertaken to ensure clarity.
1095108	434	Mr Richard Boyt	South Hams Planning		Mike Derry and Joe Owen (Derry Owen Architects); Ed Brown (Cavanna Homes); Dan Lethbridge (ALA); Alex Perraton, Paul Myers and Adam Benns (BBH); Sam Williams (Mount Studio); Moxley Macdonald; Stephen Guard; Harrison Sutton Partnership; Coast Construction Ltd; Frogmore Homes Ltd; Bonaventure Homes Ltd; Luscombe Maye Ltd; Marchand Petit; Mike	General	Highly restricting occupation of new housing is likely to result in unviable developments. A lack of house building results in the undersupply of housing land, low construction confidence and missed housing targets. With no new working family or specialist housing coming forward in more remote rural areas, local residents are forced out by lack of supply and higher prices (similar to the effect evidenced recently in St Ives due to the principal residence restriction).	No change	Certain policy interventions may be applied to development proposals in rural locations. These are either in protected landscapes such as AONB and Undeveloped Coast or beyond the settlement pattern in tier 4 of the settlement hierarchy. The spatial strategy does not envisage a significant amount of housing to be delivered in tier 4, or in the undeveloped coast. As such, speculation about the potential impacts of using local connection clauses with regard to housing supply lacks credibility. Housing allocations beyond the strategic sites will still come forward via neighbourhood plans in tier 4 locations. The type of policy intervention being advocated will apply to a limited number of new homes, with the express intention of making these new homes more accessible to local people. This accords strongly with the JLP Vision, Policy SPT2.4 and SPT2.5, and Strategic Objective SO6.

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					Inness Architect				
1095108	321	Mr Richard Boyt	South Hams Planning		Mike Derry and Joe Owen (Derry Owen Architects); Ed Brown (Cavanna Homes); Dan Lethbridge (ALA); Alex Perraton, Paul Myers and Adam Benns (BBH); Sam Williams (Mount Studio); Moxley Macdonald; Stephen Guard; Harrison Sutton Partnership; Coast Construction Ltd; Frogmore Homes Ltd; Bonaventure Homes Ltd; Luscombe Maye Ltd; Marchand Petit; Mike Inness Architect	General	The SPD is too long and wide-ranging.	No change	Whilst the SPD is long, officers believe that it is easy to manoeuvre due to its structure and this will be explored further.
1095108	323	Mr Richard Boyt	South Hams Planning		Mike Derry and Joe Owen (Derry Owen Architects); Ed Brown (Cavanna Homes); Dan Lethbridge (ALA); Alex Perraton, Paul Myers and Adam Benns (BBH); Sam Williams (Mount Studio);	General	Advice is detailed in parts but silent in others resulting in an imbalance which will result in inconsistency in decisions. There is inconsistency between the SPD and JLP and inconsistencies amount to unlawful implementation of additional Plan policy.	No change	Officers do not believe that there is inconsistency between the SPD and the JLP. The SPD is a document do amplify and give guidance to the JLP policies and does not contradict it.

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					Moxley Macdonald; Stephen Guard; Harrison Sutton Partnership; Coast Construction Ltd; Frogmore Homes Ltd; Bonaventure Homes Ltd; Luscombe Maye Ltd; Marchand Petit; Mike Inness Architect				
1095108	324	Mr Richard Boyt	South Hams Planning	Mike Derry and Joe Owen (Derry Owen Architects); Ed Brown (Cavanna Homes); Dan Lethbridge (ALA); Alex Perraton, Paul Myers and Adam Benns (BBH); Sam Williams (Mount Studio); Moxley Macdonald; Stephen Guard; Harrison Sutton Partnership; Coast Construction Ltd; Frogmore Homes Ltd; Bonaventure Homes Ltd; Luscombe Maye Ltd; Marchand Petit; Mike		General	Councils don't have enough resource to manage the level of SPD expectation and will result in officers becoming overworked and making mistakes.	No change	Officers believe that adequate resources are available for decision making and the SPD will aid this process.

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					Inness Architect				
1095108	322	Mr Richard Boyt	South Hams Planning		Mike Derry and Joe Owen (Derry Owen Architects); Ed Brown (Cavanna Homes); Dan Lethbridge (ALA); Alex Perraton, Paul Myers and Adam Benns (BBH); Sam Williams (Mount Studio); Moxley Macdonald; Stephen Guard; Harrison Sutton Partnership; Coast Construction Ltd; Frogmore Homes Ltd; Bonaventure Homes Ltd; Luscombe Maye Ltd; Marchand Petit; Mike Inness Architect	General	Large elements of the SPD are misguided and guidance will have the exact opposite of the intended effect.	No change	Officers believe that the guidance in the SPD is useful and will be reviewed as and when needed.
1095108	335			Mr Richard Boyt	South Hams Planning	Managing flood risk and water quality impacts (DEV35)	Lack of reference to the Sequential Test. The Councils are not following national guidelines to prevent development in the active flood plain.	Change to be made	Additional paragraph to be added.
1095108	330			Mr Richard Boyt	South Hams Planning	Place shaping and the quality of the built environment (DEV20)	Suggests design section is too "old school" and difficult to use. Suggests reference to building lines is outdated.	No change	The format and content of this section has been developed with input from all JLP planning authorities. Disagree that it is difficult to use and that building lines is outdated.
1095108	336			Mr Richard Boyt	South Hams Planning	Prioritising growth through a hierarchy of settlements (TTVI)	Objects to the use of local connection restrictions within tiers 3 and 4 the settlement hierarchy.	No change	The JLP identifies all named sustainable settlements. The SPD cannot infer a status to AONB villages beyond what the JLP says. There are many factors that could have an effect on house prices going up, and the St Ives evidence is not of a sufficiently extended period of time to draw any robust conclusions. The proposed local connection requirements are not the same as a

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									Devon covenant. Housing that meets specific local needs is supported by para 77 of the NPPF.
1095108	331			Mr Richard Boyt	South Hams Planning	Specific provisions relating to transport (DEV29)	Indicative parking standards, but they appear stricter than indicative – anything lower or higher must be justified. Broadly support that approach.	No change	They are only indicative parking standards.
1095108	338			Mr Richard Boyt	South Hams Planning	TTV26.1 – Isolated development	Suggests revision of TTV26 section. However, the representation seems to be restricted to the conversion of barns in isolated locations, whereas both the JLP and NPPF refer to existing structures and brownfield sites.	Change to be made in part	Rephrasing of paragraph 11.49 for clarity and remove 11.51 as NPPF paragraph 79 makes clear provision for housing in isolated locations subject to meeting specific criteria. However, the SPD cannot narrow the scope of TTV26.1 (iii) or NPPF paragraph 79 with a view to enabling barn conversions.
1187545	211			Mrs Emma James	Okehampton Town Council	Affordable Housing (DEV7-DEV9) - Affordability of housing in the Plan Area	Both South Hams and West Devon suffer from a number of second homes/holiday rentals which cause issues for small villages and rural areas and local properties being sold as second homes/holiday lets should be stopped	Not applicable	The SPD cannot influence who buys/sells properties.
1187545	212			Mrs Emma James	Okehampton Town Council	Affordable Housing (DEV7-DEV9) - Affordability of housing in the Plan Area	The average salary means that most housing is unaffordable.	Noted	The SPD reflects the point being made here and the need to rebalance and deliver affordable housing.
1187545	207			Mrs Emma James	Okehampton Town Council	Community food growing and allotments (DEV5)	Only a small area of Level 3 land is suitable for food forests and at the moment it is being set aside for building houses. Recommends that the policy should insist land be set aside in each community for this purpose.	No change	The SPD has gone as far as it can go within the legislative framework. The SPD cannot designate land for a specific purpose.
1187545	217			Mrs Emma James	Okehampton Town Council	Delivering low carbon development (DEV32)	Lots of reference to guidance and documents, wants this set out as a simple guidance document and sent to all local government, parishes and towns to ensure everyone is working to the same guidelines.	Noted	No change proposed to SPD itself, but officers will be looking at the accessibility of the document and need for guides once the document has been adopted.
1187545	205			Mrs Emma James	Okehampton Town Council	DEV2.1 and DEV2.6 – Soil	Response suggests that agricultural land classification should restrict development outside the town to allocated sites only.	No change	Paragraph 3.37 addresses this with regard to considering the local significance of grade 3 land. The development strategy does not envisage large windfall development to occur beyond the edge of the town, but the SPD cannot create blanket restrictions on greenfield sites.
1187545	215			Mrs Emma James	Okehampton Town Council	DEV29.7 – Travel Plans	This section refers solely to highways. No mention of trains, specifically we would have hoped to see mention of the upgraded line and service from Okehampton to Exeter which will obviate the need for hundreds of cars travelling daily down the A30.	No change	Not necessary or appropriate to refer to trains or rail infrastructure here. Travel plans are a specific sustainable transport tool that can be used in the context of the planning process to secure investment and undertakings from a developer to achieve more sustainable travel to / from that development during its life. Travel plans can - depending on the specific circumstances of the development and the travel opportunities available locally, include measures to enable or incentivise travel by train. However, these are likely to take the form, for example, of vouchers for a number of free or discounted train journeys and the provision of train service timetables to new residents. The JLP authorities are very aware of the need for rail infrastructure improvements in the region to improve connectivity to the rest of the UK and to

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									improve opportunities to travel sustainably within the region. These improvements are being pursued by the Peninsula Rail Task Force and will be pursued by Peninsula Transport if / when that body is formally established as the Sub-National Transport Body for the area.
1187545	206			Mrs Emma James	Okehampton Town Council	DEV3 and DEV4 - Sports facilities and playing pitches	How can it be ensured that piecemeal development provides sufficient green space for pitches.	Noted	This would need to be considered in the initial stages of a development proposal in conjunction with the needs set out in the Playing Pitch Strategies and associated needs assessments.
1187545	209			Mrs Emma James	Okehampton Town Council	DEV8.1 – Overall housing mix	4.17 - What about bedrooms for visiting family? Carers for elderly or disabled persons? Mixed age children? Too narrowly defined.	No change	The SPD is clear that the SHMNA will not be applied prescriptively, with flexibility applied when using the data.
1187545	210			Mrs Emma James	Okehampton Town Council	DEV8.1 – Overall housing mix	4.18 - Too prescriptive and needs to be looked at again. 120 square meters is small for 6 people. Reject the assumption that 6 people can live in a three bedroomed house, not taking into account mixed age and gendered children. More people now need to have an elderly parent living with them and disabled people need a spare room for a carer to stay as Respite facilities have been cut by councils/ no longer funded.	Change to be made	Agree to remove para 4.18.
1187545	219			Mrs Emma James	Okehampton Town Council	Indicative character areas of Okehampton	Questions the accuracy of figure 15, and the identification of green space on the east of Okehampton.	No change	Figure 15 identifies the preferred character areas within the allocation. The open space identified is intended to be delivered between the different character areas within the allocated site. The 'hamlets' shown on the eastern side of the image refers to a character type within the allocated site.
1187545	216			Mrs Emma James	Okehampton Town Council	Meeting the community infrastructure needs of new homes (DEV30)	Okehampton Town Council stresses that paragraph 8.93 is amended to read new housing development 'must' make a contribution towards necessary improvements in community infrastructure rather than 'should'.	No change	Replacing the word 'should' with 'must' is not considered to be appropriate as this will depend on the size and scale of development proposed and other material considerations. Development proposals are considered on a case by case basis with regard for capacity/need issues.
1187545	213			Mrs Emma James	Okehampton Town Council	Protecting and enhancing biodiversity and geological conservation (DEV26)	Notes that Okehampton is part of the North Devon Biosphere and should be recognised in consideration of development	No change	The Biosphere is referenced in JLP Policy SPT12.
1187545	204			Mrs Emma James	Okehampton Town Council	Public Access Defibrillators	Supportive of PADs. All green spaces used for recreation should have a PAD in a central location. The wording 'Public Spaces' is only applicable to Plymouth	No change	The guidance refers to public spaces including greenspaces which is considered sufficient.
1187545	220			Mrs Emma James	Okehampton Town Council	Specific design details for Okehampton (TTV14)	Propose amendment to replace walking and cycling links with new rail connection.	No change	Support for investment in new rail infrastructure is contained within the JLP, and does not need to be included in this section of the SPD, which refers more to site specific and character area features.
1187545	202			Mrs Emma James	Okehampton Town Council	Sustainable Development and the Climate Emergency	In terms of travel there is no low carbon alternative for the majority eg. commuters from Okehampton have to drive as the train service is not in place.	Not applicable	This comment relates more to how the JLP is implemented rather than the specific guidance within the SPD.

