



**West Devon
Borough
Council**

West Devon Borough Council

Summary of Consultation Responses (Regulation 19 Publication Version)

August 2015

The following table sets out the respondent number, name and organisation for all of the responses received.

1	Maureen Bridge	
2	Mrs A Hopwood	
3	Hilary Boot-Hanford	
4	Nikki Griffiths	
5	Janice Alexander	Devon Rural Housing Partnership
6	Mr Julian Pressey	
7	Mr Dave James	
8	Jeremy Davies	
9	Mr Clive Coles	
10	Sabine Romero	
11	Mr Robert Mountjoy	
12	Mrs Mary Grafton	
13	Graeme McGregor	
14	Nicola Dickson	
15	John Streeter	
16	Dr R.M and Mrs P.S.Hodgson	
17	Dr Martin Walker	
18	Barbara Hobbs	
19	Gerald Hobbs	
20	Ian Vincent	
21	Neil Price	
22	Nigel Twinn	
23	Malcolm Pollock	
24	Ken Darby	
25	Michael Davies	
26	Dr Michael Ireland	
27	Roger Downing	
28	George	
29	Dr Rebecca Anaspure	
30	Dr David Benzie	

31	Mrs M Pegg	
32	Mrs G Doble	
33	A M Spry	
34	Mr and Mrs Smart	
35	Clive Collier	
36	Mr and Mrs Jackson	
37	Howard Asbridge	Milton Abbot PC
38	Denise Head - Parish Clerk	Sydenham Damerel PC
39	Sarah & Jonathan Unsworth-White	
40	Sandra Tweedie	
41	Livia Germano	
42	David Incoll	
43	Debbie Ashton - Parish Clerk	Buckland Monachorum PC
44	Sue Eberle	
45	John Bromhead	
46	Justin Milward	The Woodland Trust
47	Mrs P M Taylor	Bere Ferrers PC
48	Mrs Chris Blood	
49	Mr Steve Blood	
50	Mr & Mrs Durham	
51	Name unreadable	
52	Mr Glen Wise	
53	Mr D Sharp & Ms D Stratton-Smith	
54	Mr & Mrs M & K Smith	
55	J Hall	
56	R. A. Lock	Hatherleigh PC
57	Clare Tyson	
58	Michael & Lisa Wood	
59	Michael Calder	National Trust
60	Mr & Mrs Hughes	
61	Mr & Mrs D Mahoney	

62	Mrs Marilyn Weeks	Exbourne & Jacobstowe Parish Council
63	Capt & Mrs P Boundy	
64	Peter Creber	
65	Ms W Curry	
66	Mrs Elsie Jenkin	
67	Mr & Mrs Woock	
68	Mr & Mrs Friend	
69	Mrs Bidy Grey & Mr Richard Newbold	
70	Major General N Vaux	
71	David Pickles	
72	Sarah-Jane Barr	Devon and Cornwall Police
73	N J Walker	
74	Ian & Kathryn McClumpha	
75	Elliot Jones	Boyer Planning
76	Mike Phelan	
77	Hilary Winter	Devon Countryside Access Forum
78	Jacquelyn Fee	Mobile Operators Association
79	David Marshall	
80	Paul Vachon	
81	Gaynor Gallacher	Highways England
82	Craig Barnes	Gladman
83	Gary Parsons	Sport England
84	Gillian Hiles	
85	John Brodribb	
86	W Lewis	
87	Dave Martin	
88	Aaron Smith	Fowler Architecture & Planning
89	Simon Russell	Amethyst Planning
90	Amy Roberts	Bell Cornwell
91	Joe Keech	Devon County Council
92	Ken Farnham	

93	Ross Anthony	The Theatres Trust
94	James Cox	
95	Alison Clish-Green	
96	Sue Eberle	Sourton Parish Council
97	Tetlow King Planning	South West HARP Planning Consortium
98	John Gozzard	
99	Dorothy Gennard	
100	J & R English	
101	Chris Miller	
102	Sheila Smith	
103	Mrs Laura Horner	Natural England
104	Robin Musgrave	
105	Robin & Annette Carr	
106	Mark Sawyer	
107	Brian & Diane Biggadike	
108	June Marshall	
109	Lorraine Burrell	
110	Paul Saunders	
111	Gill Saunders	
112	Mr Andrew Elliott	
113	Simon Jackson	
114	Bob Rush	
115	Andrew & Nicolette Overy	
116	Mrs Valerie Cushing	
117	Mr P & Mrs S Challiss	
118	Beryl Holley	
119	John Taylor	Kelly College
120	Dr John Ellis	
121	CSJ Planning Consultants	Renewable Energy Systems Limited
122	Paul Snell	Okehampton Town Council
123	WYG	Linden Homes
124	Graham Parker	

125	Adam & Marisa Hedley	
126	Jane Gillard	Okehampton Hamlets Parish Council
127	Mr & Mrs D M Latham	
128	PCL Planning	Barratt Homes (South West) Ltd
129	NUMBER NOT USED	
130	Mike Palmer	
131	Sue Green	Home Builders Federation
132	Christine Harbottle	
133	Paul Bamford	
134	Sue Mackenzie-Philps	
135	Michael Symons	
136	R I Stewart	
137	C Brady	
138	Ian Jewson Planning Ltd	Bovis Homes Ltd
139	Alison Wright	
140	Hoddell Associates	On behalf of Mr D Luxton
141	Chris Beasley	
142	Hoddell Associates	On behalf of W J Avery Will Trust & Mr S & Miss J Shobbrook
143	Robert Flexman	
144	Planware Ltd	
145	WYG	On behalf of Hannard Developments
146	Miss Lily Holt-Martyn	
147	Andrew McNaughton	On behalf of Paul Hunt Developments (Devon) Ltd
148	Ed Persse	EJFP Planning Ltd
149	Nick Holt-Martyn	
150	Dan Janota	Dartmoor National Park
151	Devon Archaeological Society	
152	Bob Cocker	
153	Ross Simmonds	Historic England
154	Brian Moore	Lifton Parish Council
155	Paul Brimble	

156	Kate Royston	Transition Tavistock & SW Devon Community Energy Partnership
157	Smiths Gore	On behalf of the Hardicott Estate
158	Iain Grant	
159	Richard Goodfellow	
160	Dave Weeks	
161	Ros Rice	North Tawton Town Council
162	Steve Adams	
163	Leigh Hackel	
164	Marcus Salmon	Environment Agency

Introduction

Policy/Para/Section	Rep no.	Key Issue(s)
Page 3	150	Dartmoor National Park Authority suggests it should be made clearer that whilst there are objectives that may apply borough wide, essentially Our Plan is a development plan. On this basis, the diagram on page 3 should more clearly exclude the National Park.
Introduction Para 1.7	151	Devon Archaeological Society notes that Our Plan refers to Natural Environment as an Objective but this is limited to the natural environment (biodiversity/flora & fauna).It should also refer to the historic environment. Most people see the environment in its broader sense as both places and landscape.

Our Partners

Policy/Para/Section	Rep no.	Key Issue(s)
Our Partners	47	Bere Ferrers Parish Council suggest including a comment on the re-opening of the rail line providing an alternative to road travel where it references the A386.
Our Partners/ Statement of Consultation	88	Section does not mention the DTC, its relevance to plan-making or how it has been fulfilled. Statement of Consultation does not confirm that no other body cannot wholly meet their development needs in their own area or that West Devon have discussed their inability to meet its own need in full with a neighbouring authority. In particular Dartmoor Core Strategy for DNPA shows a shortfall in delivery for this area. Should not proceed to submission in the absence of evidence that DTC has been met.
Our Partners	89	WDBC has failed to satisfy the Duty to Co-operate and the need for cross-boundary strategies. The Council should have waited until publication of the commissioned cross-boundary study before publication.
Our Partners Para 2.2	150	Dartmoor National Park Authority request minor amendments to the paragraph to remove the words ‘board of the National Park’ and instead refer to the “Dartmoor National Park Authority”.
Paragraph 2.4	150	Dartmoor National Park Authority request that the reference to the Devon-wide protocol should refer to ‘Local Authorities’ and not ‘Councils’.
Larger than Local Issues	131	Relationship between authorities should be taken into account when setting OAN. Cross-boundary study won’t be published until later in 2015. Concerns that other adjoining authorities will be unable to meet their OAN which will have implications on WD. A Duty to Co-operate Statement should be prepared setting out the Council’s compliance with the legal requirements of DTC and outcomes of collaborative working.
Larger than Local Issues	150	Dartmoor National Park Authority suggest that given the discussions DNPA and WDBC has had, and will continue to have around development in the Borough Council plan area in the context of the National Park, that the conservation and special qualities of the National Park, and its setting, should be a larger than local issue.
Strategic Housing Requirements	150	Dartmoor National Park Authority welcome discussion to date and acknowledge need for further discussion through the Duty to Cooperate, involving Members if required. Consistent approach is needed to the two plan areas and agreement can be reached regarding cross-boundary housing numbers