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1190945	145			Mr Leslie Pengelly		DEV23.6 – Landscape and Visual Impact Assessment (LVIA)	DEV23.6 - 7.14 LVIA tables specify a setting distance of 500m. Where does this distance come from as 500m is very small. Whether an LVIA is required should be based on a landscape specialist or senior planning officers assessment of whether a development proposal could cause harm to a designated landscape.	Change to be made	Agree to make change to increase distance but to ensure an LVIA may still be required with judgement on a case by case basis.
1191045	271			Mr Simon Wagemakers	Persimmon Homes	DEV2.1 and DEV2.2 – Air	3.25 sets out a list of measures for all new development proposals to take into consideration which is not appropriate to be considered by every development proposal. Whilst it is appreciated that it is the intention of the LPAs that these measures are considered on an "as appropriate" however the current wording does not reflect this.	No change	It is not the intention that all of these mitigation measures should be put in place but all should be considered which is in the remit of the SPD.
1191045	272			Mr Simon Wagemakers	Persimmon Homes	DEV2.1 and DEV2.7 – Noise	Noise levels within buildings should be dealt with through building regulations not planning.	No change	Noise is a material planning consideration and reference has been made to relevant British Standards.
1191045	274			Mr Simon Wagemakers	Persimmon Homes	DEV26.5 – Biodiversity Net Gain	Advises that dealing with Biodiversity Net Gain should be deferred to national primary legislation.	Change to be made in part	10% was indicated as the likely direction of travel nationally within the Defra consultation feedback on the Biodiversity Metric and within the Environment Bill in 2019 (which has currently been withdrawn). Whilst it is anticipated that this will remain the national direction of travel, and that eventually 10% is likely to be mandated, wording to be amended to reflect current national standards. However the LPAs consider 10% is a reasonable demonstration of measurable Biodiversity Net Gain as referenced in paras 170, 174 and 175 of the NPPF, and is the level which the LPAs will consider a development to be policy compliant.
1191045	275			Mr Simon Wagemakers	Persimmon Homes	DEV29.2 - Parking dimensions	8.5 - parking bays sizes appear to reflect national guides however the garage sizes have been dramatically increased. The only explanation given for this is to allow for the incorporation of electric vehicle charging points in the future which isn't needed. It is suggested that external garages are required to be no larger than 3m x 6m with integral garages remaining as existing.	No change	The changes to the internal dimensions to garages are not just required to facilitate EV charging. It is accepted that garages perform an important function in providing extra storage space for new properties. By making garages larger they can still be used for the purposes of parking but also continue to perform a storage function (which also relates to cycle parking as well).
1191045	276			Mr Simon Wagemakers	Persimmon Homes	DEV29.3 – Parking provision: residential	8.7 - suggested parking is too high and contradicts other intentions contained within the JLP to improve public transport and limit private car usage.	No change	Car parking standards are indicative and higher/lower standards may be acceptable. It is not considered contradictory to the remainder of the JLP as officers are looking to reduce car usage for day-to-day trips primarily made on the transport network in the peak traffic hours and not car ownership - these are two very different things.
1191045	277			Mr Simon Wagemakers	Persimmon Homes	DEV29.4 – Parking provision: non-residential (EV charging points)	8.39 requires all new residential properties with a driveway or a garage are provided with an EV charging point. This is a significant additional requirement which is unnecessary as technology moves on. Should be amended to require that the ability to provide a charging point is integrated into relevant dwellings.	No change	Lack of readily available chargepoints has been one of the factors that has held back the growth of EV in the UK compared to some other countries. It is expected that levels of EV use will increase dramatically in the next decade, and the homes built during the Local Plan period will stand for many decades. Because of this, installation of EV charge points futureproofs them against the need to retrofit chargepoints, which is

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									much more expensive than installation at construction. There are risks of technological redundancy, but no more so than in other aspects of house building and the need to decarbonise mobility to address the climate crisis is so urgent that it is necessary and appropriate to make these demands of developers in terms of charging infrastructure.
1191045	273			Mr Simon Wagemakers	Persimmon Homes	DEV8.1(i) – Redressing imbalance	4.23 - housing needs may vary over time and in certain areas of the city. It is inappropriate to impose a single housing mix and this should be left to the market to determine the local need on a site by site basis. The alternative is to water down local character so that all areas of the city have the same types of housing which reduces the character of the city as a whole and reduces the variety of housing available to the market.	No change	Housing mix does not presuppose that there is only one way to build a house of a certain type or size. Comments also seem to refer to 'the city' despite this policy being applicable to TTV.
1191045	270			Mr Simon Wagemakers	Persimmon Homes	General	Document is too long with a lot of repetition of national advice and guidance and runs the risk that genuine advice is missed.	No change	Officers believe the links to external advice and guidance is helpful and whilst the document is long, officers believe the document is easy to search as it has been structured around the policies of the JLP.
1191222	293			Mr Graham Palmer		Affordable Housing (DEV7-DEV9) - Affordability of housing in the Plan Area	To what extent is new development driven by actual need, assessed within the local area(s), versus central government driven targets. Local knowledge is a much better judge of what is actually needed and what the 'mix' should be. What does affordable actually mean. In paragraph 4.71 the gap versus affordability and realise is made. How can the price gap be resolved?	Noted	The SPD reflects the point being made here and the need to rebalance and deliver affordable housing.
1191222	303			Mr Graham Palmer		Climate change, flooding, and coastal change (DEV32-DEV36)	Agrees with coverage of topic. However each aspect should be enforceable with penalties if not met. Recommends creating a mechanism to monitor progress of sustainability and reducing carbon emissions and making results public.	Noted	Noted and wider points to be considered further outside the scope of the SPD.
1191222	304			Mr Graham Palmer		Detailed provisions relating to the Thriving Towns and Villages Policy Area (TTV)	Comment proposes that para 11.5 is expanded upon to include other allocated sites in Tavistock.	No change	Para 11.5 was extracted from a previously adopted SPD that was focussed on the South West Tavistock, hence it is only applicable to the allocations within that part of the town.
1191222	290			Mr Graham Palmer		DEV1.1 – Impact of new development	3.5 mentions existing residents but how is this impact calibrated and how does this get factored in to an assessment? 3.6 – talks of 'High' Standard and 'High' Quality, this is subjective.	No change	Further clarity is offered in subsequent chapters
1191222	291			Mr Graham Palmer		DEV2.1 and DEV2.2 – Air	3.20 – impacts on air quality is subjective. Air quality should not be allowed to 'get worse'. Consideration should also be given to the wider impact of some developments.	No change	This section has to be considered in relation to other chapters about transport and sustainability of developments. The national guidance on Air Quality dictates as to what extent a Council can require and it would be unreasonable to prevent all development. The national guidance only talks about significant impacts, however government strategy is to minimise impacts by supporting the sustainable travel hierarchy i.e. pedestrians, cycling, public transport, private transport.

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1191222	297			Mr Graham Palmer		DEV26.5 – Biodiversity Net Gain	Queries ability to secure net gain from green field development, and concern that offsetting may be of no benefit to the location affected by the development. Queries how and who will police, manage and enforce delivery of offsite habitat creation and management.	Noted	The Defra metric attribute biodiversity values to habitats (e.g. in terms of distinctiveness, quality, connectivity), in simplistic terms a larger low quality and distinctive green field site could be partly developed with higher quality and distinctiveness habitat created on the undeveloped part, resulting in net gain for biodiversity. Onsite delivery is a preference, distance from site for offsite habitat is a consideration and the closer the better is the general approach. Management will be secured through legal agreements, including monitoring mechanisms. Ultimately the LPA will be able to enforce if habitat is not being managed in accordance with management plans.
1191222	299			Mr Graham Palmer		DEV29.4 – Parking provision: non-residential (EV charging points)	Developments about to commence or under construction should also deliver EV charging infrastructure.	Not applicable	This is out of the remit of the SPD and is not something the planning system can lawfully do. The LPAs cannot retrospectively make new, additional demands of a developer after this process has been concluded.
1191222	300			Mr Graham Palmer		DEV29.7 – Travel Plans	Support for travel plans. Can they be retrospectively applied to developments? With zero carbon emissions the target, Travel Plans should be mandatory for all but the most minor developments.	No change	Travel plans cannot be retrospectively demanded of developers once a development has received planning permission. Travel plans can, however, be developed and implemented with or without the support or involvement of the local authority on a voluntary basis - most often in the form of workplace travel plans or school travel plans.
1191222	301			Mr Graham Palmer		DEV29.9 – Strategic transport infrastructure	8.69 – agree but these must be agreed and formally contracted up front and the appropriate council bodies must have the power to enforce or if not delivered fine and/or stop development. Too many times developers have been allowed to agree on mitigation and then back off and eventually completely renege on what has been agreed.	Noted	Noted.
1191222	292			Mr Graham Palmer		DEV3.3 – Public rights of way and bridleways	3.94 – again considering the impact on existing residents – where no PROW exist, the impact of a new PROW and the ‘through (pedestrian) traffic’ that creates must be considered.	No change	The procedures by which new highway is created or an existing highway changed are set out in legislation which includes the requirements on public consultation.
1191222	294			Mr Graham Palmer		Economy (DEV14-DEV19)	Consideration must be given to where developments could take place versus whether there are sufficient jobs in the vicinity to support the numbers of people moving in to those new dwellings. Building the houses is one thing, but this should not lead to the majority of those people having to jump in their cars to get to the jobs.	No change	This issue would be considered as part of the planning balance when determining an application.
1191222	287			Mr Graham Palmer		General	Document is comprehensive, not only in terms of the myriad of planning aspects which are covered, but also the various ‘checks and balances’ to be applied. Questions whether the power will be available at the local level to ensure the developers adhere to the conditions set out in the SPD. Will there be the necessary man power and skills.	No change	Welcomes support. The purpose of the SPD isn't to influence national decision making or where the power of decision making lies.
1191222	288			Mr Graham Palmer		Introduction	Questions why the community can't be involved at pre-application stage. Building Regulations are behind what should be in place if truly serious about sustainable	Not applicable	The SPD cannot influence how the development management process works or influence building regulations which is separate.

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							developments and zero carbon emission targets. Developers should be forced to revisit their originally submitted plan to accommodate what is needed.		
1191222	302			Mr Graham Palmer		Meeting the community infrastructure needs of new homes (DEV30)	8.93 - it is considered that local councils must have the resource and the backing from central government to make commitments stick.	Noted	It is agreed that councils require resource and backing from central government in order to secure and deliver the infrastructure needs of new development.
1191222	295			Mr Graham Palmer		Place shaping and heritage (DEV20-DEV22)	What are special considerations for World Heritage sites? When are Design Review Panels used and what are is the status of their advice?	Change to be made in part	The SPD explains that Policy DEV22 protects nationally designated landscapes (including the World Heritage Site) from inappropriate development and activity. It provides the basis for thorough consideration of development proposals such that any permissions granted will be for development and activity that conserves and enhances designated landscapes. The SPD explains that The Cornwall and West Devon Mining Landscape World Heritage Site has its own Management Plan and supporting SPD which sets out how the planning system will fulfil its responsibilities to this designated heritage asset and contains a hyperlink to the document. Therefore, no change is considered necessary to the SPD in this regard. Clarification re. Design Review Panels to be added.
1191222	305			Mr Graham Palmer		Planning obligations, the Community Infrastructure Levy and development viability	Re. paragraph 8.93 it is considered that local councils must have the resource and the backing from central government to make commitments stick.	Noted	It is agreed that councils require resource and backing from central government in order to secure and deliver the infrastructure needs of new development.
1191222	296			Mr Graham Palmer		Protecting and enhancing biodiversity and geological conservation (DEV26)	Concern that developing green field sites is inconsistent with conservation, enhancement and restoration of biodiversity.	Noted	The JLP policy and SPD approach includes protection for protected habitats and species, whilst enabling calculation of existing biodiversity value of a site and securing biodiversity net gain.
1191222	289			Mr Graham Palmer		Sustainable Development and the Climate Emergency	Need to assess the cumulative impact of development on the environment and infrastructure	No change	This comment relates more to how the JLP is implemented rather than the specific guidance within the SPD. In addition, the cumulative impact of development in the JLP was taken into consideration in the SA/SEA and the HRA which supported the JLP.
1191222	298			Mr Graham Palmer		Trees, woodlands and hedgerows (DEV28)	Considers new planting rules should be stricter and any loss of trees and hedgerows fully compensated/mitigated. Also habitats must be fully evaluated even if they are to be removed to avoid harm to species occurring.	Noted	It is considered that the mitigation hierarchy for trees and replacement requirements if trees have to be lost is robust, as the planting requirements set out in the table relates to the stem diameter of any trees lost which will result in a net gain in canopy cover.
1232083	1			Cllr Matthew Chown		Sustainable Development and the Climate Emergency	Need to deliver 'zero-carbon homes and buildings immediately to meet 'carbon neutral' target.	No change	The SPD has gone as far as it can go within the legislative framework. It provides guidance to support the JLP policies which aim to deliver low and zero carbon homes. Delivery of these policies is a matter for development management processes and will be assessed on a case by case basis.

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1235665	10			Paul Vann	Plymouth City Council	Sport and recreation (DEV3) and Playing pitches (DEV4)	Grammatical corrections and suggestion of additional text regarding contributions towards new or improved water access	Change to be made	Officers agree changes are useful.
1236273	24			Mr Richard Allen	MACKPlan	Prioritising growth through a hierarchy of settlements (TTV1)	Concerns over how the term 'local' will be interpreted when delivering affordable housing.	Change to be made	The SPD does not seek to rewrite the local connection requirements used by RSLs of through the Devon Home Choice allocations policy. The local connection requirements contained within the SPD refer to open market housing, and not affordable housing - reference is made to Housing Needs Surveys, which only identified affordable housing need, and not the more general open market need. How and where local connection requirements are applied throughout the settlement hierarchy will be reviewed in connection with TTV1 and TTV25, so the issues raised will in this comment will be considered as part of that process.
1236671	20			Mrs Angel Braidwood	Sourton Parish Council	General	Very clear and gives clarity where it is needed, professional, thorough and look forward to the policies being implemented.	Noted	Support welcomed.
1236714	21			Ms Lucy Black	University of Plymouth	Purpose built student accommodation in the Plymouth Policy Area (DEV12)	Student welfare is of significant importance. PBSA should feel safe and worry free for student occupants. Serious concerns are raised about the likely impact shared uses could have on a student's welfare and performance, particularly where there is no segregation. As a consequence of mixing students with non-students in PBSA, demands for student housing could be created elsewhere in the system and this could lead to empty rooms. It is unlikely that suitable management plans can be put in place in dual use accommodation that protects the interests of students and such developments should not be permitted.	Change to be made	This information is helpful and draws our attention to the importance of student welfare. The LPAs recognise that students should be able to live in a safe and worry free environment and we wish to help ensure this can be achieved. The SPD will be amended to make it clear that student welfare will be a principle consideration during the planning process through management plans and we will continue to liaise with our Higher Education Institutes to address these matters.
1236900	353			Mrs Deborah Holloway	Pillar Land Securities LTD	DEV9.2 - Self and custom build housing	4.45 states these properties will need to be secured in perpetuity through a planning obligation. It is only right that a percentage of affordable self build plots are made available to eligible local people, however this can also be achieved by providing serviced plots at a 20% discount to market value. Also by restricting the plot sizes whilst still allowing for families to grow. If as suggested in the SPD a 30% discount should apply in perpetuity we believe this would seriously impact on the ability of purchasers to access affordable mortgages and would therefore also impact on a local authority's ability to meet their self build/custom build targets.	Change to be made	Change to be made to reflect the NPPF.
1236973	37			Mrs Julie Gilbert	Ivybridge Town Council	General	Suggests additional functionality to improve manoeuvring around the document.	Noted	Whilst not a comment on the SPD content, officers will consider ways of improving manoeuvrability of the document when adopted.
1236973	35			Mrs Julie Gilbert	Ivybridge Town Council	Meeting the community infrastructure needs of new homes (DEV30)	Important to take into account the financial pressures placed on adjoining parishes when the infrastructure demands falls within that neighbouring parish, and not the parish where the development is located. New housing development should make more contribution towards the parish bearing the pressures of the additional demand on their community infrastructure.	No change	The potential impacts of a development on local infrastructure are considered by the relevant authority. In the case of Ivybridge, DCC would consider the impact on all local infrastructure such as schools, roads and libraries etc.