Our Vision and objectives

Policy/Para/Section	Rep no.	Key Issue(s)
Our Vision and Objectives	47	Bere Ferrers Parish Council suggest adding the following to the third bullet of Our Infrastructure objectives <i>“..., with controls on HGV routes in rural areas”</i>
Our Heritage Objectives	91	Devon County Council support the broad objectives under S. 9 Our Environment (covers aspects of the historic environment) and S.10 Our Heritage and OP 45 also reflects broad range of heritage assets in the Borough and gives due weight to internationally designated assets as well as undesignated but locally significant historic sites and buildings.
Our Vision and Objectives	81	Highways England supports the vision and objectives and in particular support the requirement to provide appropriate infrastructure alongside development so that communities are supported by access to key services and facilities as well as improving provision and access to transport services.
Our Environment Objectives	103	Natural England welcomes the environmental objectives of the Plan.
Objectives, p.14	124	General support for objectives. Suggest add in “in appropriate and sustainable locations” after “range of housing”
Objectives	122	Okehampton Town Council considers the objectives to be aspirational and as such there is an agreement in principle. Specific comments on objectives set out below. It was noted that an Executive Summary would have aided accessibility.
Our Communities - Objectives	122	Okehampton Town Council consider that the focus of the third objective should be on employment rather than homes for the sake of housing numbers. The objective would therefore be better adjusted to <i>“To enable communities to have a safe, secure and healthy environment where homes employment is supported by employment homes, infrastructure...”</i> . Further, the figures quoted for the growth of jobs does not appear to justify the evidence for general housing need.
Our Homes - Objectives	122	Okehampton Town Council considers objective 1 is too general and would benefit from being tighter in expression to be meaningful.
Our Homes - Objectives	122	Okehampton Town Council considers objective 2 feel the statement could be strengthened and suggest <i>“To ensure that the current housing stock is healthy, safe, secure <u>and conforming to current building regulations</u>, supporting independent living and reducing fuel poverty.”</i>
Our Economy - Objectives	122	Okehampton Town Council notes that the emphasis appears to be focussed on new businesses, but there should also be support for existing business. Suggest amending objective 3 to <i>“To support <u>existing as well as new businesses</u> and promote the role of town centres by...”</i> .
Our Heritage - Objectives	122	Okehampton Town Council feels that Our Plan acknowledges the heritage assets but does not identify the employment opportunity associated with such assets. As such, recommend the inclusion of a second objective: <ul style="list-style-type: none"> <i>“To promote heritage tourism for employment opportunities.”</i>
Vision and Objectives	132	Considers there is scope for greater emphasis on the interdependency of the objectives. The statement in the vision <i>“...places where businesses can develop and grow”</i> seems to restrict the aim to private sector

	<p>organisations. Suggests there could be a better solution that could include public and third sector organisations.</p> <p>Welcome the intention to make a ‘positive contribution to the equality, fairness and spiritual wellbeing of our communities’ but is unclear on the difference between ‘equality’ and ‘fairness’ in this context and what ‘of our communities’ adds.</p> <p>Our Wellbeing objectives The ‘;’ suggests that only activities improve and promote. All the features listed should do this e.g. some forms of housing and employment damage wellbeing.</p> <p>Our Communities objectives Addresses the point above. Welcomes the specific inclusion of the future impact of actions.</p> <p>Our Homes objectives Welcomes the point about current housing stock but disappointed that there is no ambition for new homes to support other objectives e.g. through energy efficiency</p> <p>Our Economy objectives Would like to see encouragement of local purchasing/trading included</p> <p>Our Infrastructure objectives Would like to see specific mention of walking and cycling within transport.</p> <p>Our Environment objectives Support.</p> <p>Our Heritage objectives Agree but questions why this is not included as part of Our Infrastructure.</p> <p>Our Resources objectives Welcome the commitment to low carbon design and renewable energy but disappointed that “significant” is not expanded in the relevant section.</p>
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Our Wellbeing

Policy/Para/Section	Rep no.	Key Issue(s)
Our Wellbeing Para 4.8	44	Considers this paragraph can be strengthened by adding a statement that developing a 'sense of place' is an important part of any development and contributes to the wellbeing of residents.
Our Wellbeing	91	Devon County Council note that the themes and objectives are fine in broad terms but do not dovetail with the priorities set out in the Devon Joint Health and Wellbeing Strategy which is adopted by DCC and the Health and Wellbeing Board.
Our Wellbeing	104	Considers that the phrase "reducing health inequalities" is inappropriate in that the emphasis should be on raising/improving the relevant factors rather than simply evening out the inequalities.
Our Wellbeing Para 4.8	157	This is unsound supporting text as it does not demonstrate the underlying aims of framework. All three dimensions of sustainable development – economic, social and environmental have a direct influence on health and wellbeing. This point should be clarified.
OP1	42	The respondent suggests inserting the following wording into criteria (c) " <i>Promoting walking and cycling by improving existing infrastructure or providing <u>continuous, convenient and safe</u> new walking and cycling links</i> ".
OP1	44	Suggests there should be reference to a Design Guide in OP1 and there should also be a reference to the density of new development. The importance of a 'sense of place' should also be included. Considers criteria (j) is not in the gift of WDBC to deliver.
OP1 Wellbeing and SA/SEA – Our Well being – Population & Human Health SA5 &	72	Devon and Cornwall Police Authority questions whether development improves a number of factors around well being, and these include <ul style="list-style-type: none"> Promote a safe environment, through designing out <u>opportunities</u> for crime and the fear of crime, <u>antisocial behaviour and conflict could occur</u> Seek to include text in red and point out there is no further mention of designing out opportunities for crime, fear of crime, antisocial behaviour and conflict which can have an impact on Wellbeing. Recommended this is included in OP1: Wellbeing. Within this section also refer to the role of the Police Architectural Liaison Officer
OP1 & OP43	83	Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy. Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a developer's checklist has been completed and can be accessed via http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/

		<p>Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness.</p> <p>Sport England would encourage new development be designed in line with the Active Design principles to secure sustainable design.</p>
OP1	89	This policy is too ambiguous, particularly as regards housing delivery
OP1	91	Devon County Council suggests this policy could usefully include reference to supporting development which contributes appropriately to education and other community facilities/services (e.g. children's centres). This links to a number of objectives in the Marmot review.
OP1	103	We welcome the recognition that Green Infrastructure makes to improved wellbeing. This should include natural green space as well as formal spaces.
OP1	104	'reducing health inequalities' is inappropriate in that the emphasis should be on raising/improving the relevant factors rather than simply evening out the inequalities.
OP1	104	Feels that criteria (f) and (k) requires clarification. Criteria (o) should state 'need' rather than 'use' of the private car. (p) covers two distinct and unrelated issues – health and wellbeing and crime and as such should be specified separately. (r) requires clarification.
OP1	124	Support general thrust of policy but consider its intention is insufficiently positive and clear. Suggest amendments as follows: <i>"The Council will support new development <u>that demonstrates that it contributes to reducing health inequalities by:...</u>"</i> Add final sentence <i>"<u>Conversely, the Council will resist development that does not demonstrate the above.</u>"</i>
OP1	132	Support particularly criteria (b) (c) (d) and (f). Suggest clause (c) should say 'and' and not 'or'. Clause (j) – increasing average income is vague and suggest this could be done by importing wealthy pensioners which may not be the intention.
OP1	164 LATE	The Environment Agency supports this policy.

Our Communities

Policy/Para/Section	Rep no.	Key Issue(s)
OP2 (Sustainable Development)	37	Milton Abbot Grouped Parish Council accepts that 'sustainable' development is an essential and desirable aim and there is no uniform test for sustainability. The PC acknowledge the efforts of the Borough Council to adopt a tiered approach to what constitutes an appropriate level of development in communities outside of the main towns and local centres.
OP2	37	Milton Abbot Grouped Parish Council considers the wording of OP2 suggests a "fast track" approach to approving applications. If this is the case, the process should be made clear. If there is no separate process then the third paragraph is unnecessary and misleading as there should be no unavoidable day in the consideration of any planning application, whether sustainable or not.
OP2	44	Questions what the NPPF definition of sustainable development is. Suggests adding to the opening sentence on page 21 <i>"For the purposes of clarity, in this document, 'sustainable development' is defined as indicated below in points (a) to (s)."</i> There needs to be a definition provided to clarify the 3 rd para of OP2 about what constitutes a material consideration. Clause (i) – add in the word 'appropriate' in front of 'renewable resources' Clause (n) – add the words 'identified as a need' in front of 'all types of housing'. Clause (o) – this is not deliverable by WDBC
OP2	47	Bere Ferrers Parish Council suggest adding reference to the World Heritage Site in clause (g).
OP2	72	Devon and Cornwall Police Authority suggest adding text in red to 'improves health and well being by encouraging healthy lifestyles and environments which are free from crime, the fear of crime, <u>antisocial behaviour and conflict</u> ' Reducing opportunities for antisocial behaviour and conflict through the design process has a significant impact on creating sustainable and cohesive communities. Poor design can lead to run down town centres and poor quality housing where crime and antisocial behaviour reduce the sustainability of communities which can become problem areas and experience conflict.
OP2	81	Highways England supports the measures of the policy which seek to minimise the use of the private car where appropriate, and importantly providing the necessary infrastructure requirements to serve development so that it does not negatively impact on the surrounding area, taking account of the cumulative impact of development. HE assume that this also applies to the SRN.
OP2	82	Criteria d) does not comply with NPPF, now no preference towards use of previously developed land, instead should be a cost-benefit approach. Quote a judgement and decision. Suggest should be reworded to encourage re-use of brownfield sites rather than favour.
OP2	90	Criteria (s) should be deleted as NP's can be used by locals to frustrate development.
OP2 & OP45	91	Devon County Council suggest that to better achieve sustainable development, it is recommended that there should be

		<p>cross referencing of OP45 to other areas of Our Plan</p> <ul style="list-style-type: none"> • Refer to WHS in 'Our Nationally Important Landscapes' (S. 9.5 – 9.10) & OP37 as it is a landscape designation with a countryside and natural environment component (landscape character, geodiversity, mine-related flora) • 'Our Green Infrastructure' (s.9.16 – 9.16) refer to cultural heritage and build in how GI can support a positive strategy for objectives for the historic environment.
OP2	103	<p>Natural England advise that this policy could be improved by the inclusion of the following where these are not included in policy elsewhere in the plan.</p> <p>Criteria (d) should recognise that previously developed land can be of environmental value.</p> <p>Criteria (e) should include</p> <ul style="list-style-type: none"> - Habitats as well as species including irreplaceable habitats such as ancient woodland. - Geodiversity sites including those associated with the World Heritage Site. - Wildlife corridors, stepping stones and important hedgerows. - Undesignated sites including County Wildlife Sites <p>Notwithstanding criteria (e), criteria (g) should also include Sites of Special Scientific Interest as the NPPF states that development likely to have an adverse effect on these should normally be refused.</p> <p>Suggest criteria (i) could be improved by the addition of wording to protect public access to significant greenspace.</p>
OP2	104	<p>Clauses f, k and r require clarification. Clause o should state 'need' rather than 'use' of the private car. Clause p covers two distinct and unrelated issues - health & wellbeing and crime. These should be specified separately.</p>
OP2	124	<p>Support the principles behind the policy but questions whether 4th para fully accords with the NPPF in so much as the presumption in favour of sustainable development is absolute and not to be weighed in the balance against other factors as OP2 suggests.</p> <p>Suggest policy should be re-worded as follows:</p> <p><i>“Our Plan will take a positive approach that <u>applies</u> the presumption in favour of sustainable development contained in the National Planning Policy Framework. Planning applications for <u>sustainable development</u> that accord...”</i></p> <p><i>“<u>The Council</u> will work with applicants and stakeholders....approved wherever possible, and to secure <u>sustainable development</u> that <u>performs</u> the economic, social and environmental <u>roles set out in the NPPF.</u>”</i></p> <p><i>“The Council will support development that make a positive contribution to sustainable development <u>and will take the following factors into account:</u>”</i></p>
OP2	132	<p>Support the policy assuming that the criteria are not in priority order, particularly clauses (e) (h) (i) (l) (o) and (p).</p>
OP2	150	<p>Dartmoor National Park Authority suggest that criteria (g) should refer to <i>“the great weight given to <u>the conservation of AONBs, National Parks...</u>”</i>.</p>
OP2 &	153	<p>Historic England encourages a holistic approach to sustainable development and encourage heritage issues are reflected in</p>