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1237014	23			Halliday Totnes Town Council	Totnes Town Council	General	Too long and inaccessible. Suggest the document is split into separate documents. Doesn't acknowledge the impact of large development on the Air Quality Action Plan area in Totnes.	No change	When designing the SPD at the project stage it was decided that, rather than creating separate documents and SPDs, one document covering guidance for each policy would be more useful to the end user. The document has been designed to be easily searched so readers can find the guidance for each policy quickly. The document has also been designed in a way that it can be updated quickly if there is a change in guidance/policy. Guidance re. air quality is available at DEV2.1-DEV2.2.
1237235	28			Mr Peter Sandover		DEV2.1 and DEV2.4 – Light	Wants reference to the South Devon AONB guidance in the SPD.	No change	The South Devon AONB guidance is already referenced at DEV25.8.
1237235	29			Mr Peter Sandover		DEV27.2 – Open spaces, including designated City Green Space and Neighbourhood Green Space	The definition of Neighbourhood Greenspace is likely to confuse communities. The NPPF clearly defines Local Green Space which communities are empowered by within Neighbourhood Plans to designate. Uncertainty on level of protection and designation of NGS. Clarity needed on this section and recommends including the relationship between Strategic Green Space, NGS and LGS in the text.	No change	Policy DEV27 of the JLP sets out the green space hierarchy whilst the evidence base for the JLP includes a document setting out why spaces were designated and what each designation means. This is already referred to in the guidance.
1237235	31			Mr Peter Sandover		General	Unhappy with the length and dates of the consultation period.	No change	The consultation process followed is in line with national guidance and the current Statement of Community Involvement.
1237235	30			Mr Peter Sandover		Protecting local shops and services (DEV18)	Supportive of the principle of supporting local shops and services however the boundary in Kingsbridge should be extended.	No change	Primary Shopping Boundary are defined on the adopted proposals map which forms part of the JLP and as such cannot be amended through the SPD.
1237449	32			Cllr Doug Packer	Wembury Parish Councillor	Prioritising growth through a hierarchy of settlements (TTV1)	Proposed amendment. Replace 'may' to 'will' in relation to restrictions on permissions in UC policy area.	Change to be made	Agree that the wording could be strengthened in para 11.17.
1237463	33	Mr John Brindley			Sherford New Community Consultation	DEV8.1 – Overall housing mix	4.18 - the requirement to control the mix of housing via the NDSS is contrary to the guidance on NDSS. Mix should have been part of the policy which was tested through the examination of the JLP.	No change	Housing mix was considered during the JLP examination, in particular use of SHMNA data. NDSS being used in this way was not considered during the examination.
1237533	96			Mr Tom Clarke MRTPI	Theatres Trust	DEV18.6 – Community facilities	Supportive of guidance for DEV18.6. Suggest strengthening the wording though and making it more robust. Suggest revised wording. Support paragraph 5.60.	Change to be made	Officers agree that the amendment will provide useful clarity and flexibility.
1237548	114			Ms Kristina Sodomkova		Trees, woodlands and hedgerows (DEV28)	A range of suggested changes have been made relating to street trees; establishment and maintenance; cross referencing to other sections of the document to avoid reinforcing traditional silos; amenity assessment; addition of a reference to Arb Association directory; compliance and states more references to the benefits of trees should be made. It is suggested that the structure of the whole SPD needs reviewing.	Change to be made in part	The title reflects the Policy DEV28 which has been adopted and cannot be changed. There is no need therefore to add street trees to the title as they would be considered as trees under the Policy DEV28. The SPD provides additional guidance to developers on what is expected to comply with DEV28, it is not guidance for street trees which come under the control of PCC. 7.147 The wider benefits of trees and links to other disciplines has been considered in more detail within the adopted Plan for Trees and the Joint Local Plan to which this SPD directly relates. It is not therefore appropriate to add this to the SPD. Cross referencing to other relevant policies took place in the Joint Local Plan.

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									<p>7.147 Health benefits are mentioned in the first paragraph as is their visual contribution. Establishment and maintenance of new trees is acknowledged as essential and would be dealt with under appropriate landscaping conditions. Detailed amenity assessment methodologies such as CAVAT and management of Council trees including street trees will be dealt with in a separate document Principles of Tree Management which is being delivered as part of the Plan for Trees Delivery Programme with various partners. If street trees are impacted by a development eg: to create an access or hardstanding there will be a requirement to replace as detailed in the SPD.</p> <p>7.153 this statement is not 'irrelevant' and should not be removed, all tree works should be carried out in accordance with the relevant British Standard. Reference to the ARB directory to be added.</p> <p>7.175 do not see the need to change this.</p> <p>7.179 - paragraph 7.180 sets out the enforcement measures that can be taken if conditions are not complied with.</p> <p>7.189 Plan for Trees is referenced here as it deals with tree planting specifically.</p>
1237549	144			Mr Simon Earland	Transition Tavistock	APPENDIX 3: Shop fronts, including ATMs	Suggest the inclusion of requirements regarding free standing advertising material on pavements and outside shops.	No change	A-boards require consent from the landowner and advertisement consent and so the design of A-boards is dealt with on a case-by-case basis.
1237549	125			Mr Simon Earland	Transition Tavistock	Community food growing and allotments (DEV5)	Support aims of DEV5.	Noted	Support welcomed.
1237549	126			Mr Simon Earland	Transition Tavistock	Community food growing and allotments (DEV5)	3.99 - The 1 km radius test is insufficient – it should be 1 km by a practical route.	No change	Officers believe the 1km radius test is sufficient, to work out for each allotment site, various practical routes would be unworkable. Officers apply a similar approach to play areas and green space, which were tested and accepted at the JLP hearings.
1237549	121			Mr Simon Earland	Transition Tavistock	DEV1.2 – Accessibility	<p>The LPA's "duty" to accessibility is translated into a weaker "good practice guidance should be considered" without saying how it will be checked.</p> <p>The second reference document is only available to purchase at a cost of £206 for non BSI members, hindering the public in checking adherence.</p>		<p>The Equalities Act is the overarching legislation/framework for design and gives legal protection from discrimination, this includes The Equality Act 2010 and the Equality Act 2010 (Disability) Regulations 2010. There is also The Workplace (Health, Safety and Welfare) Regulations 1992 which suggests design details for buildings of work such as in officers.</p> <p>Whilst the SPD is referring to British Standards, this is the main accessibility document and many other documents are derived from that, such as the Building Bulletin, best practice design guides, changing places etc. some are available for free and some you need to subscribe to as with most guidance. However, a change will be made to the SPD to make this clearer and also to add cross-reference to other sections in the SPD where accessibility will need to be considered.</p>

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1237549	129			Mr Simon Earland	Transition Tavistock	DEV10.1 – ‘Sense of place’ considerations	Supports 4.121 call for care to be taken in connecting new development to existing communities and facilities. Suggests link to Transport section.	No change	Support welcomed. Inclusion of link to transport section not considered necessary.
1237549	130			Mr Simon Earland	Transition Tavistock	DEV10.5 – Space standards and outdoor amenity space	4.136 to 4.139 - endorse the importance of outdoor amenity space beside dwellings.	Noted	Support welcomed.
1237549	131			Mr Simon Earland	Transition Tavistock	DEV15.5 – Garden centres and farm shops	5.18 - We support provision to ensure farm shops supply mainly local produce.	Noted	Support welcomed.
1237549	132			Mr Simon Earland	Transition Tavistock	DEV16.1 – Retail spatial strategy	Support the approach to retail and other town centre uses	Noted	Support welcomed.
1237549	123			Mr Simon Earland	Transition Tavistock	DEV2 - Street cafes	Support for paras 3.62 to 3.65	Noted	Support welcomed.
1237549	122			Mr Simon Earland	Transition Tavistock	DEV2.1 and DEV2.2 – Air	3.25 - Strengthen “consideration” – the developer should make a detailed, public response and justify why any points from this list are not addressed.	No change	Officers do not believe that this wording needs to be strengthened, there are many ways in which a development could mitigate against negative impacts on air quality.
1237549	139			Mr Simon Earland	Transition Tavistock	DEV29.4 – Parking provision: non-residential (EV charging points)	Suggests a number of amendments and additions to the text relating to the provision of EV charging infrastructure.	Change to be made	<p>Officers do not believe it is necessary to change 'should' to anything stronger and to explicitly include reference to specific building purposes. Table 33 sets out minimum required provision and the purpose of the table is to make a distinction between residential developments.</p> <p>Row 4 of Table 33 does specify that provision include some rapid charge points (50kW+) and we do not believe it needs to be amended. As the respondent notes, this is a fast changing scene, so we are keen to avoid being too prescriptive and being out of date within a short period. Also, destination developments are increasingly seeing the provision of EV charge point infrastructure as part of their wider customer offer, a potential competitive advantage and a new revenue stream.</p> <p>Not appropriate to include text providing for future growth in the ratio of charge points to parking spaces, as any 'futureproofing' of a development needs to be explicit and needs to be planned for and delivered as part of the development at the time that the application is made and considered. Also providing charge point ready cabling for 50 % of spaces at other resi developments and for staff parking at workplaces will make delivery of additional chargepoints in the future as cheap and easy as possible. In practical terms (given the 25% minimum provision figure) the minimum number of parking spaces at a high turnover development would be 4, though it is extremely unlikely that a supermarket, leisure facility or similar will come forward proposing that few parking spaces. Agree that location of sufficient quantity of charge points close to the entrance to the facility is key. Communities that develop a Neighbourhood Plan</p>

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									could seek to address the level of EV infrastructure in their area. Many factors will influence the amount and distribution of EV infrastructure in the coming years. This SPD and indeed the spatial planning and development management process can only seek to influence the provision of EV infrastructure provided in the context of new development and changes to land use. Given the need to respond the climate emergency by enabling rapid decarbonisation of transport, we are seeking to ensure that development contributes proactively to this by delivering - among other things - ample EV charging infrastructure.
1237549	138			Mr Simon Earland	Transition Tavistock	DEV29.5 – Other parking facilities	<p>Comments and suggested amendments regarding EV charging infrastructure, including with regards to: cross-referencing; consistency of terminology; monitoring of overall EV chargepoint provision; division of responsibilities for EV infrastructure; thresholds; three phase power supply, and securing EV infrastructure through S106 agreements. DEV 29.5 Should be separated into one policy for cycle parking, another for charging points. "Charging point" should be consistently named. Suggest cross-reference from residential and non-residential parking sections to EV charging section</p> <p>Paragraph 8.41 The threshold of 200 homes for requirement of charging provision is too high, especially given opportunity to split developments. Para 8.45 suggests the re-charge cost is just for supply, without responsibility for ongoing maintenance or 24 hour telephone support for technical problems. LPAs could not enforce the provision after the development is complete. While recognising it is not within the scope of this document, we point this out as a potential issue for future consumer protection, as management companies controlling re-charges on communal estate chargepoints could become exploitative Para 8.47 Yes – but this should help raise level of S106 overall, not divert from other infrastructure.</p>	Change to be made	<p>Cross-referencing and consistency in terminology re. charge points to be changed. Monitoring of EV charge point provision is not within the remit of the SPD. The division of responsibilities for maintenance and operation will vary from development to development, according to the circumstances of the development and in the absence of a comprehensive regulatory regime for EV infrastructure and service provision. Support welcomed re. the requirement to provide a three phase electricity supply to all occupied buildings. The amount of money secured through S106 agreements and the infrastructure they deliver are specific to each development, and considered in the context of development impacts and development viability, and need to balance a range of community needs. It is not possible for the SPD to be prescribe that EV chargepoint infrastructure not be considered or counted as part of the overall transport S106 provision.</p>
1237549	137			Mr Simon Earland	Transition Tavistock	DEV29.5 – Other parking facilities (Cycle parking)	<p>Welcome the inclusion of standards on cycle parking, and the headline requirements of 8.30 and 8.31, but section would benefit from editing to improve the logical flow and clarity.</p> <p>8.31 - wants the paragraph strengthened. The "all uses" in Table 32 is not very clear. Support an "if greater" test related to staff numbers.</p> <p>8.32 - agree, noting that e-bikes are heavier than standard ones and also more likely to be used by older people, so inclusive design of stands matters.</p> <p>8.33 We could not work out what this means. What is the relevance of lifts for ground floor flats?</p> <p>8.37 We support the point about location. Are numbers of cycle parking spaces covered within Table 32, which is unclear whether it is about staff or customers? Can something be added about suitable provision at certain types of building (e.g. supermarkets and schools) for cycles with</p>	Change to be made	<p>Paragraph 8.30 and 8.31 have been amalgamated and strengthened to state that any deviation from the criteria/standards must be explicitly justified. Amendment to be made to paragraph 8.33 to provide clarity and error in Table 32 to be corrected. Table 32 covers both staff and visitors. Reference to be added to London Design guidance re. cycling provision at certain buildings. Planning for overall levels of cycle parking in key locations is referenced within the JLP.</p>