General approach		all facets of the plan. HE are unsure that all site allocations are informed by a positive and proactive response to the historic environment and there is a lack of any real evidence base that assesses the impact of development proposals and sites on the historic environment. Suggestions below are made to help achieve a sound plan.
OP2	164 LATE	The Environment Agency support this policy and note that for development to be sustainable, criteria (q) may need to include flood defence and drainage (both foul and surface water) infrastructure.
Meeting our Future Development Needs Para 5.15	91	Devon County Council suggest that the relationship between WDBC and the wider Plymouth Housing Market Area should be recognised. The West Devon housing number sits within the context and is related to the wider HMA.
Para 5.16 & 5.17	89	Objections to para 5.16, 5.17 and OAN, particularly how figure is assessed and discounting of job led projections. Council's preferred evidence and approach has led to inadequate provision being made. Failure to significantly boost supply.
OP3 (Meeting our Future Development Needs)	75	The respondent considers that OP3 is unsound. Issues: <ol style="list-style-type: none"> 1. Demographic trend based projections underestimate housing need 2. Projections should align to highest rates set out in SHMNA, which are employment led assessments providing objective evidence that housing requirement needs to be increased to meet economic growth and disregarding these reinforces recession lower growth rates. Approach contrary to NPPF guidance to plan positively to meet sustainable economic growth, should plan for more positive growth and higher housing projection 3. Significant increase in allocated housing supply required to bridge affordable housing gap and plan positively for mixed housing provision to meet need 4. Non implementation of a rate of 15% from sites with planning permission overestimates provision from this source 5. Over-reliance on windfall and a shortfall in allocated sites results in vulnerable 5 year housing land supply As a result of above points consider there is a need for additional allocations to meet need.
OP3	82	Assessment of OAN does not include latest demographic projections. Quotes figure of 284 from these. Target also does not boost supply or provide "aspirational but realistic planning" and will constrain growth. There has been insufficient regard to affordability problems and potential economic growth.
OP3	88	The target is too low to meet OAN. Does not take into account whether a higher housing target is required to meet DNPA OAN. Should not have dismissed employment led scenarios when assessing OAN and does not significantly boost housing supply. SA should be updated to fully appraise the sustainability to alternative approaches to housing delivery and housing scenarios. Target does not meet net annual affordable housing need of 140 per annum. SHMNA and topic paper fail to consider whether plan should meet OAN in full for affordable housing. Suggests starting point for OAN should be 290.
OP3	90	Concerns that plan will not meet future needs and targets are too low, OAN should be reconsidered or at least altered to state "at least" 216 homes per year.... to make it clear that this is a starting point not a "ceiling" figure.
OP3	97	Do not believe SHMNA robust (previous representations) but even so OAN figure does not accord with SHMNA figure of between 268 and 453 dwellings, including 199 affordable. Target is too low, does not significantly boost housing supply. Topic Paper whilst seeking to use more up to date projections is not an adequate evidence base and does not cover HMA area. New or significantly updated robust SHMNA is required. Affordable housing need is not adequately considered as

		NPPF states that Local Plan must meet the needs for market and “affordable” housing.
OP3	99	The respondent notes that the increase in jobs does not take into account failure of SME’s and home businesses or availability of expertise.
OP3	128	Proposed level of housing will not deliver a significant proportion of housing need, it is suggested that the Council should consider an increase to its housing target to help deliver its affordable housing need.
OP3	131	Don’t agree that OAN should be based solely on demographic trend-based projections. A figure of 264 homes per annum is required from 2012 household projections. Furthermore this are just a starting point and should be adjusted upwards to meet real need. Total affordable housing need should be considered and an estimate made of those without their own homes or living in unsuitable accommodation. Conclusion that housing target is too low. Council should re-consider its OAN.
OP3	138	The housing requirement should be based on one of the employment led scenarios in the SHMNA, target will not significantly boost supply as lower than previous annual target. Suggest WDBC should review its approach and base housing requirement on one of the higher employment-led models and Tavistock is the logical place to accommodate additional growth.
OP3	144	Final line of policy is not sound and contradicts the NPPF aims of promoting sustainable development as it will restrict growth being overly protective and not justified or positive, contrary to paragraph 14 of NPPF and inconsistent with paragraphs 19 and 21 with emphasis to support economic growth and not over-burden investment. No consideration is given to the viability of existing community facility nor whether it is economically sustainable. Would like last line removed.
OP3	147	The Council is not seeking to significantly boost its supply of housing and is relying too heavily on Plymouth, which is constrained on all sides and indeed West Devon should take some of the pressure off Plymouth.
OP3	157	Housing target should state “at least” 216 homes per year to allow for flexibility. Insufficient consideration of the link between homes and jobs although accepts rationale not to uplift provided that in-migration provides sufficiently skilled workforce and does not promote unsustainable out-commuting.
Para 5.23	47	Bere Ferrers Parish Council question whether the reinstatement date for the railway is correct as dialogue with DCC suggested it will be open in 2021.
Distributing Development throughout the Borough Para 5.24	91	Devon County Council suggest amendment to the wording of the paragraph as follows: <i>“...in the east of the town, aiding delivery of helping to deliver the aspiration for daily regular-passenger services between the town and Exeter using the existing railway line.”</i>
Settlement Classification Para 5.29	156	Transition Tavistock and SW Devon Community Energy Partnership considers that the lack of inclusion of population centres which are part of DNPA in the listing of local centres does not make sense. Suggest the WDBC and DNPA need to come together to ensure that Our Plan is inclusive rather than a misleading representation of the Borough. Consider this is a weakness of the plan.
OP4 (Borough Wide Development Strategy)	41	The maximum numbers suggested for medium and small scale developments ie up to 100 in main villages and 15 in small villages are too high an would not be easily accommodated into existing settlements. Also question the use of 15 homes as the lower end of the scale. Question whether it relates to just allocations.
OP4	44	Suggest adding the word ‘only’ before ‘...be supported in exceptional circumstances’

OP4	81	Highways England supports the strategy to support development across the Borough where it is appropriate for the role and function of the settlement. The HA agree with the spatial distribution of development.
OP4	88	Artificial range of housing numbers 15-100 should be removed re small to medium scale development to have regard to NPPF and Local Centres and Main Villages should be separated out to make it clearer that Local Centres are the most sustainable locations to meet rural development needs.
OP4	97	The last paragraph, concern over use of word “exceptional” – state this refers to the exceptional circumstances test in the Green Belt which doesn’t apply in WD and is inappropriate and will restrict growth.
OP4	103	<p>Natural England support the policy wording which states that the majority of new development will be focussed in the Main Towns. This policy is linked to the table with paragraph 5.29 which designates Bere Alston as a local centre and Buckland Monachorum and Crapstone as main villages. This has consequences for the remainder of the policy.</p> <p>Given the further Table 2 accompanying OP5 regarding minimum development and policy OP19, it is clear that this policy is not sufficiently clear and could be open to interpretation that is not in accordance with the NPPF nor other Plan policies.</p> <p>Whilst 15 houses may be appropriate in some villages, that number could be significant in other more sensitive settlements. NE Advise that attributing a scale of development in smaller settlements should be supported by a robust evidence base or removed.</p> <p>Therefore, the present policy is imprecise to be effective and is not sound. It could be made sound by specifying wording in regard to development within or in the setting of protected landscapes, which is in accordance with the NPPF.</p>
OP4	124	<p>Supports the principle of the policy.</p> <p>Questions how 100 homes can be considered ‘medium scale’ development. The level appears out of scale for smaller villages and implies encouragement for even greater scales of development in the main towns.</p> <p>Suggest the plan could usefully take on the definition of ‘major development’ set out in the 2010 Development Management Order. Small in the context of Our Plan should be defined as less than Question whether the “medium” definition is needed and instead OP4 could:</p> <ul style="list-style-type: none"> • Encourage the majority of development (of all scales) in the Main Towns on sites identified in Our Plan; • In Local Centres and Main Villages encourage development on sites of appropriate scale identified in Our Plan, SPDs or Neighbourhood Plans; • In smaller villages, permit, exceptionally, development of up to 10 dwellings along the lines set out in OP4.
OP4	124	This would result in a strategy based on a range of sites that provide the flexibility to achieve a rolling 5 year supply of land.
OP4 Table 1	124	<p>Table 1 assumes that the Housing Demand/Supply equation should be reset to zero in 2011. If there has been a shortfall in previous years, this should be carried forward and appear in Table 1. Likewise, if there has been a surplus prior to 2011, this should also be factored in to the table.</p> <p>Support the inclusion of windfalls but questions why there is a need to distinguish between “windfall” and “other unplanned</p>

		development”.
OP4	128	OP4, 5.31 and 5.32 – most development should be concentrated in Tavistock and Okehampton and references to not simply focusing on larger settlements and stating that it is too simplistic to identify suitable locations for development on the basis of physical presence of facilities and infrastructure.
Table 1	128	Figures in table 1 do not match the Development Strategy topic paper para. 2.40
OP4 and OP32	141	Consider that more emphasis should be given to the scale and size of housing developments and infrastructure requirements within the context of existing villages and towns that make up the character of West Devon. Respondent wishes to reiterate that building large housing developments in small market towns with few employment opportunities is the way forward. Large scale housing development above and beyond that set in the Core Strategy cannot be sustained until there is a balance of meeting other considerations (environment, infrastructure, heritage etc). There is concern at new development has to be realised outside of the settlement boundary (e.g. Brook Farm).
OP4	157	This policy is too prescriptive re smaller scale development re 15 unit upper limit and equally larger settlements would benefit from smaller infill plots. Supporting text unclear as to what classification settlements fall into – table could be provided
Our Communities	80	Notes that the SHMNA formula for calculating the number of new homes required is at odds with the annual new job requirement. However in Okehampton there is an expectation that new homes will be built year on year which far outstrips the job increase. This cannot be described as sustainable. Also raises concerns that job prospects in rural towns such as Okehampton will not command a sufficiently high enough salary that will enable younger people to buy a home. Concerned at the wording of the affordable housing requirement of ‘up to 30%’ and feels this is a get out clause for developers. Questions why a minimum figure was not included.
OP4	163 LATE	The respondent is concerned by the continuing expansion of Tavistock and suggests focusing more development in Okehampton to help both regenerate this community and support the Exeter economy and distributing planned homes more widely so as to sustain smaller communities whose infrastructure (schools, doctors and local shops) are in jeopardy unless there is further growth; creation of a new community/town in a location that is of less scenic value. Objects to options 5, 6 and 7 set out in the Dec/January consultation for development in Tavistock on the basis of the landscape constraints and AONB designation. Considers that Whitchurch is a separate community with a distinctive village character and as such a clear separation with Tavistock is required to maintain the integrity of the village. Also notes that the road infrastructure is not capable of accommodating further development. Suggests that any future development in Tavistock is focused in the north west and north east of the town.
OP5 (Minimum Planned Requirements)	37	Milton Abbot Grouped PC consider the minimum planned requirement for Milton Abbot for 20 dwellings does not achieve the right balance between making the necessary contribution to local housing needs and meeting criteria (a) and (b) of OP3, given the lack of local facilities in Milton Abbot, the size of the village and the impact that 20 new homes would have on the historic setting of the village. The Parish Council therefore suggests OP5 is amended to set a minimum target of 15 houses

		in Milton Abbot.
OP5	47	Bere Ferrers Parish Council is concerned that the windfall allowance won't be realised and result in a considerable increase for towns and parishes. Consider this allowance should be allocated for the 15 year period and take into consideration OP4.
OP5	56	Hatherleigh Town Council strongly objects to 35 new homes in the town. The Town Council notes its status as a local centre but questions how further development can be considered sustainable when the topography of the town and flood zones limit development opportunity, the proximity to Hatherleigh Moor and the small town centre within a Conservation Area. Future development is therefore likely beyond the edges of town and new residents will likely be car dependent due to the distance from the town centre and ability to access its services and facilities. Further concerns about parking provision in the town centre.
OP5	62	Exbourne PC accepts that some development has to take place but would prefer smaller schemes that form natural infill and blend in with the Village. There are concerns around narrow streets, infrastructure, employment opportunities and rural isolation and deprivation
OP5	81	Highways England do not wish to comment on the development requirements of the Borough but note that the majority of development is already committed. That said, there is development planned in locations and/or at levels that could potentially adversely affect the operation of the A30, namely Okehampton, Tavistock and Lifton based on the levels set out in Table 2. HE note that it is important that the impact of development on the SRN is considered.
OP5	82	Do not consider application of a phased approach to identifying sites as sound and if applied rigorously risks ensuring that housing needs are met in full, Policy too reactive. Table 2 should be deleted or expressed as indicative.
OP5	88	Minimum level of housing based on arbitrary ceiling on development in Local Centres. Comments that Lifton is capable of supporting higher growth. Welcomes NP designation but NP should not be subject to any "justifiable reason" exception to preclude delivery of development within first 5 years. Also wants Land at North Road included as an allocation in Our Plan.
OP5	89	The Council has failed to identify sufficient sites, table 2 is flawed, some smaller commitments are part of windfall target and there is an over-reliance on windfall.
OP5	90	<p>The policy should state "<i>at least</i>" the minimum planned requirements. Plan must allow flexibility to allow sensible and sustainable schemes to come forward straightaway so as not to artificially hold back housing delivery. Concerns that identified existing commitments in North Tawton will actually be delivered coupled with proportionally low numbers assigned for 6-20 year period will result in needs not being met. The plan should identify specific sites for 6 years plus to comply with paragraph 47, bullet point 3 of NPPF, this has only been done for Tavistock. Concerns that waiting for NPs and delaying allocations could hold back housing delivery to meet needs. Sites should be allocated for North Tawton, including a site at Devonshire Gardens, have expert advice that despite concerns raised by LAA panel a modest development is achievable. Higher numbers should also be allocated to Local Centres than have been to help support regeneration, and distribution revised - North Tawton should have a higher figure than Lifton which is smaller. Wording changed proposed for OP5, first sentence 1.50</p> <p><i>"In Main Towns, Local Centres and Main Villages, at least the minimum planned requirements will be delivered on allocated sites identified in Our Plan, a future Allocations Development Plan Document (DPD) and/or on previously developed land that is physically well related to the nearest settlement and where the development is appropriate in scale for the role and function of that settlement."</i></p>
OP5	91	Devon County Council suggest the use of the Allocations DPD could usefully be clarified in its context with the Local Plan

		and Neighbourhood Plans.
OP5	99	The respondent considers that development in Exbourne is not needed, there is no demand from local people, ageing population will release homes, insufficient employment, potential flooding, heritage and habitats. None of these issues recognised in Our Plan. Any Neighbourhood Plan needs to explore and recognise these aspects and cultural heritage.
OP5	103	<p>Natural England advise that the policy and Table 2 is not yet justified, particularly with regard to development in or in the setting of Protected Landscapes. It is also noted that these are <i>minimum</i> planned requirements whereas the landscape assessment has stated that these should be regarded as maximum numbers.</p> <p>Development in towns, local centres and main villages within protected landscapes needs to be shown as deliverable. For example, the evidence base so far presented shows the development of 60 homes in Bere Alston may be difficult to deliver having regard to the LAA and the Landscape Appraisal of proposed development in the AONB.</p> <p>Further, given the significant allocations in Okehampton, an additional 250 homes may be difficult to allocate without harm to significant landscape assets including the National Park.</p> <p>Therefore, Natural England consider the risk to delivery of the Spatial Distribution is high and that evidence is needed to show how it will all be deliverable through Neighbourhood Planning. It is suggested that further landscape assessment evidence is needed for other main villages within or in the setting of Protected Landscapes.</p>
OP5	132	Pleased to see criteria (d) as a mandatory requirement but questions whether there is a clear test of what it means?
OP5	124	Considers table 2 is unnecessarily confusing and there is no need to distinguish between existing and planned development. Phasing is uncertain and is not strictly necessary. Suggest it would be better to allocate a level of development to a settlement and to manage development so as to achieve a 5 year supply of deliverable land.
OP5	128	It is not clear how the Council has arrived at the minimum planned requirements for each settlement. Not set out in Development Strategy topic paper.
OP5	128	Windfall should not been included and deducting this leaves the Council with a housing shortfall of 1,767 dwellings. The Council does not provide compelling evidence that this will continue to provide a reliable source of supply, especially as rates have fallen since 2011. NPPF should not just rely on historic rates but also expected trends and have regard to the LAA, this is not fully explained in the 5 year land supply document.
OP5	137	<p>Small developments of smaller homes in Exbourne would support local facilities, homes need to be of high quality design. Substantial development not appropriate due to traffic and other infrastructure.</p> <p>The capacity of Exbourne school should not be a constraint as currently a high proportion of pupils come from outside and spaces should be allocated to local children in preference.</p> <p>Representation goes on to make comments on land brought forward in the SHLAA.</p> <p>Land already with planning permission north of Exbourne Cross Garage not identified in the LAA.</p>
OP5, OP6 and OP7	137	The Okehampton area has seen an unprecedented amount of development which has caused traffic problems, increased crime and increased social deprivation arising largely from lack of employment opportunities

OP5	138	The conditions applied are too restrictive and will not allow sufficient flexibility to react to changing or unforeseen circumstances. Some of the criteria are ambiguous and could lead to delays, criteria b in particular.
OP5	147	Given the acceptance in the plan that there is a shortfall of 150 homes in Okehampton the Council should consider allocation of more sustainable sites put forward in the LAA to the South of Exeter Road.
OP5	154	Lifton Parish Council wish to note that the 11 dwellings mentioned as 'existing commitments' refers to land on which outline permission has lapsed. Also question the phasing of the development and whether the early phase will bear a disproportionately high percentage of the infrastructure costs which could deter potential developers.
OP5	157	Lack of inclusion of rural locations within policy when a 5 year land supply shortfall occurs as these have the potential to meet undersupply. Para 54 of NPPF supports this. Wish to ensure sites brought forward for Milton Abbot and assessed as suitable in LAA are included in any emerging site allocations documents.
Existing Allocations Para 5.37	138	5.37 – states which allocations will be saved or replaced but nothing about which other policies from the adopted Core Strategy are to be saved
Existing Allocations Para 5.37	142	The Agent acting for some of the landowners of H3 Wonnacotts thinks site should continue to be allocated notwithstanding difficulties and delays experienced
OP6 para 5.42 (East of Okehampton Strategic Employment Site)	81	Highways England are concerned with the text in paragraph 5.42 which encourages businesses which ' <i>require and/or generate significant lorry/HGV movements</i> ' as this is likely to significantly impact on the junctions of the A30. It appears that this statement is not based on anything other than its proximity to the SRN.
OP6 & OP7	81	Highways England still has concerns about the impact of these developments on the A30 due to their location. New development should provide the additional infrastructure made necessary by the development if there is an adverse impact on the operation of the SRN. The HE will require a robust transport evidence base and mitigation proposals in order to comment further.
OP6 & OP7	94	Concerns at the level of development taking place in the town and a lack of meaningful provision to the local community or vision of sustainability and what is best for the town. Strongly objects to all future development work in Okehampton until the Neighbourhood Planning Committee has been formed and consulted.