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							trailers to be locked? These provisions focus on individual developments. In addition, there is benefit in planning for cycle parking overall in key places, e.g. town or village centres. Cyclists may prefer to park in a secure place then walk around, rather than relock a cycle at each shop or attraction. Such provision could be developed through the Neighbourhood Plan, and once in place, could allow more flexibility in the provision required for specific non-residential buildings.		
1237549	140			Mr Simon Earland	Transition Tavistock	DEV29.7 – Travel Plans	<p>8.54 Needs strengthening. NPPG guidance is 2014 so not motivated by current level of appreciation of climate emergency. Change to “will be required for all developments of more than 10 dwellings” (and a stated min size of non-residential), though some points of the travel plan could then be discretionary for smaller developments.</p> <p>8.62 - concerned that the SH and WD definition of a travel plan is much weaker than that for Plymouth.</p> <p>8.60 – 8.63 DCC should charge for travel plan approval if that helps build capacity to get more travel plans done. This could be done in partnership with the voluntary sector to bring in local knowledge.</p> <p>8.64 We think that in WD, the first 2 bullet points would “normally” apply, not “in some cases”. The 3rd point should be done at start of planning. We would welcome funded travel co-ordinator time coming from significant developments, but suggest that this could be most productive as a contribution to wider community efforts to help people change travel patterns rather than a short burst for residents of the specific new homes.</p>	No change	<p>Para 8.54 in the SPD will be complimented by a Travel Plan Guide for Developments in Plymouth which will be made available. In addition a short summary of this guidance will also be available as part of the Plymouth City Council 2020 Validation List which we expect to published shortly.</p> <p>TTV content reflects the input from DCC and contains necessary flexibility in terms of when travel plans are required and the scope of the travel plans. The current text allows officers to consider the issues on a case-by-case basis.</p>
1237549	141			Mr Simon Earland	Transition Tavistock	DEV29.8 – Permeability	<p>8.65 to 8.68 is technical and needs to be explained in everyday language. Hope that the reference to a site wide accessibility audit is intended for all developments, not just those having travel plans. It needs to be done at an early stage to ensure gaps for access are left available.</p> <p>8.67 Is this the definition of an Accessibility Audit? The wording is confusing. Right ideas, but woolly and does not have logical flow. Which routes? Is this walking / cycling as in 8.65? Bullets are wider in meaning and should be earlier in document.</p>		<p>Wording amended to improve clarity.</p> <p>The need for a site-wide Accessibility Audit will be determined by the scale and nature of the development. An Accessibility Audit would look at the use of all modes of transport to get to and from a development. Such an Audit would usually be taken up-front but could be covered by condition.</p>
1237549	142			Mr Simon Earland	Transition Tavistock	DEV29.9 – Strategic transport infrastructure	8.71 It is not clear what this means, apart from the “may be” contributions?	Change to be made	Change to be made to improve clarity.
1237549	143			Mr Simon Earland	Transition Tavistock	DEV29.9 – Strategic transport infrastructure	<p>8.75 We think that the accommodation of buses within a new development should be considered for any development not within a specified distance (e.g. 0.5 mile) from a current bus route.</p> <p>8.78 We agree – and we also think that the audits should be made public in time to influence the decision on planning permission. Lack of a LCWIP should not be an excuse for not carrying out an audit. Also, any application to revise plans must explicitly say whether it would affect the audit findings. Post completion – should lead to enforcement if</p>	No change	<p>The accommodation of buses within a new development should be considered for all developments, irrespective of their proximity to current bus routes on the basis that:</p> <p>(1) if buses are not considered from the outset, and developments designed accordingly, it’s highly likely a service wouldn’t be able to retrospectively be fitted into the development even if desired</p> <p>(2) bus routes change and hence even if a development is close to a bus route when it’s planned this may</p>

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							needed. 8.79 We agree. We appreciate the way this document has links to national guidance, which members of the public might not otherwise be aware of. 8.81 We support this speed limit.		change in the future (3) the JLP sets out standards for walking distance to nearest bus stop across the Plan Area and, where this criteria is not met, consideration should be given to introducing new services.
1237549	124			Mr Simon Earland	Transition Tavistock	DEV3.3 – Public rights of way and bridleways	We support this policy.	Noted	Support welcomed.
1237549	127			Mr Simon Earland	Transition Tavistock	DEV8.1 – Overall housing mix	We agree there is an imbalance to be addressed (4.15, 4.21) and measures taken should not discourage home working (4.17).	Noted	Comments noted.
1237549	128			Mr Simon Earland	Transition Tavistock	DEV9.2 - Self and custom build housing	4.43 Welcome the intention to encourage community-led self/custom build housing development as a way to meet specific housing needs identified by the community.	Noted	Support welcomed.
1237549	119			Mr Simon Earland	Transition Tavistock	General	Asks for documents to be referenced with date and where to view documents which need to be paid for.	No change	Links to where the documents can be purchased are incorporated into the document which includes details on dates and how to buy/view them.
1237549	135			Mr Simon Earland	Transition Tavistock	Natural environment (DEV23-DEV28)	Strongly supports the opening comment. Recommends cross referencing both ways to section three in view of proven mental and physical health benefits of access to nature.	Noted	Support welcomed, although additional cross-reference is deemed unnecessary.
1237549	134			Mr Simon Earland	Transition Tavistock	Promoting competitive town centres (DEV17)	Endorse 5.47, but the policy appears thin, and the link to a 2017 consultancy report, while interesting, does not clarify future intentions.	No change	There is no more definitive guidance available at this time. In addition it is likely that national guidance will be issued. It would be premature for the JLP Councils to seek to anticipate what this will require.
1237549	136			Mr Simon Earland	Transition Tavistock	Specific provisions relating to transport (DEV29)	8.4 - We endorse the importance of this objective.	Noted	Support welcomed.
1237549	120			Mr Simon Earland	Transition Tavistock	Sustainable Development and the Climate Emergency	Welcomes the declarations of Climate Emergency and Biodiversity Emergency. Welcomes the intention of the JLP to establish how low carbon policies and sustainable development strategy will be implemented.	Noted	Support welcomed.
1237552	116			Mr Jon Elwell	Elwell Estates	Housing (DEV7-DEV13)	Restrictions to the size of extensions and replacement buildings cannot be defined in percentage terms related to the size of the original building. Extensions should be considered on merit taking account of the available space, not restricted by a maximum 50% uplift. Provision of self build plots should be encouraged in all areas.	Change to be made	The approach to TTV29 has been reviewed and changes made that do not rely on prescriptive percentage thresholds.
1237557	146			Dr Sarah Collinson	Inclusive Totnes	DEV1.3 – Health Impact Assessments	The document does not address clearly or directly enough the potential for housing developments to have a negative impact on the health of community and to have health inequality impacts due to resulting increase in traffic, congestion and air pollution in the local area in the specification of requirements for conducting Health Impact Assessments. Want more detail on how traffic, congestion and air pollution impacts of volume housing developments will be calculated and mitigated against, with particular attention to impacts on the young and the elderly. Want a commitment to no volume housing developments which will intensify	Change to be made in part	Where after mitigation proposed a development is still assessed as having a significant impact on air quality in accordance with relevant technical guidance, this would go against our core policy and as such the development would not be supported. However developments may individually be acceptable but cumulatively create a significant impact, as such there is a need that all developments which create additional traffic should consider their impacts and how to minimise/mitigate these. Text amended to refer to national guidance as a benchmark to assess costs of damage caused by

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							traffic, congestion and air pollution problems in any declared Air Quality Management Areas.		emissions. Guidance is included on air quality within DEV2.
1237557	147			Dr Sarah Collinson	Inclusive Totnes	General	Unhappy with the consultation, particularly engagement with hard-to-reach groups. Also want to see clear references to the Councils' public sector equality duty at every appropriate point in the SPD and clear statements of how future decision-making based on the JLP and SPD will ensure that they meet their public sector equality duty. Want an unambiguous acknowledgement of new evidence on the negative impacts of air pollution on vulnerable people with protected characteristics, in particular children, the elderly and people with long-term heart and respiratory conditions. Want to see a clear commitment added to specify that the Councils will gather and use evidence on actual and potential air pollution impacts of planning strategies and decisions, including reference to Air Quality Management Areas, Air Quality Management Plans and clean air strategies.	No change	The consultation process followed is in line with national guidance and the current Statement of Community Involvement. How officers will consider air quality is available at DEV2.1 and DEV2.2.
1237558	153			Mr Joshua Gardner		Affordable Housing (DEV7-DEV9) - Affordable Housing tenure mix	Local Authorities need a self build list that is acceptable as currently it is not accessible as anyone can join multiple lists.	Not applicable	The rules for registering on self build registers are set at a national level and not locally though planning policy and guidance.
1237558	154			Mr Joshua Gardner		Affordable Housing (DEV7-DEV9) - Delivery and future control in the Plan Area	To build affordable housing through contributions you need to have sites to put this investment into and extra support needs to be given to land owners, and parish and town councillors to push ahead with affordable housing by having an officer in place to support such progression rather than the council trying to volunteer there time to do this.	Not applicable	This comment related to resource issues within the LPAs rather than the SPD itself.
1237558	156			Mr Joshua Gardner		APPENDIX I: Residential extensions and alterations	People do not have a right to light	No change	Impacts on light are a material planning consideration and therefore this subject can be covered in the SPD although officers do accept that "Right to Light" is separate civil legislation.
1237558	148			Mr Joshua Gardner		DEV1.1 – Impact of new development	The SPD document will limit good design, Slow down development meaning housing need will take longer to pull off, custom housing/ affordable housing will be limited in design and in particular may cost more to meet these requirements. Limits high quality housing not promotes it.	No change	Officers disagree – the document promotes good quality design and place-making, including with housing, consistent with JLP Policies. It does this in a way that is not prescriptive and has appropriate flexibility.
1237558	159			Mr Joshua Gardner		DEV26.5 – Biodiversity Net Gain	Support for requirement for bird boxes and hedgehog highways, requests inclusion of bee bricks. Notes importance of enforcing/monitoring this actually happens.	Noted	Support welcomed. Bee bricks are already referenced in 7.102.
1237558	150			Mr Joshua Gardner		DEV3.2 - Water and waterside access	Water access and recreation should be allowed as a s106 contribution.	Change to be made	Change to be made to include reference to possible s106 contributions.
1237558	158			Mr Joshua Gardner		General	More staff will be needed to implement such proposals and to enforce the obligations on the individuals. Not clear who the document will be aimed at. Allows the lay person to give planning a go which will slow the process down. The document is too simplistic in places.	No change	The introduction states that the SPD is intended to be used by all members of the community, as well as those directly involved in the development industry. Planning is a process open to all and so anyone with an interest is allowed to participate.
1237558	151			Mr Joshua Gardner		Meeting local housing need in the Plymouth Policy Area (DEV7)	Section is contradictory on what it is trying to achieve. Will make planning and design harder and more complicated for all. Not clear what this document is trying to achieve.	No change	A Supplementary Planning Document is an established tool to amplify and give guidance on the implementation of the policies in a local plan and is

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							Already have NPPF PPG and JLP without adding the DEV SPD.		there to provide clarity to those engaging with the planning system as to how planning decisions are made.
1237558	152			Mr Joshua Gardner		Meeting local housing need in the Thriving Towns and Villages Policy Area (DEV8)	Garden developments in some cases is the only way to get children on to the housing ladder in rural areas meaning the mix and need wont be met with these new policies and the current ones are fine.	No change	There is no scope for cherry-picking which old policies can be saved - the new policies form part of a coherent spatial strategy that was tested at EiP.
1237558	157			Mr Joshua Gardner		Planning obligations, the Community Infrastructure Levy and development viability	This comment relates to 'development bonds' stating that the amounts need to be increased and that the councils need to assist in this as development costs are increasing and in can cost more to rectify things at a later date. It is stated that it should not be up to buyers, the councils or utilities to pick up the pieces.	Noted	It's not clear what's meant by 'development bonds' but it is assumed this refers to S106 planning obligations and developer contributions. It is recognised that sufficient contributions from development will be required if the infrastructure required to mitigate impacts is to be provided.
1237558	155			Mr Joshua Gardner		Provisions for local employment and skills (DEV19)	Concern re. lack of clarity	Change to be made	Change to be made to make it clear that these are Construction Industry Employment and Skills Plans (ESP).
1237558	149			Mr Joshua Gardner		Public Access Defibrillators	Supportive of PADs, concerned about continued maintenance and enforcement.	No change	The guidance recommends a condition which could require continued maintenance in line with the South West Ambulance Service requirements for registration (as per paragraph 3.17). This includes monthly online checks sent to SWAST which could be checked if nessessary.
1237672	179			Mr Alex Perraton	BBH Chartered Architects Ltd	General	Suggest that it would have been more expedient if the main agents for the area were involved in the process at an earlier stage. Important that comments raised during the consultation are digested, understood and responded to in a legal manner. Needs to be another round of consultation. Believe the SPD is rushed, too specific in certain areas and lacking detail in others leaving loopholes. Narrow in its manner of trying to address specific issues.	Noted	Due to the amount of comments and complexity of the responses, the adoption of the SPD has been delayed by several months so officers have time to thoroughly consider and respond to the matters raised.
1237693	178	Mr Simon Mitchell		Mr Simon Mitchell	Churchill Retirement Living Ltd	Affordable Housing (DEV7-DEV9) - Affordable housing thresholds in the Plan Area	Whilst sheltered housing and other housing for older persons can be considered within the C3 use class, 'extra care' is usually considered to be within use class C2 and not subject to the council's affordable housing thresholds.	Change to be made	When determining whether proposals fall into the C2 (Residential institutions) or C3 (dwelling houses) classes, consideration will be given to "the level of care and scale of communal facilities provided". Amendment to SPD to be made to clarify this position.
1237693	182	Mr Simon Mitchell		Mr Simon Mitchell	Churchill Retirement Living Ltd	Affordable Housing (DEV7-DEV9) - Affordable housing thresholds in the Plan Area	Affordable housing thresholds within the PPA and TTV of 30 per cent is calculated against the "total number of dwellings" in a development. This is not necessarily an equitable way of assessing the requirement for affordable housing as it does not explicitly take into account the requirement on schemes that have a mix of types and sizes of accommodation. It would be more equitable to assess the threshold against the number of bedspaces. Furthermore, it should be made clear that there are exceptional circumstances where affordable housing cannot be achieved on site.	No change	The JLP states the affordable housing thresholds and cannot be amended by the SPD.
1237693	188	Mr Simon Mitchell		Mr Simon Mitchell	Churchill Retirement Living Ltd	Affordable Housing (DEV7-DEV9) - Affordable housing thresholds in the Plan Area	The requirement relating to C2 housing (paragraph 4.73) is not reflective of recent appeal decisions relating to this matter (Appeal Ref: APP/U1105/W/17/3177340). The decision as to whether an application for older persons housing is C2 or C3 is a matter to be decided based on the specifics of each scheme and on a case by case basis. The level of care required to warrant a C2 or C3 designation	Change to be made	When determining whether proposals fall into the C2 (Residential institutions) or C3 (dwelling houses) classes, consideration will be given to "the level of care and scale of communal facilities provided" Amendment to SPD to be made to clarify this position.

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							and therefore a requirement for affordable housing provision is likely to be different for all residents. Not all people will require the same level of care at the same point in their life, but what is important is that care is available to meet their individual needs as and when the time comes.		
1237693	185	Mr Simon Mitchell		Mr Simon Mitchell	Churchill Retirement Living Ltd	Affordable Housing (DEV7-DEV9) - Affordable housing, service charges and other estate management charges in the Plan Area	It would unfairly discriminate against the private provision of housing for older persons if service charges were restricted to the levels quoted in paragraph 9.2 and the SPD should acknowledge that there are instances, particularly where older persons housing is being provided, where on site affordable housing is not achievable.	Change to be made	The purpose of the service charge cap is to ensure that the total housing cost of affordable units remains affordable. Therefore the SPD flags this issue in advance to ensure this issue receives careful scrutiny in advance. Service charges will be affected by the nature of communal facilities proposed. In exceptional circumstances alternative service charge levels can be agreed - subject to robust justification and scrutiny of impact on the total housing cost in each case. It is agreed however that Extra Care scheme for older people as well as some other forms of supported housing will very likely exceed the service charge caps outlined and therefore additional wording has been included to reflect this.
1237693	186	Mr Simon Mitchell		Mr Simon Mitchell	Churchill Retirement Living Ltd	Affordable Housing (DEV7-DEV9) - Off-site provision and commuted sums in the Plan Area	<p>4.113 It is inequitable that 50% of off site contributions should be made on commencement of development. It is common practice for contributions to be made following at least 50% of sales.</p> <p>Table 10 – The proposed method for calculating the commuted sum should be based upon the equivalent developer subsidy that would have been provided had the affordable housing been provided on site. This ensures that the developer is neither advantaged or penalised for providing a commuted sum. The formula does not take into account values and costs and therefore does not reflect the developer subsidy position. The developer subsidy should be based on the difference between the residual land value of the scheme with zero affordable housing and the same scheme with the policy target amount of affordable housing (in this case 30%). This method ensures that the commuted sum fairly and reasonably reflects the particular costs and values associated with the development scheme that is being considered. This also allows off site contributions to reflect Tests two and three of the planning obligation tests in paragraph 12.25 of the SPD. The developer subsidy position enables the contribution to be directly related to the development (Test Two) and fairly and reasonably related in scale and kind to the development (Test Three).</p> <p>4.114 and 4.115 As the commuted sum will use the average affordable housing price it would be helpful for the respective local authorities to make transfer prices publically available and updated on a regular basis (monthly or quarterly).</p>	No change	Earlier trigger for payment of an off site sum (as compared to on site delivery) is predicated on the additional time required to enable delivery of affordable housing off site in a timely manner. This is common practice and considered to be reasonable, particularly when considering the additional work it could take to find alternative affordable housing sites and arrange everything to enable delivery. Re. viability reporting, the SPD sets out a simplified methodology to be calculated which directly relates to each specific scheme and is considered to be fairly and reasonably related to affordable housing provision - making a comparison between on site and off site affordable housing delivery costs.
1237693	187	Mr Simon Mitchell		Mr Simon Mitchell	Churchill Retirement Living Ltd	DELI.5 – Development viability	Paragraph 12.1.5 is not compliant with the NPPG: "12.1.5 If during the course of determining a planning application it becomes apparent that viability is a material consideration it	No change	Where a viability assessment accompanies a planning application it is anticipated that it will be resolved within the 13 week timeframe. The SPD entry only

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							is expected that an extension of time will be required in order to review the viability position."		applies where viability is raised and new information is submitted during the 13 week determination period.
1237803	429			Ms Jeanne Alayli	South Hams Society	DEV8.1 – Overall housing mix	Support the proposed measure to restrict dwelling sizes in relation to the numbers of bedrooms they have.	Noted	Support welcomed.
1237803	221			Ms Jeanne Alayli	South Hams Society	Nationally protected landscapes (DEV25)	7.52 wants more clarity about what constitutes “specific” local needs and the kind of “evidence” which can usefully support them.	Change to be made	Paragraphs 7.51 and 7.52 have been amended to provide greater clarity around what local housing needs means in terms of AONB villages.
1237803	431			Ms Jeanne Alayli	South Hams Society	Sustainable Development and the Climate Emergency	Welcome all local government actions which protect the countryside, wildlife, estuaries, sea and deliver green and diversity enhancing homes , buildings and infrastructure as soon as possible	Noted	The issues raised are covered within policies in the JLP, the SPD cannot set new policy.
1237803	430			Ms Jeanne Alayli	South Hams Society	TTV29.2 – Size of replacement dwelling	Support the threshold restrictions to replacement dwellings and extensions in the countryside.	Noted	Support welcomed
1237804	117			Miss Jilly Hampton		DEV10.5 – Space standards and outdoor amenity space	Different housing occupants and different types of housing require different quantities of outdoor amenity space, if at all. One size does not fit all. There does not need to be a minimum standard size of garden/ outdoor amenity space. Instead a subjective approach by the LPA is adequate.	No change	Paragraph 4.139 allows for flexibility to be used when considering minimum standards and to consider site specific circumstances.
1237804	218			Miss Jilly Hampton		DEV8.1 – Overall housing mix	New homes with 4+ bedrooms still need to come forward as these provide essential homes of a size suitable to larger working families.	No change	Neither the policy or the SPD prevents homes of any size coming forward, providing the required policy tests are met. The SHMNA identifies a need of some 4+ bed homes, but SH and WVD have the highest rates of under-occupation in housing stock in the south-west, and a more effective use of our existing housing stock is one part of ensuring we meet the needs of households of all sizes.
1237804	133			Miss Jilly Hampton		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings. Example cited regarding an extension incorrectly uses a 20% restriction, whereas the SPD currently identifies a 50% threshold for extensions.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1237804	428			Miss Jilly Hampton		TTV29.4 – Position of replacement dwelling	Objection to replacement dwelling guidance requiring original footprint to be used unless material considerations justify an alternative location.	No change	Paragraph 11.77 is clear that a replacement dwelling could be positioned in a location other than the existing footprint subject to valid planning considerations.
1237858	236	Ms Laura Wilkinson	D2 Planning Limited		Praxis Real Estate Limited	Hot food takeaways in Plymouth (DEV6)	Concerned that the SPD does not provide enough guidance or clarification on the application of the policy. The lack of recognition in the SPD of the impact that such a restriction would have on the viability and vitality of recognised District Centres is concerning. The buffer would cover the Broadway. Wording should be updated in the SPD to reflect the hearing statement produced during the JLP examination. Currently no hot food takeaways in the Broadway.	No change	<p>i. A map was submitted to the planning inspector indicating which areas of the city would be affected by this policy and it was considered before the policy was approved for adoption.</p> <p>ii. Euclid circles have been used to make the enforcement of this policy consistent across the city, this wording has been tested at planning committee without issue.</p> <p>iii. Correct, no intention to change wording (re. no recognition of units with long term vacancy)</p> <p>iv. Correct, no intention to change wording (re. no existing take always within a 400m radius - the impact on obesity of one A5 over no A5s is much more important than the difference between 1 x A5 and 2 x A5s.</p>

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1237878	256	James Tavernor	Planning Potential		CHG Property Development	Affordable Housing (DEV7-DEV9)	Support the recognition that there is an imbalance in housing provision in the TTV. 4.73 should state that certain developments such as residential care/nursing homes, student accommodation etc. should not require an affordable housing contribution rather than stating may be required.	No change	Officers consider that the wording of paragraph 4.73 is already sufficiently flexible to consider the merits of applications for residential care/nursing homes to be considered on their merits, and do not need to state that contributions to affordable housing should not be required.
1237878	261	James Tavernor	Planning Potential		CHG Property Development	Climate change, flooding, and coastal change (DEV32-DEV36)	Any strategies brought forward as part of the SPD should ensure that sustainable development is supported.	Noted	Noted.
1237878	262	James Tavernor	Planning Potential		CHG Property Development	Detailed provisions relating to the Thriving Towns and Villages Policy Area (TTV)	Due to the different characteristics of the TTV and the PPA a varied approach to development is required. Additional forms of 'employment' development should be encouraged in the TTV as many of the sites allocated have currently stalled.	No change	The AMR shows that delivery of employment land is consistent with expectations and needs. The SPD can not and should not allocate new sites for employment, this is outside its remit.
1237878	255	James Tavernor	Planning Potential		CHG Property Development	Healthy communities (DEVI-DEV6)	Recognise the overarching policies set out within Policies DEVI-DEV6 of the JLP. Development can have a major beneficial impact in terms of meeting vital health and well-being objectives, and improving the living conditions of a community. The SPD should seek to support development that improves the health of communities, including a range of facilities and services that assist in delivering a sustainable and healthy community, whilst recognising that sustainable development itself can be beneficial and should be supported.	No change	Sustainable development is well covered in both the SPD and the JLP and is at the heart of all development decisions made within the Plan Area.
1237878	257	James Tavernor	Planning Potential		CHG Property Development	Maintaining a flexible mix of employment sites (DEV14)	The SPD should support other forms of development which provide employment uses such as residential institutions, care homes and tourism. The requirement for 24 months of continuous marketing is considered onerous and not sufficiently flexible.	Change to be made in part	There is no need to set out what other forms of development might be acceptable as this is better dealt with on a case by case basis. The policy is about protecting existing employment sites in B Use Classes only. Agree to review the requirements for marketing.
1237878	259	James Tavernor	Planning Potential		CHG Property Development	Natural environment (DEV23-DEV28)	It is recognised that a healthy environment is important for existing residents, and essential for biodiversity and wildlife habitats. It is important to promote high quality development that respects, maintains, or enhances local landscape character and distinctiveness. The SPD should support planning applications that detail the measures taken to ensure the building design will be of a high standard.	Noted	This is already covered within the SPD within section DEV20 which is referenced in section DEV23.
1237878	258	James Tavernor	Planning Potential		CHG Property Development	Place shaping and heritage (DEV20-DEV22)	Supports SPD call for design quality. SPD should ensure design should also be viable and deliverable.	No change	Support welcome. No explicit change called for. Nothing in SPD promotes unviable or undeliverable design.
1237878	254	James Tavernor	Planning Potential		CHG Property Development	Sustainable Development and the Climate Emergency	Encourage the SPD to ensure sustainable development is supported, whilst bearing in mind commercial viability, and not styming future development in Plymouth and South West Devon or impacting on the delivery of the key benefits of economic development, or other planning targets set out by the Local Authorities.	Not applicable	This comment relates more to how the JLP is implemented rather than the specific guidance within the SPD.
1237878	260	James Tavernor	Planning Potential		CHG Property Development	Transport and infrastructure (DEV29-DEV31)	Recognise the need for infrastructure to be provided when planning for growth and delivering development but	Noted	Noted.