		<p>Considers that the principle of sustainable infrastructure has been neglected by WDBC.</p> <p>Considers consultation events are advertised poorly and are unsatisfactory and not a sufficient or adequate form of liaison.</p> <p>Feels the views of the people of Okehampton have not been taken into account.</p>
OP6	91	Devon County Council suggests that criteria (c) should state that there will be a pedestrian/cycle link between the site and Hameldown Road across the railway, rather than a vehicle link.
OP6 & Para 5.42	91	Devon County Council are keen to discuss coach parking facilities mentioned in the paragraph to understand if this is an aspiration and how funding/maintenance will be secured.
OP6	140	The inclusion of 30% for other uses seems to be arbitrary and potentially over-prescriptive and should not be included. Proposals should be justified on their merits.
OP6	145	This allocation should not be treated as a housing allocation as only supports provision of housing to facilitate employment uses. A number of high profile enquiries received by DCC for employment uses on site suggesting a need for employment land and with no other sites provided would create a shortfall in provision. Premature to suggest housing is required to enable employment uses.
5.46	91	Devon County Council notes that the date of the Masterplan is incorrect and should be 2014.
OP6 – OP17 and Proposals Map	164 LATE	<p>The Environment Agency does not raise any particular environmental issues for the proposed allocations (OP6 – OP17). However, there are some sites where land contamination may be an issue (e.g. sites with previous commercial uses) and some sites which are constrained by fluvial and surface water flood risks.</p> <p>It would therefore be useful for the Proposals Map to include information from the Flood Map to make sure it is clearer which sites are constrained by flood risk.</p>
OP7 (East of Okehampton Strategic Housing Site)	52	Supports the inclusion of Parcel 4 as set out in the adopted East of Okehampton Masterplan SPD. Before any further building takes place, the link road should be completed.
OP7	81	Highways England note that criteria (q) includes reference to strategic transport requirements but the wording would suggest this does not relate to the SRN.
OP7 and OP9	82	The plan needs to be flexible to enable full housing needs to be met and take into account delays in delivery and the Council should seek to identify further sites to ensure a rolling 5 year supply. Does consider approach to reduce capacity on strategic sites and re-distribute elsewhere addresses this in part.
OP7	91	<p>Devon County Council make a number of comments on different criteria as follows:</p> <p>Criteria (c) should also recognise that DCC have provided forward funding to secure a primary school site in the expectation of proportionate reimbursement from developers.</p>

		<p>Criteria (k) – permeable access within the allocation as well as to the rest of town would be supported.</p> <p>With regards to criteria (m) it is noted that GI could also offer pedestrian/cycle benefits.</p> <p>Criteria (q) – it would be clearer to state that development should contribute (rather than deliver) the town centre access road.</p>
OP7	91	<p>Devon County Council suggests that OP45 needs to be applied more clearly to OP7 as follows: There should be a specific reference in paragraphs 5.45 – 5.48 and OP 7 to the Scheduled Ancient Monument fort, its setting and the undesignated but significant Roman Road within the allocation area to help deliver appropriate development within the heritage context. It refers to integration and mitigation in respect of the natural environment and should do the same for the historic environment.</p>
OP7 & OP9	91	<p>Devon County Council suggests that the content of OP45 needs to be applied more clearly to 2 specific major developments OP7 & OP9 Part (h)</p>
OP7 (m)	91	<p>Devon County Council suggest that the Roman Fort and Roman Road should be incorporated into GI network referred to in OP7 (m)</p>
OP7	145	<p>The removal of parcel 4 from previous SP22A strategic allocation. Absence of supporting evidence to substantiate de-allocation and there is an existing adopted masterplan that includes provision for 150 dwellings on this parcel. Will also not realise full range of community and site wide benefits associated with overall development of the eastern extension.</p> <p>No suitable alternative site has therefore been identified to replace parcel 4 leaving proposed housing allocation in Okehampton deficient by around 300 dwellings. Lack of evidence that other sites brought forward in the LAA are deliverable and no Neighbourhood Plan area yet approved, all leading to vulnerability around land supply.</p>
OP7	151	<p>Devon Archaeological Society suggests that there should be reference to integrating development with statutorily designated Roman Fort and its setting, Roman road and associated archaeology rather than just the natural environment.</p>
OP7	153	<p>Historic England considers this policy is unsound. Lack of reference to scheduled Roman Fort and its setting. Need evidence to provide clear understanding of its significance so that any proposals avoid or minimise harm and this should inform design options (PPG para 019) looking for more sensitive solutions which deliver public benefits. These should be applied to the site to consider if it is appropriate for development and if so set out clearly how the scheduled monument and its setting might be safeguarded. Supports a design led approach and a policy which sets out ways to mitigate against harm. The masterplan gives little thought to designated assets and fails to guide developers. Design principles should refer to need to safeguard character and setting of this building. Recommends additional development guidance: “(s) An archaeological evaluation will be required” “(t) Development proposals should safeguard the character and setting of this scheduled monument.”</p>
OP7	164 LATE	<p>The Environment Agency notes the flood risk constraints in the Stockley Valley which bounds the eastern edge of the site as well as drainage issues elsewhere on site. The EA support the site specific development principles regarding the provision</p>

		of multifunctional strategic green infrastructure, and a sustainable water strategy.
OP8 (Area of Employment Opportunity – Land at Plymouth Road, Tavistock)	81	Highways England has no objection in principle to other uses being acceptable where they enable the delivery of serviced employment land. A robust transport evidence base will be required to support any application and mitigation proposals implemented as necessary to ensure there is no adverse impact on the SRN. Mixed use development is encouraged to reduce the need to travel by private car.
OP8	91	Devon County Council suggest criteria (d) is amended to: <i>“Support and Do not prejudice the delivery of a road or highway...”</i>
OP8	115	SP23B/OP8 Boundaries should not be extended. This representation relates to two references. A – The S and SW of Tavistock Masterplan B – Considering Sites for Development in Tavistock Parish Site Information Pack – Dec 2014 The representation sets out that the boundaries of OP8 should not be extended to include land put forward through the LAA process.
OP8	124	This policy is generally acceptable but suggest it would be helpful if “higher value enabling uses” was defined. In addition, criterion (f) does not appear to be based on evidence.
OP8	138	Not clear how policies will deliver previously planned infrastructure i.e. in OP8 no recognition that contributions required for rail re-instatement.
OP8 & OP9	84	The Core Strategy decided against dispersing development around the town in favour of Callington Road proposal. Now in the Our Plan land has been proposed at Brook Farm, Mount Kelly and New Launceston Road. Where will it all end? Will there be enough employment suitable infrastructure in place to support the new housing. Can increased traffic going to Plymouth be accommodated? A major concern is the way in which plans can altered for example Callington Road was allocated for 750 but can only deliver 635 and therefore the shortfall in housing needs to be accommodated elsewhere in Tavistock. OP8 is now suggested to accommodate 115 dwellings to make up for the shortfall. This could have impacts on the AONB, DNP and increase traffic on A386
OP9 (Land at Callington Road Strategic Housing Site) Consultation arrangements	28	Concerned that due to the presentation of the maps on the exhibition boards the respondent was unable to make an informed assessment of the proposal. Preferred approach would be to see development dispersed across the villages and using local builders. Considers the development of OP9 is too big and too localised and will significantly intrude on the hill/skyline whereas Tavistock currently lies unobtrusively in a valley. It is not a reasonable trade off for a railway link.
OP9	75	Further detail should be added as regards infrastructure requirements, in particular clarity on how the proposed development will deliver the re-instatement of the railway.

OP9	81	Highways England continues to have issues with the development of the site given the revised wording and the potential for impacts on the SRN that development may have without any form of mitigation. However, HE do support the principles of the policy to increase travel choices for people to reduce reliance on the private car.
OP9	91	Devon County Council make a number of comments on different criteria as follows: Criteria (k) – permeable access within the allocation as well as to the rest of town would be supported. With regards to criteria (m) it is noted that GI could also offer pedestrian/cycle benefits. Criteria (r) – suggest the text is amended to: <i>“The development should support and not prejudice the delivery of a road or highway....”</i>
OP9	103	Natural England note that this allocation was brought forward from the previous local plan. As that plan was pre-NPPF, Natural England feel it is appropriate to consider whether the policy for this allocation is in line with the NPPF. The wording in relation to the AONB is not considered to be sufficiently robust and compliant with the NPPF. Natural England advise that the policy should state that the development must <i>“must conserve the landscape and scenic beauty”</i> of the Tamar Valley AONB. Additional evidence is required at the project stage to show that this will be the case.
OP9	138	Object to reduction in likely housing yield to 635 dwellings. There is evidence to support yield remaining at 750
OP9	151	Devon Archaeological Society feel there is a need to protect international designations (Tamar Valley AONB), WHS, DNP) with more than have ‘regard for’ the historic environment. Need protection, enhancement and maximisation of opportunities for access, enjoyment and interpretation (as NPPF states).
OP9	153	Historic England considers this policy is unsound. Previous HE comments on masterplan do not appear to have been taken into account and has limited reference to heritage, and does not identify how the significance of the heritage assets should inform the detailed design coding and layout. The masterplan does little more than highlight access to the WHS and how applications demonstrate impacts on various heritage assets. Given reference to WHS Management plan and consultation with appropriate heritage expertise, surprising SPD does not contain more specific reference to WHS and how its setting, and that of CA, have informed proposed layout. Need evidence on significance of key designated heritage assets to help provide clarity about what is expected in development of site. Debatable if SPD conforms with NPPF or extant Core Strategy policy. Lack of evidence indicating an understanding of heritage and its setting to inform appropriateness of site for development and design options.
OP9	164 LATE	The Environment Agency support the site specific development principles for OP9 regarding the provision of multifunctional strategic green infrastructure, and a sustainable water strategy.
Para 5.68 – 5.70	124	If New Launceston Road is suitable and the Council considers there is reasonable chance that the site is needed in order to maintain a 5 year supply then it is appropriate to allocate it. It is not included as a reserve site. Considers there is no need for a narrative of the site options to be included within the plan and should be more appropriately set out in the evidence base.
OP11 (Area of	47	Bere Ferrers Parish Council suggest there could be scope within policy OP11 to investigate installation of cycle track/pedestrian way now subject to preliminary discussions at County and local level.