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							requirements should be proportionate and not prevent development coming forward.		
1237999	265			Louis Dulling	Bailey Partnership	DEL1.5 – Development viability	Encourage the local authorities to continue to apply a reasoned judgement on a “case-by-case” basis. Accept that this is already within the SPD but need to stress that the wider benefits of a scheme must continue to weigh in favour of an application should there be a shortfall in meeting one or more of the points set out in the JLP SPD.	No change	Viability remains a material consideration in all planning decisions.
1237999	266			Louis Dulling	Bailey Partnership	Delivering high quality housing (DEV10)	The JLP SPD is failing to provide clarity/further guidance in terms of Building for Life.	No change	The words on Building for Life are considered proportionate and are consistent with policy DEV20 which says that larger scale development should seek to address Building for Life criteria or a similar design framework. A link to the Building for Life assessment framework is provided. It is considered that there is sufficient design guidance within the SPD and its appendices, considering the scope and role of the document and balanced with the need to keep the document focused and as streamlined as possible, and to avoid undue repetition or duplication, for example by including guidance readily available elsewhere within the body of the document.
1237999	268			Louis Dulling	Bailey Partnership	DEV26.5 – Biodiversity Net Gain	Concern that SPD is introducing a quantum by which proposals should be judged which is not written into policy. DEV26.5 correctly states biodiversity net gain proportionate to development. However SPD states biodiversity net gain from all major developments when there is at least 10 per cent increase in biodiversity units. Clarity needed.	Change to be made in part	10% was indicated as the likely direction of travel nationally within the Defra consultation feedback on the Biodiversity Metric and within the Environment Bill in 2019 (which has currently been withdrawn). Whilst it is anticipated that this will remain the national direction of travel, and that eventually 10% is likely to be mandated, wording to be amended to reflect current national standards. However the LPAs consider 10% is a reasonable demonstration of measurable Biodiversity Net Gain as referenced in paras 170, 174 and 175 of the NPPF, and is the level which the LPAs will consider a development to be policy compliant.
1237999	264			Louis Dulling	Bailey Partnership	DEV29.5 – Other parking facilities (Cycle parking)	One secure cycle space per bedroom is too onerous in some locations and will reduce the viability of developments	No change	The Department for Transport ambition set out in the Cycling and Walking Investment Strategy: a safety review, November 2018 is to “make cycling and walking the natural choices for shorter journeys, or as part of a longer journey”, with a target to double levels of cycling by 2025 compared to 2013 levels. DfT figures indicate that cycling has increased by more than 50% over the past seven years in Plymouth, whilst it is understood that Exeter has also seen a substantial and ongoing increase in cycling. Families could well have more than 1 bike per bedroom, and may need to accommodate visitor's cycles. With the increasing availability of electric assist bikes, cycling is an increasingly viable option for the greater distances sometimes associated with more rural locations. Plymouth is currently benefiting from a 15 million pound investment programme in walking and cycling between 2016 and 2021, with transformational levels

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									of funding hoped for from the Transforming Cities Fund. Transport represents 30% of Plymouth's carbon footprint, a figure that is set to increase in the coming years, with transport representing a comparable proportion of carbon emissions in the rest of the JLP area. Housing constructed now must be fit for a low carbon future in which cycling will play a significant role. The standard is not considered onerous given that at least eight cycles can be stored in one car parking space, and substantially more if two tier or vertically orientated cycle parking is provided. In addition, the cycle parking can potentially be provided in multipurpose space.
1237999	263			Louis Dulling	Bailey Partnership	General	The planning context and considerations relevant to Plymouth, South Hams and West Devon differ significantly depending upon the geographical location of the application site. Welcomes the inclusion of hyperlinks within the text which direct the reader to various other guidance and information and questions whether the interactive nature of the document could be explored further. The SPD should not be used to make an alteration to the plan in light of new evidence i.e. the declaration of climate and biodiversity emergency as it could be seen to be attempting to introduce untested, unjustified and ineffective planning policy. Encourage the JLP SPD to reinforce the plan led system with regards to neighbourhood plans.	No change	The SPD is guidance only and the context for each planning application will be thoroughly considered when applied by officers. The interactivity of the SPD will be explored once the document has been adopted. Whilst the SPD does reference the climate and biodiversity emergencies this is for context only and officers are satisfied that new policy is not being introduced.
1237999	269			Louis Dulling	Bailey Partnership	Place shaping and heritage (DEV20-DEV22)	Suggests updating with reference to latest government guidance on design and including hyperlink.	Change to be made	Cross-reference to national design guide to be added.
1237999	267			Louis Dulling	Bailey Partnership	TTV26.2 – Development in the countryside	The SPD affords weight and protection to agricultural land that is not afforded within the NPPF.	Change to be made	The NPPF definition of the Best and Most Versatile Agricultural Land is acknowledged. However, the NPPF also says in paragraph 77 that local circumstances should be taken into consideration in decision making, and in an area of predominantly grade 4 and 5 agricultural land, the loss of grade 3b will be significant. The SPD does not intend to rewrite how the NPPF definition of BMV, however, in expanding upon TTV26.2, the SPD can require local circumstances to be taken into account.
1238109	278			Shane Honey	Milton Abbot Group Parish Council	Prioritising growth through a hierarchy of settlements (TTV1)	Propose a very restrictive interpretation of 'local' requiring that applicants should live within 5 miles of the proposal site.	No change	Whilst a review of local connection requirements as part of TTV1 and TTV25 will be undertaken, such a restriction is considered too onerous to enable any housing to be delivered, and would render most developments unviable and unsellable at a point in the future.
1238113	280	Phil Jones	Turley		Sutton Harbour Group	Affordable Housing (DEV7-DEV9) - Affordable Housing tenure mix	Accept the need for new affordable housing to be delivered. There's flexibility in policy DEV7 and the SPD should take the opportunity to recognise the need for such flexibility in other circumstances to recognise different context and viability.	No change	Officers consider that the existing wording already allows for consideration of viability to occur. The concern that social rent will impact on viability is noted, but it is not considered that the wording needs to be changed as all policies are already subject to

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							With regards to the tenure of affordable housing sought, the SPD updates what is there currently from a 60:40 to 65:35 split between social rented homes and Affordable Home Ownership tenures. This increase in social rented homes will affect the viability of development. The Council needs to be careful to ensure that increasingly stringent policies that affect development do not prevent development. There should be an explicit reference to the ability to consider viability as part of the tenure mix.		viability considerations this does not need to be restated.
1238113	281	Phil Jones	Turley		Sutton Harbour Group	DEV16.2 – Sequential test	Paragraphs 5.25 and DEV16 require all town centre uses outside of the defined centres to submit a sequential assessment for any proposed floor space. Sutton Harbour is not included as a defined local or district centre in the JLP and we do not agree with the arbitrary requirement for a sequential assessment to be submitted for all Town Centre uses outside of defined centres. The policy should be flexible to allow for discretion to be exercised about the need for a sequential assessment to avoid unnecessary cost and delay in the planning application process. guidance should be flexible and include caveats and Sutton harbour require increased vibrancy and activity.	No change	Requirement for sequential test is set in paragraph 86 of the NPPF and DEV16 of the JLP, not the SDP. Identifying a policy position in the SPD is not possible and contrary to national policy.
1238113	283	Phil Jones	Turley		Sutton Harbour Group	DEV29.4 – Parking provision: non-residential (EV charging points)	Suggests (a) amending 8.41 to say that existing provision of EV charging points will be considered when determining the level of new provision sought from developments of 200+ homes, and (b) text needs to recognise that reduced EV charging infrastructure provision may be appropriate if grid capacity upgrade costs are very high.	Change to be made in part	Disagree that there needs to be recognition in the text that the provision of enabled EV charging points can be prohibitively expensive if there is insufficient capacity within the electrical grid to support the additional electrical load. This infrastructure is not normally prohibitively expensive and were it to be the case for a particular development proposal, the application, those particular circumstances and those unusually high costs would be considered on their merits and with a view to development viability, the need to deliver charging infrastructure and the desire to ensure that decisions relating to the provision of community infrastructure by development deliver the greatest value to the community. However, text to be amended in part re. point of recognising existing provision of EV charging points.
1238113	284	Phil Jones	Turley		Sutton Harbour Group	DEV32.4 – Solar master plans	Solar masterplan guidance is very prescriptive requiring 60% of glazing at southerly elevations. Guidance is currently constraining not allowing for innovative design that may be a better energy usage. In order to not restrict developments to this, suggests adding a caveat to 9.30 allowing for other innovative designs and build solutions that meet sustainability aims. Proposals should also set out balance of glazing on northern elevations but ensuring there are no negative effects on neighbours and glazing is appropriate to the local conditions of the site.	No change	The SPD expands how the Policy DEV32.4 solar masterplan can be implemented and clarifies that in not all cases will it be achievable, where site conditions dictate otherwise. It is also not intended to go into extensive details which will be agreed through Building Regulations, but ensure that the benefits of solar design can be optimised in the arrangement, orientation and massing of buildings within the development.
1238113	285	Phil Jones	Turley		Sutton Harbour Group	PLY6.3 – Tall buildings	Supports Para 10.15. Does not support Para 10.11 reference to tall building applications being likely to require an EIA.	Error/clarification to be accommodated	Support welcome. Change to be made re. EIA.

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1238113	286	Phil Jones	Turley		Sutton Harbour Group	Plymouth airport (PLY42)	The SPD should include reference to the time limited safeguarding of the site and to the review of this safeguarding at the time of the first JLP review and generally be consistent with the JLP and the Inspector's Report.	No change	The JLP sets out in sufficient detail when the airport safeguarding policy will be reviewed. The SPD sets out guidance on how the JLP policy will be applied and there is therefore no need to repeat the JLP policy position.
1238113	282	Phil Jones	Turley		Sutton Harbour Group	Protecting and enhancing biodiversity and geological conservation (DEV26)	Concern that requirement for Biodiversity Net Gain from minor development may be disproportionate, and in some cases unreasonable or practical.	No change	It is considered that the language reflects proportionality/scale of impact appropriately without amendment.
1238198	311			Katie Wakefield	LiveWest	Affordable Housing (DEV7-DEV9)	The SPD makes numerous references to the need for affordable housing to be retained in perpetuity which is inconsistent with the JLP and the NPPF. Securing affordable homes for sale in perpetuity can cause issues for potential purchasers when attempting to secure mortgages and will create artificial barriers to home ownership in Plymouth and South West Devon.	Change to be made	Change to be made to reflect the NPPF.
1238198	309			Katie Wakefield	LiveWest	Affordable Housing (DEV7-DEV9) - Affordable Housing tenure mix	The affordable housing tenure mix of 65 per cent social rent and 35 per cent affordable home ownership does not feature in the JLP and should be clearly evidenced as to why this is the preferred provision. Also, the percentage of affordable housing to be provided as Affordable Private Rent on schemes which exceed the affordable housing threshold (paragraph 4.88) does not appear in the Local Plan. The reference to Intermediate Rent at paragraph 4.84 should be limited to Local Housing Allowance as with other definitions.	Change to be made in part	The wording for guidance on affordable housing tenure mix is for guidance only and to be used as a starting point for negotiation. However, officers have agreed to soften the wording so this is made clearer. Additional wording at 4.84 requiring Intermediate Rent to be limited to LHA to be added.
1238198	310			Katie Wakefield	LiveWest	Affordable Housing (DEV7-DEV9) - Affordable housing, service charges and other estate management charges in the Plan Area	Unsure how the requirement to limit service charge and estate management fees will work in practice and be enforced.	No change	This guidance has been effective and used when it was included in the previous SPD and has already been made more flexible to take on board RP concerns.
1238198	308			Katie Wakefield	LiveWest	Affordable Housing (DEV7-DEV9) - Affordable Private Rent in the Plan Area	Paragraph 4.89 provides guidance on Affordable Private Rent, but the NPPF states that its inclusion must be justified. It could be implied that its inclusion is part of a wider 'Build to Rent' scheme, but we cannot see that this is clarified in the SPD. How will the requirement be secured? It is assumed that this will be through a Section 106 Agreement but given its absence in DEV7-DEV9 this needs to be explicitly stated. DEV7.2 in the JLP does not provide a target percentage for the affordable housing requirement for Build to Rent. This should be corrected in paragraph 4.75 of the SPD.	No change	Officers disagree and believe this guidance gives flexibility to negotiate on a case by case basis.
1238198	312			Katie Wakefield	LiveWest	DEV12.9 – Future proofing	It is suggested that in relation to purpose built student accommodation, the internal designs should allow for efficient conversion to create affordable dwellings which meet NDSS.	Change to be made	All new planning applications for purpose built student accommodation will be assessed by the criteria prescribed in policy DEV12. As part of this assessment, due regard will be had to how buildings could be adapted in the future where the onus will be on the developer to provide this information. Alternative uses