Employment Opportunity – The Station, Bere Alston)		
OP11 Sustainability Appraisal	130	Employment allocation at The Station, Bere Alston is unsustainable and scope inappropriately broadened. West Devon ELR did not support the site and the site has not been properly evaluated in the SA with the HRA assertion that the existing allocation is being carried forward misleading due the change in scope.
OP12 (Area of Employment Opportunity – Hatchmoor, Hatherleigh)	56	Hatherleigh Town Council understands the ownership of this land has changed and seeks clarification regarding its inclusion in the plan.
OP13 (Mixed Use Regeneration Site, Hatherleigh Market)	99	The respondent notes that the use of the Hatherleigh market site for much needed parking would be productive. Also raises concerns that the town should not become an urban conurbation and development causing drainage issues.
OP13	153	Historic England consider this policy is unsound. Development guidelines do not sufficiently safeguard the Conservation Area and listed building as is required in the 1990 Act (add title) by 'special regard'. Suggested changes: add additional criterion as follows <i>“(f) Positively enhance the setting of Hatherleigh Conservation Area.”</i> <i>“(g) Preserve the character and setting of the listed buildings.”</i>
OP13	103	Natural England accepts that this policy has been brought forward from previous plans. The allocation map shows that an area of priority habitat (woodland) is incorporated into the allocation. In addition the southern boundary adjoins additional priority habitat. Natural England advise that these should be protected and enhanced through the allocation and this should be in the policy.
OP13	164 LATE	The Environment Agency note that the policy and its supporting text fails to acknowledge that a small part of the site lies within the high risk Flood Zone 3 whilst more of the site lies within the medium risk Flood Zone 2. The policy should acknowledge these risks and require future development to adopt a sequential approach to its layout and design. The allocation should be supported by a Strategic Flood Risk Assessment (SFRA) Level 2.

		In addition, previous uses mean that a Contaminated Land Assessment would be required to ensure that redevelopment does not cause pollution.
OP14 (Mixed Use Regeneration Site, Woollen Mill, North Tawton)	90	Questions the deliverability of the Woollen Mill and proposes the allocation of Devonshire Gardens for 15 dwellings as an option to deliver housing.
OP14	153	<p>Historic England welcome the intention to bring back the site into use. While the text views the Grade II westernmost warehouse at the Wool Grading Centre as a constraint, neither the policy or text make any attempt to properly consider how the historic asset can inform the design and reuse of the site while safeguarding the asset and its setting.</p> <p>There is a requirement in the 1990 Act that “<i>special regard</i>” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Consequently, the need to ensure that those elements which contribute to the significance of this building are not harmed should be referred to in development guidelines.</p> <p>Suggest an additional clause is added to the policy as follows:</p> <p><i>“(f) Development proposals should safeguard the character and setting of the Grade II Listed Building to westernmost warehouse at the Wool Grading Centre as a constraint.”</i></p>
OP14	164 LATE	<p>The Environment Agency notes that the supporting text acknowledges the flood risk constraint, but the policy itself does not. The EA recommend that the policy should require future development to adopt a sequential approach to its layout and design so that the highest vulnerability uses are directed to the lowest risk parts of the site.</p> <p>The allocation should be supported by a Strategic Flood Risk Assessment (SFRA) Level 2.</p>
OP15 (Land at Mount Kelly)	33	Accept that new housing is required but would like to see limits put in place. Would not wish to see the proposed boundaries of OP15 extended.
OP15	81	Highways England does not have any objection in principle to the small scale development of the site. However, there are concerns with the wording of the policy and the impacts that could be experienced on the SRN as a result of cumulative development impacts and lack of mitigation. The wording requires the provision of, or contributions to, on site or off site infrastructure requirements associated with the development as set out in the IDP or Neighbourhood Plan. This would lead no mechanism for pooling of contributions for any infrastructure, including those relating to the SRN.
OP15	91	Devon County Council suggest that criteria (g) that GI could also offer pedestrian/cycle benefits.
OP15	119	Mount Kelly would also like Council to consider allocation of land at Old Exeter Road to augment housing delivery and provide a resource to help bring the Olympic legacy pool to the town.
OP15	148	Considers site in Whitchurch, LAA WD_45_52_08/13 was overly criticised in LAA assessment and should be allocated instead of the Mount Kelly site. A number of reasons are proposed for this.

		Note – wishes to attend EiP
OP15	151	Devon Archaeological Society suggest consideration of the following: <ul style="list-style-type: none"> • Designs should include preservation of heritage significance. • Welcome intention to protect setting of WHS & Scheduled Monument.
OP15	164 LATE	The Environment Agency supports the site specific development principles.
OP15, 16 and 17	138	It is not clear on how these allocations/policies will support “key infrastructure projects” – requires clarification
5.68-5.70	124	Reiterates views on ‘reserve sites’ made in January consultation. If New Launceston Road is an appropriate site and key part of 5 year land supply, it should be allocated, discussion around ‘reserve’ site is unnecessary. Similarly discussion around alternative should not be in the plan, but should be removed and put in the evidence base.
Table 3 Tavistock Site Selection Process Summary	91	Devon County Council note that previous traffic assessments have concluded that 750 dwellings could be accommodated on the local highway network with improvements to local junctions. DCC would support the extension of the Callington Road development site to facilitate the delivery of improved infrastructure.
OP16 (Land at Brook Farm)	81	Highways England does not have any objection in principle to the small scale development of the site. However, there are concerns with the wording of the policy and the impacts that could be experienced on the SRN as a result of cumulative development impacts and lack of mitigation. The wording requires the provision of, or contributions to, on site or off site infrastructure requirements associated with the development as set out in the IDP or Neighbourhood Plan. This would lead no mechanism for pooling of contributions for any infrastructure, including those relating to the SRN.
OP16	8,23, 29, 35, 50, 53, 54, 55, 73, 74, 79, 100, 101, 105, 108, 109 146, 149,	Objection to the allocation of the site for the following reasons: <ul style="list-style-type: none"> • Difficulty in achieving safe access • Farm vehicles etc blocking access to the site • Single track lane • Lack of road markings • Narrow Bridge • Lack of safe footpaths • Lack of streetlighting • Increase in traffic • Impact on roundabout with Business Park • Impact on leisure activity eg cycling, walking, riding • Impact on landscape • Lack of natural boundaries • Excessive in size • No need for additional housing in Tavistock • Lack of employment opportunities • Loss of privacy

		<ul style="list-style-type: none"> • Change in character of the area • Mineshafts • Loss of views • Loss of Greenbelt • Groundworks already begun on site • Application in before the plan is in place
OP16	103	Natural England advise that the location of the site to the AONB and the need to retain significant veteran trees at the site should be reflected in the policy.
OP16	164 LATE	The Environment Agency supports the site specific development principles.
OP17 (Land at New Launceston Road)	75	Support for Launceston Road site allocation as the most suitable, deliverable and sustainable site in Tavistock, but considers that it should be brought forward to earlier in the plan to provide a truly plan-led approach to meet Tavistock's housing need addressing the vulnerability in supply, including mitigating delays in the delivery of the strategic site at Callington Road, and that this approach accords with NPPF paragraph 182.
OP17	81	Highways England does not have any objection in principle to the small scale development of the site. However, there are concerns with the wording of the policy and the impacts that could be experienced on the SRN as a result of cumulative development impacts and lack of mitigation. The wording requires the provision of, or contributions to, on site or off site infrastructure requirements associated with the development as set out in the IDP or Neighbourhood Plan. This would lead no mechanism for pooling of contributions for any infrastructure, including those relating to the SRN.
OP17	22, 30, 120, 133	<p>Objection to the allocation of the site for the following reasons:</p> <ul style="list-style-type: none"> • Development of Greenfield site • Lack of infrastructure • Traffic problems caused by new pavement • Redevelop Harewood house • Future use of the cattle market should also be looked at • Re-use small brownfield sites instead • Isolated from town • Lack of local facilities • Difficult to create links to railway station • Not in walking distance to schools • Impact on hospital
OP17	128	Suggestion that around 200 homes could be accommodated in Tavistock incorrect and insufficient sites being allocated in Tavistock to meet needs, there are a number of further developable sites in the medium term, with a potential yield of 553 dwellings, including Violet Lane/ Green. The Town is also yet to be allocated as a Neighbourhood Plan area to make up any shortfall through a Neighbourhood Plan. Land at Violet Lane/ Green Lane should be allocated in the plan as it would make a positive contribution to the Town, meet recognised need and is suitable, available and achievable.
OP17	138	Objection to New Launceston Road as a new large allocation as there are reasonable alternatives including land at Callington Road South. Disagree with WDBC assessment for latter site and that sustainability credentials seem to have been downgraded since Dec 2014 draft SA. Raise a number of matters in support of site and suggest amendments to SA.