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									are not limited to dwellings, but should dwellings be identified as a likely alternative use, they would be required to conform to NDSS in accordance with policy DEV10; paragraph amended to include reference to NDSS to emphasis this point.
1238198	314			Katie Wakefield	LiveWest	DEV26.5 – Biodiversity Net Gain	Supports protection and promotion of biodiversity. However Environment Bill yet to be enacted and recommends SPD being drafted in a way to allow for changes to current government proposals. SPD should not impose additional policy and would caution against prescribing a mandatory target unless evidence that percentage is deliverable and not slow down delivery of development.	Change to be made in part	10% was indicated as the likely direction of travel nationally within the Defra consultation feedback on the Biodiversity Metric and within the Environment Bill in 2019 (which has currently been withdrawn). Whilst it is anticipated that this will remain the national direction of travel, and that eventually 10% is likely to be mandated, wording to be amended to reflect current national standards. However the LPAs consider 10% is a reasonable demonstration of measurable Biodiversity Net Gain as referenced in paras 170, 174 and 175 of the NPPF, and is the level which the LPAs will consider a development to be policy compliant.
1238198	306			Katie Wakefield	LiveWest	DEV8.1 – Overall housing mix	Support the intention to ensure there is a balance in house types, but paragraph 4.18 is confusing and poorly drafted. It may be easier to implement if X% of each property type (defined by number of bedrooms/persons) on a scheme or phase, should be no more than Y% larger than NDSS.	Change to be made	Propose removing the para.
1238198	307			Katie Wakefield	LiveWest	DEV8.1(i) – Redressing imbalance	Whilst paragraph 4.22 allows for local circumstances to be considered during discussions with the LPA on the housing mix, this flexibility should also be applied to paragraph 4.23.	No change	The required flexibility has been written into 4.23.
1238198	313			Katie Wakefield	LiveWest	Place shaping and the quality of the built environment (DEV20)	Suggests including reference to Nationally Described Space Standards in the adaptation of student accommodation to residential.	Change to be made	Officers agree with the change to be added.
1238198	315			Katie Wakefield	LiveWest	Planning obligations, the Community Infrastructure Levy and development viability	12.40 - pre-application discussions are welcomed but it is considered beneficial to have a commitment that advice given on planning obligations at this stage will not change provided that the application is no materially different.	No change	The level of detail on planning obligations that can be provided at the pre-application discussion stage depends on the fullness of the details that are provided by the applicant at that stage. The councils endeavour to provide as full and detailed information on planning obligation 'asks' as is possible based on the submitted pre application information. If these are at full application level, then there should be little or no substantial change when a matching full application is submitted, subject to any new information that might materialise.
1238227	342			Alex Perraton	BBH Chartered Architects Ltd	Affordable Housing (DEV7-DEV9) - Off-site provision and commuted sums in the Plan Area	4.111 - assume this is 1,000sqm of C3 residential floorspace? This needs to be clarified. Such contributions from commercial developments or mixed- use developments would likely result in viability issues.	Change to be made	Change to be made to improve clarity.
1238227	352			Alex Perraton	BBH Chartered Architects Ltd	APPENDIX I: Residential extensions and alterations	(Para. 13.41 and 13.42) A 2m recommended set back for side extensions is too onerous.	No change	Paras 13.41 and 13.42 specifically relates to the potential "terracing" effect and not all side extensions. Para 13.38 states "The individual characteristics of the site and proposal will determine the exact set back distance required, however a distance less than 1m will rarely be

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									<i>considered acceptable</i> " which allows for specific site circumstances to be taken in to account.
1238227	343			Alex Perraton	BBH Chartered Architects Ltd	DEV10.4 – Residential annexes	Self-contained annexes should be supported for elderly and younger family members and, subject to the use of appropriate planning conditions, can provide a valuable form of additional housing.	Change to be made	The SPD does not seek to refuse annexes in principle. Rather it seeks to resist annexes that demonstrate little dependence on the main dwelling ie are self-contained. Change made to improve clarity.
1238227	344			Alex Perraton	BBH Chartered Architects Ltd	DEV10.5 – Space standards and outdoor amenity space	Different housing occupants and different types of housing require different quantities of outdoor amenity space, if at all. One size does not fit all. There does not need to be a minimum standard size of garden/ outdoor amenity space. Instead a subjective approach by the LPA is adequate. 4.148 – Too vague in some areas and too prescriptive in others: "Where possible..... stacking principles..." or "generally avoided"	No change	Paragraph 4.139 allows for flexibility to be used when considering minimum standards and to consider site specific circumstances. Paragraph 4.148 highlights some key considerations for flat conversions, specific site circumstances may allow for some flexibility.
1238227	345			Alex Perraton	BBH Chartered Architects Ltd	DEV14.1 – Change of use of existing employment sites	The requirement to market the building for 24 months is an onerous requirement. The building could fall into a state of disrepair during that time. Could also include a reference to mixed use development	Change to be made	Agree to amend to reduce the time to market the site. It is not considered necessary to include mixed uses within the guidance.
1238227	346			Alex Perraton	BBH Chartered Architects Ltd	DEV24.1 and DEV24.2 – Coastal location	Paragraph 7.27 onwards - trying to restrict new housing in coastal locations with a local connection criteria will most likely increase the value of the existing housing stock putting it more out of reach for local people on low incomes and development is often is not viable for developers with this restriction. 7.33 – Camping etc: No reference to existing sites and whether they will be allowed to develop / update their existing facilities to meet changing needs and to hopefully improve their appearance. 7.37 – Subjective and could be read to mean that all windows need to be rectangular / square and small with doors minimal width.	No change	7.27 – policy DEV24 only seeks to ensure that land-use change does not degrade the undeveloped character of the policy area, and as such potential anecdotal impacts on house prices are beyond the scope of the policy. 7.33 – policy DEV15 needs to be read alongside DEV24, as it states under what circumstances existing camping facilities may expand. 7.37 – the current text provides sufficient guidance as to what is considered acceptable, and the type of harm that the LPA will resist.
1238227	348			Alex Perraton	BBH Chartered Architects Ltd	DEV32.3-DEV32.6 – Energy statements and methodology	Energy Statement for major developments is very onerous. Technical details often completed at building control stage post planning. Recommends energy statements at planning stage being derived in more of an indicative manner.	No change	Energy Statements have been a requirement of the previous adopted policy as well as the JLP. Early evaluation of the options are important to ensure the outcomes can be achieved. If the application is outline, further details can be conditioned for submission at the reserved matters stage.
1238227	339			Alex Perraton	BBH Chartered Architects Ltd	DEV8.1 – Overall housing mix	New homes with 4+ bedrooms still need to come forward as these provide essential homes of a size suitable to larger working families. Section 4.16 refers to an Affordable Housing need assessment. South Hams doesn't just need affordable housing.	No change	Neither the policy or the SPD prevents homes of any size coming forward, providing the required policy tests are met. The SHMNA identifies a need of some 4+ bed homes, but SH and WD have the highest rates of under-occupation in housing stock in the south-west, and a more effective use of our existing housing stock is one part of ensuring we meet the needs of households of all sizes. Para 4.16 makes reference to the SHMNA part 2, which also contains required thresholds for a range of housing tenures, including open market.
1238227	340			Alex Perraton	BBH Chartered Architects Ltd	DEV8.1(i) – Redressing imbalance	For small scale housing developments of less than 6 units it is often incredibly difficult to achieve viable developments. It is for this reason that Off-site affordable housing	No change	As above, local connection restrictions only apply to tier 4 locations, and in accordance with TTV1 will apply to a very small percentage for the overall supply.

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							contributions are not sought. Restricting unit sizes with fewer bedrooms and introducing 'local connection' restrictions will only exacerbate the unviability of developments of this small scale. Such small size developments should be exempt from the requirements of DEV8 in line with the NPPG. Planning obligations for affordable housing should only be sought for residential developments that are major developments. Once set, the Community Infrastructure Levy can be collected from any size of development across the area. Therefore, the levy is the most appropriate mechanism for capturing developer contributions from small developments. NPPF defines major development. In designated rural areas LPAs may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1985 , which includes National Parks and AONBs. Planning obligations should not be sought from any development consisting only of the construction of a residential annex or extension to an existing home.		CIL comment is currently moot as no CIL applies in TTV.
1238227	341			Alex Perraton	BBH Chartered Architects Ltd	DEV9.2 - Self and custom build housing	Para. 4.34 onwards - further clarity is required with regards to 'Self and custom build housing' – is this just referring to Affordable Homes?	Change to be made	Officers consider that it would be helpful to confirm that this section relates to all forms of self and custom build housing, both market and affordable.
1238227	349			Alex Perraton	BBH Chartered Architects Ltd	Prioritising growth through a hierarchy of settlements (TTV1)	Suggests that by restricting new housing to requiring local connection will result in poor housing supply and viability issues.	No change	The use of local connection restrictions on housing in certain locations will be monitored on an annual basis. The intention is to ensure more equitable access to the housing market for people who have established local connections. If there is no justified need, then the permission should not be given in the first place. This comments seems to assume that all housing needs to generate a market average return for the developer. Housing that meets local needs is not expected to generate the same financial return and an unrestricted open market dwelling. Part of the 'profit' can be measured in social benefit.
1238227	347			Alex Perraton	BBH Chartered Architects Ltd	Specific provisions relating to transport (DEV29)	Para. 8.6 onwards - figures should be indicative LPAs should also assess whether car parking is essential in more sustainable locations in towns and villages where there are access to public transport and local services and amenities. Why are garages bigger than parking spaces?	Noted	Comments noted re. car parking standards. Agreed lower standards of car parking can be considered for more sustainable locations and the current wording in the SPD allows for this. Longer garages are required to allow for EV charging and allow garages to still be used for storage purposes but still allow car parking to be accommodated.
1238227	350			Alex Perraton	BBH Chartered Architects Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings. Example cited regarding an extension incorrectly uses a 20% restriction, whereas the SPD currently identifies a 50% threshold for extensions.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1238227	351			Alex Perraton	BBH Chartered Architects Ltd	TTV29.5 – Extension scale and design	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

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1238229	370			Mike Derry	Derry Owen Architects	DEV10.4 – Residential annexes	Disagrees that self-contained annexes should not be supported and don't think this is the intention of DEV10. Self-contained annexes should be encouraged as long as they are ancillary to main dwelling.	Change to be made	Agree with the comment, and agree that DEV10 doesn't seek to resist annexes in principle. SPD wording to be amended to reflect that officers will be looking carefully at annexes and, if officers think what is proposed is actually a self-contained dwelling (comprising of a new planning unit independent of the main dwelling) purporting to be an annex, then it will be resisted as it should be tested as such against the full suite of relevant policies.
1238229	371			Mike Derry	Derry Owen Architects	DEV10.6 – Development of garden space	Development within gardens shouldn't be judged differently from other applications as it safeguards greenfield land.	Error/clarification to be accommodated	Wording added for clarification.
1238229	372			Mike Derry	Derry Owen Architects	DEV21.3 – Non-designated heritage assets (NDHAs)	Suggests creating a local list and seeking clarification on responsibilities.	No change	Officers welcome the comments regarding the production of 'local lists' to enable the identification of non-designated heritage assets. Currently, the identification of all heritage assets is being promoted through the production of Neighbourhood Plans and is it common practice for non-designated heritage assets to be listed within an Appendix to the Plan. Buildings and structures that offer a 'positive contribution' to the special character and appearance of Conservation Areas are also highlighted within Conservation Area Character Appraisals (where they exist).
1238229	373			Mike Derry	Derry Owen Architects	Development in the countryside (TTV26)	Want more guidance on certain parts of TTV26, and with greater emphasis on design-led applications. Suggests that the relationship with Class Q should be considered as justification for certain types of proposals.	No change	Guidance for TTV26 needs to be considered alongside the rest of the policies in the plan, not least SPT1, SPT2 and TTV1. This provides sufficient guidance as to the types of development that could be considered acceptable providing they meet specific policy requirements. This is exactly what TTV26.2 does. To suggest that the principle of development should be considered differently depending on the perceived design quality of an application risks undermining the spatial strategy of the plan.
1238229	367			Mike Derry	Derry Owen Architects	General	SPD is large and detailed and sets out a much more prescriptive approach with respect to design. The guidance introduces lots of generic standards which are unlikely to be relevant to a lot of applications which should be considered on their individual merits and in response to their own unique and site-specific issues. Should be made clearer that generic design standards are only to be used as approximate guidance to help inform the design process. Guidance should stress the requirement for high quality design and warn of the dangers of specific standards which run the risk of a 'design by numbers' approach. Guidance should give weight to the views of experienced and qualified architects, especially those who have an established track record of designing successful and attractive buildings, when establishing what constitutes good design.	No change	Officers believe the guidance to design is helpful and reference is already made in the SPD to understanding the context of an area.
1238229	369			Mike Derry	Derry Owen Architects	Meeting local housing need in the Plan Area (DEV9)	Self-build and custom housing covers a large proportion of planning applications for example individual's replacement dwellings or people building houses in their gardens for themselves to live. This should be made clearer in the	No change	Officers disagree that a self and custom build dwelling should not be subject to the requirements of DEV8. DEV9 recognises that these dwellings have an important part of play in terms of diversifying the

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							guidance. This sort of development should be supported and DEV9 should be the relevant Policy, rather than DEV8, in these cases.		mechanism of housing supply and DEV8 seeks to ensure that housing delivered meets the identified needs within the policy area. As such, both are applicable and one does not over-ride the other.
1238229	368			Mike Derry	Derry Owen Architects	Meeting local housing need in the Thriving Towns and Villages Policy Area (DEV8)	DEV8 should not be too strictly applied at the expense of other policies. Guidance should be clearer that it should apply to larger housing schemes where there is more scope to provide a greater mix of dwellings. DEV8 should apply to developer housing and not projects for individuals to which DEV9 is more appropriate. Inappropriate to use DEV8 for schemes of 1 or 2 new houses where more site-specific factors should be given greater weight to ensure high quality design. Don't think that the guidance should include local connection requirements because this is contrary to DEV8 which calls for a 'wide choice of high quality homes' which 'create sustainable, inclusive and mixed communities'. Whilst the guidance concentrates on restricting large new dwellings where there is an imbalance, is this true for smaller dwellings? Lots of neighbourhood plans are including primary residence restrictions to prevent second home ownership but this is having unintended consequences of artificially lifting existing house prices to the benefit of existing homeowners and reducing the number of new houses being built. Guidance provides an opportunity to highlight this and offer encouragement to people who may want to move to the area and even second homeowners who invest money and provide jobs in the area and boost local tourism.	No change	DEV8 applies with full weight to applications for all scales and types. This is to ensure equitable access to new housing for local people as outlined in the JLP Vision and Strategic Objective SO6. There are a wide number of external factors that influence house prices and it is impossible to disaggregate the impact on house prices of one policy intervention.
1238763	412			Thomas Bristow		Delivering low carbon development (DEV32)	Threshold criteria for energy efficiency is set out for major developments. However recommends adding clarity if policy also applies to minor development.	Change to be made	Further clarification has been added around expectations, including clarification that Householder applications will not be subject to the same requirements.
1238763	413			Thomas Bristow		Development in the countryside (TTV26)	Response identifies some inconsistencies in TTV26 guidance, in particular with regard to how case law will be applied to determine if a proposal is 'isolated'. Also considers how local connection and settlement hierarchy could be clarified, and how local connection could be applied in Undeveloped Coast.	Change to be made	Agree that para 11.48 should be more explicit about how the Braintree Ruling will be applied. In this regard it is proposed to amend the paragraph and delete the last sentence. Review all TTV26 and TTVI content with regard to settlement hierarchy, and where a local connection may be required to ensure housing proposals meet local needs.
1238763	411			Thomas Bristow		Undeveloped Coast and Heritage Coast (DEV24)	It seems that the justification for a coastal location can result from an established need at parish level (or indeed in adjoining parishes). Given the strong protections accorded to the undeveloped coast, presumably where a parish is part in part out of the undeveloped coast (or is the case of a neighbour) there should be a preference for development to be brought forward outside of the designation?	Change to be made	Agree that the requirements of DEV24.2 would benefit from greater clarity. These comments are reflected in changes to para 7.28.
1238797	433			Andy Braund	Cruse and Bridgeman	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	The council has a duty to meet our identified housing needs, not to build only what the market demands. The market caters for buyers with economic choice, and the TTV is an affluent area, but wealth is not held equitably across the population. We have an evidence