OP18 (Area of Employment Opportunity – Strawberry Farm Fields, Lifton)	37	<p>Milton Abbot Grouped Parish Council note that the development of facilities that increase employment opportunities outside main centres is generally welcomed, providing that there are appropriate safeguards against any adverse effects of such development on surrounding areas. Chillaton (and Lifton) are increasingly affected by HGVs with both villages having inadequate means of providing pedestrian safety or dealing with traffic conflicts and the unclassified road network between the two is unable to accommodate these vehicles safely at all points. The Parish Council consider that the availability of a trunk road with connections to major distributor roads, immediately adjacent to the site at Strawberry Fields, creates a viable alternative for HGVs that might otherwise use unsuitable routes.</p> <p>The Parish Council request that the Borough Council explore the potential for imposing a condition on any planning permission granted for the use of the site, or through any agreement made in connection with its development, requiring HGVs servicing premises therein to transit via the A30 trunk road.</p>
OP18	81	Highways England note that there is potential for development in this location to adversely impact on the SRN. There is a lack of transport evidence to support new allocations and therefore no identification of infrastructure or capacity enhancement which is of a concern to HE and is not in conformity with Circular 02/2013 paragraph 18. HE are happy to work with WDBC and developers to assist in establishing potential impacts on SRN.
OP18	154	Lifton Parish Council welcomes the opportunity to secure additional employment land but is concerned at the potential for an increase in heavy goods traffic through the village, although it is acknowledged that the location of the site close to the A30 goes some way towards minimising this issue.
OP19 (Area of Employment Opportunity – Yelverton Business Park, Crapstone)	43	Buckland Monachorum Parish Council is concerned by the statement that land at Crapstone is “allocated for the expansion of the existing industrial estate” given the comments regarding the relationship between Our Plan and Neighbourhood Plans. The NP is gathering evidence to understand whether there is justification for the expansion of the current business park. This evidence could conclude that such an expansion is either unwarranted or better placed elsewhere. Our Plan fails to explain how such variance will be managed.
OP19	11	<p>Support the proposal:</p> <ul style="list-style-type: none"> • Creation of employment opportunities • No impact in terms of noise, pollution or excessive increase in traffic <p>However, the access road is narrow across moorland and this could pose problems for heavy traffic</p>
OP19	9, 10,12, 13, 14, 15,16,17, 18,19, 20, 24, 25, 34, 36, 39, 40,41,51,60, 61, 63, 64, 65, 66, 67, 68, 69, 70,	<p>Objections to the proposed expansion to Yelverton Business Park for the following reasons:</p> <ul style="list-style-type: none"> • Detriment to the well being of the community • Unnecessary development • Business park not fully occupied • Additional traffic • Impact of design of business units of the countryside • Change in character of the local area which is predominantly residential • Noise pollution • Impact on the DNP and tourism • Contrary to P110 of NPPF in terms of it increasing traffic, pollution, and impacting on peace and tranquillity

	71, 76, 85, 87, 92, 98, 110, 111, 113, 117, 127, 134, 135, 152, 155, 158, 159, 151,	<ul style="list-style-type: none"> • Disruption to day to day life from activities such as deliveries, refuse collection, loading and unloading of vehicles and HGVs • Impact on wildlife • Protect greenfields especially when close to DNP • Other vacant units at Dousland and Leg o Mutton • Impact on AONB and DNP • Poor public transport • Loss of agricultural land • Potential loss of hedgerows • Safety of children on the roads • Increase in possible accidents involving animals etc • Loss of local amenity • Lack of need and should use brownfield sites before greenfields • Lack of pavements • Impact of the character of Crapstone • Jobs are not for local people • At odds with the RSS • Over development, overcrowding • Development is classed as major development as set out in Stat Instrument 2010 No 2184 Town and Country Planning , England and therefore the sequential test should be applied to the proposal. • Previous applications were refused 00396/2010/TAV • Current uses have switched to retail uses • Links to Neighbourhood Plan • Possible future conversion of employment land to residential
OP19 Landscape Assessment	103	<p>Natural England consider this is a major application to which paragraph 116 of the NPPF applies.</p> <p>The policy wording around the intended uses is not precise enough to ensure that the character of the area is not adversely harmed, and could still lead to development which is not of a size appropriate to development in a Protected Landscape.</p> <p>It is noted that the Landscape Assessment omits to state that the site is within the AONB. Whilst this assessment has considered the visibility, it has not considered the character of the area and how that might change if the industrial estate were to double in size particularly regarding increased traffic.</p> <p>Natural England advise that the evidence base to justify the allocation of additional employment is not yet sufficiently robust to be compliant with the NPPF. The need for additional employment land has not been justified nor why it needs to be within a Protected Landscape. This is a significant omission in the Sustainability Appraisal (SA) which did not consider alternative sites.</p>

		<p>WDBC will also need to show the exceptional circumstances and public interest as to why this allocation is justified in this location to show that the NPPF paragraph 116 is being complied with.</p> <p>Natural England advise that whilst a small extension of the site may be capable of justification, the present allocation will require additional evidence for it to be justified and has a high risk of delivery and therefore advise that the current policy is unsound.</p>
Managing Development Without Boundaries Para 5.78	44	Suggests a caveat needs to be added to the wording to say that WDBC will be mindful about the possible accumulative effect which will be resisted and that development will not be supported where this effect is/or may become apparent. This is made clear in para 9.14 under Our Local Landscapes but should be repeated here.
Managing Development Without Boundaries Para 5.80	43	Buckland Monachorum Parish Council is concerned that the proposal as set out in para 5.80 is too ambiguous. An alternative approach could be to retain Settlement Boundaries but extend them in a properly considered manner, to prevent such ambiguity and would allow local services to be developed alongside managed expansion.
OP20	41	<p>The policy should</p> <ul style="list-style-type: none"> • Specify which requirements have to be met in a clear and unambiguous way • Set clear limitations on allowable number of units under this policy • Specify that development proposals must be in line with any Neighbourhood Plan <p>Question how will cumulative impact be measured Clarity required around the relationship to proposals in Neighbourhood Plans Greater emphasis should be placed on the re-use of previously developed land</p>
OP20 & OP21	37	Milton Abbot Grouped Parish Council supports the policies as practical measures to enable local needs to be met within a framework that provides suitable safeguards against unwarranted development.
OP20	82	It is unnecessary to cap at 2 dwellings, conflicts with presumption in favour of sustainable development. Cap should be deleted.
OP20 & OP21	89	No allowance for increased quantities of housing that will be needed.
OP20	90	A number of criteria over-prescriptive and limits opportunities to bring forward sensible development. Blanket threshold of 2 too restrictive and a higher limit should be applied to Main Towns and Local Centres (15 would be a suitable limit for Local Centres); the requirement for a site to be bound on at least one side by development should be removed, requiring proposals to be for gypsy and traveller sites should be deleted and other criteria should not instantly limit opportunities; word "exceptional" should be removed from second paragraph to enable sensible schemes to come forward.
OP20 & OP21	91	Devon County Council note that the modelled need for gypsy and traveller accommodation in West Devon is 5 pitches. With reference to criteria (m) in OP20 and criteria (k) in OP21, DCC question what would make suitable accommodation within that area. It is noted that there is no definition for travellers to use when they are looking for such sites and it also assumes travellers have the means to provide the pitches themselves.

		<p>OP20 also applies a 2 unit threshold. DCC question whether this would be classes as two sites providing x number of pitches or does 2 units mean two pitches? Clarification is requested.</p> <p>DCC suggest that a deliverable approach could include the delivery of these five pitches as part of the affordable housing contribution to residential development sites.</p>
OP20	97	Application of threshold of 2 dwellings will not allow for affordable housing contributions under new guidelines and should be increased to 6 in main villages and 11 in Tavistock and Okehampton. Criteria f is unworkable and criteria j is poorly worded giving the impression that CIL is discretionary.
OP20	97	Wording should more robustly express that requirements of care homes demands standalone developments that are adjacent to, but not in development boundaries. OP21 goes somewhat towards this for smaller villages only and OP20 only refers to small housing development.
OP20	103	Natural England supports opportunities for appropriate, small scale, organic growth in settlements of all scales. It is noted that this policy is generally only concerned with very small development. However, this policy in association with OP5 could allow development of up to 15 houses in settlements in “exceptional circumstances”. The definition of exceptional circumstances, also used in other policies, which refers to the protection and enhancement of protected landscapes and other designations. There is therefore the opportunity for mis-interpretation of Plan Policy and National Policy. Case law has considered ‘exceptional circumstances’. Based on recent case law in Solihull, the principle that exceptional circumstances always require more than general planning consideration needs to be considered more fully. As such, NE advise that the test of “exceptional circumstances” as defined in the Plan does not appear to be compatible with the test for exceptional circumstances in paragraph 116 of the NPPF. The policy is therefore not in accordance with national policy and not presently sound.
OP20	128	Unclear why threshold of only 2 units is proposed for all small scale development well related to settlements. Should be proportionate to size, role and function of settlement.
OP20	157	Inconsistent with aims of NPPF, not clear what development is supported and numerical restriction inappropriate and could lead to a shortfall in supply, also at odds with OP4 which mentions under 15 for smaller settlements, also contrary to NPPG as restricting housing development which should be avoided. Not clear if “units” relates to housing or other types of development.
OP21 (Managing Development in Smaller Villages, Hamlets and the Open Countryside)	38	Sydenham Damerel PC welcomes Policy OP21. The current restrictive policies often prevent the sustainability of rural areas and offer little flexibility for small scale development. It is hoped that this policy will enable small scale development that will allow communities to prosper, encourage young people to reside, encouraging a more balanced community for the future.
OP21	44	Clause (a) contradicts the statement in OP4 where (sustainable) development will only be supported in exceptional circumstances. Suggest clause (a) is deleted.

		Clause (f) – add ‘of the settlement’ after the word ‘tenure’.
OP21	50	If settlement boundaries are to be removed, the Council must be very strict on the 2 dwelling threshold. Concerned about the level of housing development being dictated by central government to rural areas.
OP21	96	Sourton Parish Council considers the policy needs amending to add clarity. Suggest deleting clause (a) and instead insert “Development of up to 2 units will be supported where....” (as in OP20). Without this change, the Parish Council would not support the proposal to allow development outside of the settlement boundaries.
OP21	97	Does not make allowances for cross-subsidy to secure affordable housing. Current Affordable Housing Code redundant in view of recent changes to thresholds. Questions how criteria c in respect of reducing use of private car will be assessed/demonstrated.
OP21	103	Natural England note that in conjunction with OP31, the policy could permit a minimum of 6 houses in sites outside allocations to support affordable housing needs. The wording of the policy does not include the relevant wording to prevent harm to designated sites commensurate with their weighting. This policy could be made sound by the addition of reference to revised policies OP37 and OP40.
OP21	104	Policy OP21 has restricting criteria which will reassure many local residents but disagrees that the criteria should apply. Considers that the standard criteria that applies to all development across the Borough is sufficient for hamlets and villages and that additional specified criteria is not required.
OP21	154	Lifton Parish Council asks whether it would be reasonable to include reference to the re-use of redundant agricultural buildings where farms diversify into tourism. Suggest that sometimes the interpretation of sustainability frustrates such development.
OP21	157	Should not restrict rural development to being bounded on one side by development as could prevent site just metres away from existing development from coming forward, contrary to para 54 and 55 of NPPF.
OP21 & OP24	157	OP21 and OP24 touch on the re-use of redundant and rural buildings but the policies fail to set out acceptable parameters for undertaking conversions. Could also be included in “Our Heritage”
Neighbourhood Planning Para 5.84	47	Bere Ferrers Parish Council suggest the wording regarding the fact that neighbourhood plans need to be in conformity with policies of Our Plan could lead some to think preparing one is a waste of time – suggest wording changed to promote as partnership working.
Neighbourhood Planning	128	The Council should look to identify sufficient sites in the plan rather than rely on Neighbourhood Plans and site allocations documents. Planning Practice Guidance is clear that the Government’s preferred approach is for a single plan and there should be clear justification for additional documents.
OP22 (Neighbourhood Planning)	47	Bere Ferrers Parish Council note that OP22 makes no mention of the role of Town and Parish Councils in setting up NP area and Group.
OP22 & OP23	96	Sourton Parish Council is delighted to see a good supportive section with regards to Neighbourhood Plans.
OP22 & OP23	82	OP22 and OP23 should: <ul style="list-style-type: none"> • Set out a list of policies it considers relevant and strategic to NP to minimise conflict (as per East Staffordshire) • Clearly define what is meant by “no clear intention of progressing Neighbourhood Development Plans” • Apply a, b and c within areas of emerging Neighbourhood Plans to ensure housing growth in interim.
OP22 & OP23	103	Natural England note that the HRA highlighted the potential Likely Significant Effect of recreational disturbance to the Tamar Estuary SPA and mitigation measures. Under the 2012 Neighbourhood Plan regulations, Neighbourhood Plans must be