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									base that is showing smaller households increasing throughout the plan period, plus the highest proportion of under-occupation of our existing stock in the south-west The demographic profile of both SH & WD continues to be top-heavy, showing an ongoing deficit of young people and young families. We need a long term strategy for building resilience in our communities, not a short-term aim to meet whatever house builders think they can sell the quickest. The use of high values areas was considered in the EiP and removed from the draft plan at the request of the Inspectors.
1238797	432			Andy Braund	Cruse and Bridgeman	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239281	435			James Fisher		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239281	436			James Fisher		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239298	438			William Jackson		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239298	439			William Jackson		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239301	440			Richard Lawson		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239301	441			Richard Lawson		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239323	442			Mr and Mrs Rowden		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239323	443			Mr and Mrs Rowden		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

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1239328	444			Darren Hurley		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239328	445			Darren Hurley		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239333	446			Joshua Murkin		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239333	447			Joshua Murkin		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239334	448			Luke Hill		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239334	449			Luke Hill		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239337	450			Peter Chioccola		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239337	451			Peter Chioccola		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239343	452			Nigel Timmis		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239343	453			Nigel Timmis		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside. Worried about what the restrictions will have on viability.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239349	454			Garry Elliott		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239349	455			Garry Elliott		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

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1239353	456			Ian Parfitt	RPA Investments Ltd	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239353	457			Ian Parfitt	RPA Investments Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239359	458			Rory Watson		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239359	459			Rory Watson		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239364	460			Ciaran Mcclennon	Ciaran Mcclennon Building Contractors Ltd	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239364	461			Ciaran Mcclennon	Ciaran Mcclennon Building Contractors Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239365	462			Ian Phillips	Van Ellen Sheryn Chartered Architects	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239365	463			Ian Phillips	Van Ellen Sheryn Chartered Architects	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239366	464			Richard Goulden	Goulden & Sons	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239366	465			Richard Goulden	Goulden & Sons	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239368	466			Stan Wallis		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239368	467			Stan Wallis		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

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1239390	468			Matthew Robinson	JAM Interiors Group Ltd.	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239390	469			Matthew Robinson	JAM Interiors Group Ltd.	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239395	470			Raymond Keith Boxwell		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239395	471			Raymond Keith Boxwell		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239396	472			Pam St Leger		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239396	473			Pam St Leger		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239398	474			Tony Doidge		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239398	475			Tony Doidge		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239399	476			Carole Reynolds-Jones		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239399	477			Carole Reynolds-Jones		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239400	478			Nick Wotton		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239400	479			Nick Wotton		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

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1239401	480			Daniel Mitchell		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239401	481			Daniel Mitchell		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239402	482			Scott Wallis	SCP Building Products	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239402	483			Scott Wallis	SCP Building Products	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239404	484			Steve Heaver	Harrison Sutton Partnership	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239404	485			Steve Heaver	Harrison Sutton Partnership	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239406	486			Emma Heaver		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239406	487			Emma Heaver		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239409	488			Tony Wallis	Southfield Windows Ltd	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239409	489			Tony Wallis	Southfield Windows Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239411	490			Stephen and Suzette Jagger		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239411	491			Stephen and Suzette Jagger		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

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1239413	492			Chris Cunningham	Harrison Sutton Partnership	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239413	493			Chris Cunningham	Harrison Sutton Partnership	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239415	494			Mark Simpson	By The Dart Ltd	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239415	495			Mark Simpson	By The Dart Ltd	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239417	496			Nick Crispin	Cruse and Bridgeman	DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239417	497			Nick Crispin	Cruse and Bridgeman	TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239419	498			Nicholas Cordrey		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239419	499			Nicholas Cordrey		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239429	500			Janet Brooking		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239429	501			Janet Brooking		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239431	502			Phillip Brooking		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239431	503			Phillip Brooking		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

Consultee ID	Comment ID	Full Name (Agent)	Company / Organisation (Agent)	Full Name (Consultee)	Company / Organisation (Consultee)	Document section	Comment summary	Summary statement	Detailed response
1239433	504			Natalie Brooking		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239433	505			Natalie Brooking		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239435	508			Chris Warren		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239435	509			Chris Warren		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239438	512			Darren Roach		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239438	513			Darren Roach		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239458	514			Nick Alford		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239458	515			Nick Alford		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1239565	516			Andrew Hawes		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1239565	517			Andrew Hawes		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.
1245681	518			Peter Williams		DEV8.1 – Overall housing mix	The approach to restricting bedroom numbers is too broad-brushed and does not adequately address the problem in balancing housing stock, particularly when taking high-value areas into account.	No change	Housing mix was considered during EiP, in particular use of SHMNA data. High value areas were considered in EiP and removed from the draft plan.
1245681	519			Peter Williams		TTV29.2 – Size of replacement dwelling	Objects to threshold restrictions to replacement dwellings and extensions in the countryside.	Change to be made	TTV29 guidance reviewed and updated to clarify where and how thresholds will apply and what degree of flexibility will be applied when considering site specifics.

APPENDIX II: SUMMARIES OF AND RESPONSES TO THE COMMENTS RECEIVED ON THE DEVELOPER CONTRIBUTIONS EVIDENCE BASE

Consultee ID	Comment ID	Full Name (Agent)	Organisation (Agent)	Full Name (Consultee)	Organisation (Consultee)	Comment summary	Summary statement	Detailed response
516021	405	Mr David Seaton	PCL Planning Ltd		Waddeton Park Ltd, Baker Estates Ltd, Blue Cedar Homes Ltd, Bovis Homes Ltd, KIER LIVING SOUTH WEST LTD, Southern Properties	It is considered that the evidence base document is a further subject area where new development management policy is being presented and that it represents a flawed approach to the subject, referring to the 3 tests identified at CIL regulation 122. It is stated that the tests need to be considered on a case by case basis and that regard should be given to available capacity in the vicinity of a development proposal in order to determine whether a developer contribution is sought.	Change to be made	It is not agreed that the Developer Contributions Evidence Base presents new policy. The Evidence Base is an evidence base document that supports the SPD in informing policies of the Joint Local Plan. As at para.1.1, the Evidence Base sets out how developer contributions have been calculated. The Evidence Base has full regard for the 3 tests at CIL regulation 122, as referred to at para. 1.5, however reference to regulation 123 will be removed to better reflecting the September 2019 CIL Regulations. Paras. 12.24 and 12.25 of the SPD clearly make reference to the 3 tests. Para. 1.5 makes it clear that the Evidence Base is an aid to the negotiation process and that planning obligations will be negotiated on a case-by case basis and will need to meet the requirements of CIL regulation 122. Capacity and need are taken into account in determining whether a developer contribution is sought.
1002212	177			Mike Deaton	Devon County Council	At Para 3.2, it should be identified that the DCC approach to securing education contributions in South Hams and West Devon is broadly consistent with that used by PCC but is included in a separate document. At para 3.3, that this refers to DfE guidance from March 2019, which was updated and reissued in November. At para. 3.16 West Devon Borough Council has a different approach to Devon County Council in terms of Section 106 requests from affordable housing; and, that it is stated that affordable housing is included in capacity and contribution calculations, demonstrating that the document would support the Devon County Council approach as Education Authority.	Change to be made	It is agreed that a link to Devon County Council's approach to education contributions in South Hams and West Devon would be useful and will be added and, that it should be stated at para. 3.2 that the DCC approach to securing education contributions in South Hams and West Devon is broadly consistent with that used by PCC. References to guidance to be updated. Para 3.16 refers to Plymouth City Council only. It is noted that West Devon has a different stance but this should be referred to as part of Devon County Council's approach to education contributions.
1002212	184			Mike Deaton	Devon County Council	DCC supports inclusion of the three documents that support policy DEV23 and are shared and used by DCC.	Noted	Support welcomed
1002212	181			Mike Deaton	Devon County Council	Devon County Council notes that whilst there has been close collaborative working with Plymouth, South Hams and West Devon councils to achieve consistency of approach across the JLP area, there are still discrepancies. Examples includes different approaches to pupil places ratios and consequently different costs for different house sizes between Plymouth and South hams / West Devon councils; and, that Plymouth assumes a higher rate of special educational needs of the school population.	No change	There has been close working with Devon County Council to seek an alignment of approaches for consistency across the Plan area. This has been broadly achieved but has not always been possible. In part, this reflects the fact that Plymouth is an urban unitary authority whilst South hams and West Devon councils are largely rural districts, as set out at para 1.2.
1002212	183			Mike Deaton	Devon County Council	DCC supports DEV 1, DEV1.3 and DEV6 and recommends in future plan updated that it is extended to South Hams and West Devon as well as Plymouth.	Not applicable	Comment noted but this is out of the remit of an SPD.
1002212	180			Mike Deaton	Devon County Council	Due to % of people aged 65-84 in South Hams and West Devon, recommends consideration in future update of the plan for consideration to adaptable homes.	No change	This is something which will need to be considered in the future. Currently we don't have the justification or evidence to adjust contributions based on age group and the JLP does not have a specific policy for delivering housing for older people
1003640	397	Ian Jewson	Walsingham Planning		Bovis Homes Limited	Clarification is sought re the material status of the Developer Contributions Evidence base and to processes for developer contributions that are considered by Devon County Council.	No change	The Developer Contributions Evidence Base is an evidence base document that supports the SPD in informing policies of the Joint Local Plan and this made clear in both the SPD and

Consultee ID	Comment ID	Full Name (Agent)	Organisation (Agent)	Full Name (Consultee)	Organisation (Consultee)	Comment summary	Summary statement	Detailed response
								the evidence base. It would be a material consideration – as would all documents or factors which have a bearing upon a decision. Devon County Council is responsible for transport, education, health, recycling centres and has separate approaches re. developer contributions which the county council refers to in commenting on planning applications in South Hams and West Devon.
1236973	36			Mrs Julie Gilbert	Ivybridge Town Council	Ivybridge Town Council notes that S106 is sought towards healthcare provision in Plymouth and that this has also been sought in Ivybridge but that it is predominantly allocated to green spaces and playing pitches. It is also requested that information regarding 106 allocations for South Hams should also be incorporated in this document rather than needing to be referenced elsewhere in a separate publication.	Change to be made	Devon County Council provides separate guidance on S106 contributions towards healthcare in South Hams and West Devon. Devon County Council is a consultee rather than a direct contributor to the Joint Local Plan SPD. However a link to Devon County Council's approach to healthcare will be added.

APPENDIX III: SUMMARIES OF AND RESPONSES TO THE COMMENTS RECEIVED ON THE BARN GUIDE

Consultee ID	Comment ID	Full Name (Agent)	Organisation (Agent)	Full Name (Consultee)	Organisation (Consultee)	Comment summary	Summary statement	Detailed response
458962	5			Helene Jessop	RSPB (Royal Society for the Protection of Birds)	<p>Wildlife section - should be expanded to cover specific matters such as legal protection of species, the different nesting behaviours and requirements of species and biodiversity net gain.</p> <p>The Setting (Page 31) Final column beginning "Boundary structures . . ." Recommends the final sentence is amended to specify planting of indigenous and locally occurring hedgerow species.</p> <p>(Page 33) Final column and para beginning "Suburban style flower or shrub beds. . ." Recommends this is amended to use species, ideally native ones, that flower and provide nectar for pollinating insects, and also to mention that avoiding a manicured approach to management of any retained plants or new 'soft landscaping' is beneficial to biodiversity.</p>	Change to be made	Officers agree that the suggested amendments would be helpful.
524152	7			Mrs Maureen Hodgins		Supports the adoption of the Barn Guide.	Noted	Noted
1011730	414			CMH Brady		<p>Overall support for the Barn Guide and various points made</p> <ol style="list-style-type: none"> 1. There is no suggestion that the depth of window reveals should be retained in the case where an opening is retained, nor that the evidence be used to set the depth of reveals in new openings where these have to be made. 2. Document does not tackle the question as to how a stone plinth at the base of a cob wall should be treated. 3. Question extensions and ensuring authentic character is maintained through an appropriate design response. 4. Solar panels have a detrimental visual impact. 5. Question the availability of suitable stone. 	No change	<p>Support welcomed.</p> <ol style="list-style-type: none"> 1. Officers feel that this is covered in the existing text. 2. The Barn Guide is not aimed at being prescriptive to this level of detail. Such matters would be considered as part of the planning process. 3. The issue of design and appropriateness of extensions (in principle) is covered in the body of the text. The Barn Guide offers guidance on such matters rather than prescriptive architectural design solutions. 4. Officers acknowledge the point raised however, solar panels would need to be considered on a case by case basis as part of the overall planning process. 5. The use of appropriate walling materials is covered in the existing text.