		able to rule out any Likely Significant Effect and any mitigation measures needed to reduce the effects to insignificant on European sites must be undertaken by the Local Plan and not the Neighbourhood Plan. Therefore the mitigation measures proposed in the HRA must be incorporated into Our Plan and not deferred to the Neighbourhood Plan. At this stage it is not clear whether development outside of the Bere Peninsula can rule out likely significant effects. Additional evidence will be needed to assess whether this is the case.
OP22	124	Admires the intention to support the preparation on Neighbourhood Plans for every settlement but questions whether the Local Authority has the resource to support to achieve this. Suggest a means of prioritisation is introduced or additional resources identified.
OP22	112	Fully supports the concept of Our Plan incorporating Neighbourhood Planning and looks forward to the opportunity of contributing to the Okehampton Town and Hamlets plan.
OP23 (Neighbourhood Planning – Meeting Planned Requirements)	43	Buckland Monachorum Parish Council note that it is not clear on the relationship between Our Plan and Neighbourhood Plans being prepared, particularly if there are occasions where policies in Neighbourhood Plans contradict Our Plan.
OP23	90	OP23 – Timescales could artificially hold back development. Policy needs to provide more flexibility to bring forward sensible housing schemes straightaway. An additional paragraph is suggested: <i>“Prior to the adoption of Neighbourhood Plans, sustainable housing development that complies with the unit thresholds set out in OP20 will be supported where:</i> <ul style="list-style-type: none"> • <i>It is physically well related to the nearest settlement;</i> • <i>It is appropriate in scale for the role and function of the settlement;</i> • <i>It uses land efficiently, including the reuse of previously developed land.”</i>
OP23	128	Council placing significant reliance on developments coming forward from Neighbourhood Plans which is unlikely to be achieved and should also not be setting timescales for these as they are not compulsory.
Future Development Options Para 5.90-5.91	128	Do not consider potential new settlement as a strategically sound option. The Main towns should continue to remain the focus of development.

Our Economy

Policy/Para/Section	Rep no.	Key Issue(s)
Our Economy	156	<p>Transition Tavistock and SW Devon Community Energy Partnership considers that the importance of key local sectors such as agriculture, food, energy and housing seems to be underplayed. New technologies and importantly development of local supply chains can have a major impact on strengthening this sector. There is also a need for solid employment for those who are manually gifted as well as those gifted in other ways, such as engineers and academics.</p> <p>There is a need, generally, to work on strengthening local supply chains, local resilience and improving the local multiplier.</p>
Para 6.13	156	Transition Tavistock and SW Devon Community Energy Partnership consider that this paragraph could mention initiatives such as Tavistock and District Local Enterprise Blueprint which will be complete in June.
Town Centres para 6.18 and 6.20	162	Considers it inappropriate for Waitrose to be singled out as an important retailer.
Para 6.25	156	Transition Tavistock and SW Devon Community Energy Partnership considers that an important aspect of the local economy is the ownership of local retail premises and whether they are independent. Considers that a large retail chain will not put so much back into the local economy through the multiplier, although there may be external footfall generated.
Para 6.34	156	Transition Tavistock and SW Devon Community Energy Partnership note that there does not seem to be any definition of A1 etc and considers this unhelpful.
OP24 (Supporting West Devon's Economy)	132	Notes that there is no cross reference in this to supporting other objectives (e.g. health, community resilience, accessibility) and considers this is a missed opportunity.
OP24	157	Lack of clarity and emphasis on point e relating to rural economy. Policy not sufficiently clear and places no emphasis on rural economy, in particular supporting rural tourism and scope for holiday accommodation or guidance when such use is no longer required, and facilitating remote working in recognition of home working and live/work units.
OP26 (Promoting Competitive Town Centres)	132	Would like to see specific reference to promoting access to local food within the policy.
OP29 (Neighbourhood and Village shopping)	37	Milton Abbot Grouped Parish Council note that there is no point in forcing redundant business premises to remain in limbo, when it is clear that it cannot be sold to another operator. However, the Parish Council do consider that there should be a more objective test of future viability that 'no reasonable prospect' and suggests the following words be added <u>"...business continuing as evidenced by the failure of the owner to achieve a sale of the premises for the business use concerned at or below the market value, for a period of 12 months, despite the professional marketing of the property throughout that period."</u>
OP29	156	Transition Tavistock and SW Devon Community Energy Partnership considers that a community should be given the chance to deliver a community based initiative.

Hatherleigh	56	Hatherleigh Town Council notes that employment opportunities are lacking and building housing with no prospect of local employment further exacerbates a commuter culture. This type of development puts pressure on community services without benefitting local shops.
Okehampton	118	Questions where new residents in the town will find employment and raises concerns about commuting to other places of work (e.g Exeter, Launceston, Plymouth). Concerns around infrastructure improvements to accommodate new development.

Our Homes

Policy/Para/Section	Rep no.	Key Issue(s)
General	7	Reasonable sized single occupancy houses should be encouraged to free up family sized housing to allow for downsizing.
Our Homes	5	The Devon Rural Housing Partnership raise concerns that only 16 settlements where development is expected, leaving many settlements where development will be discouraged and planning permission granted in exceptional circumstances due to perceived unsustainability. If this is the case, then evidence of housing need is vital to support development on exception sites. It is crucial that smaller rural settlements are not judged as unsustainable and written off for future development purely because of the lack of local facilities.
Page 66 (Our Homes)	162	Housing policies should show a prioritisation for 1 and 2 bedroom properties to avoid the weaknesses of the bedroom tax. Suggest that market forces always priorities 3 bed properties.
OP30 (Inclusive Communities)	37	Milton Abbot Grouped Parish Council welcomes this policy as a practical reflection of the variety of local housing need likely to be found in rural parishes.
OP30	104	Supports the policy and would oppose any changes.
OP30	131	Reference to Lifetime Homes not compliant with Ministerial Statement 25 th March 2015 concerning zero carbon homes and housing standards.
OP30	132	Agree with all of the points.
OP30	156	Transition Tavistock and SW Devon Community Energy Partnership suggest that self-build and the development of other housing types based around the community, co-operative and land trust concepts should be both supported and encouraged.
OP30	157	Bullet point b should be revised to remove reference to 1,2 and 3 bedrooms as larger homes will be required.
Empty Homes Para 7.8	47	Bere Ferrers Parish Council suggest query the ability of the Borough Council to bring homes into use given experience of one property in Bere Alston
OP31 (Affordable Housing)	75	Viability report suggests 30% unviable in Tavistock and that 20% is deliverable, the policy should be altered to a requirement of 20% as this is more realistic and allows for higher community fund providing benefits to the wider community.
OP31	82	The affordable housing thresholds need to comply with recent guidance. Policy should reflect this.
OP31	89	Incongruous to reduce affordable housing target when Council failing to deliver anywhere near target.
OP31	91	Devon County Council suggest that the interaction between affordable housing and infrastructure requirements should be acknowledged in the policy context of development viability. Affordable housing should not compromise the critical infrastructure necessary to support sustainable development.
OP31	96	Sourton Parish Council is pleased to see policy OP31 that will require developments of 6 or more will need to provide affordable housing.
OP31	97	An absolute target is preferred to an “up to” as provides too much scope to offer less. The Viability assessment does not conclude that 40% target is unviable , rather that it would preclude the Council asking for a community fund. It appears that 30% has been selected to maximise other funding at the expense of affordable housing provision. It also factors in Code for Sustainable Homes

		which has been replaced with National Space Standards. Do not agree with this balance and highlight criticism of charging schedules that have used this approach.
OP31	124	You do not need to state 'subject to viability' as this is stated in national policy and regulations.
OP31	124	The respondent suggests that the plan should not use the phrase 'up to 30%'. 5, 10, 15 or 20% would accord with this policy. The policy should read "30%".
OP31	128	Agree need for development to make appropriate provision for affordable housing but also needs to be viable. Specific reference should be made for the need for an element of negotiation.
OP31	131	Policy requires 30% contribution which is not viable as per viability assessment – Council is being too ambitious and will result in delayed development. Not compliant with Para 173 and 174 whereby development should not be subject to a scale of burdens that threatens viability. Target should be revised.
OP31	131	Policy should specify that financial contributions on 6-10 units are deferred payments to be paid on completion.
OP31	157	Policy could go further in encouraging an imaginative range of affordable tenures (relates to OP30)

Our Infrastructure

Policy/Para/Section	Rep no.	Key Issue(s)
General <i>Bere Alston</i>	3	Infrastructure constraints are the main concern with Our Plan. Comments relate specifically to Bere Alston. Concerned about pedestrian safety due to lack of pavements and limited ability to add due to narrow roads. Need radical changes i.e. limit parking on some roads, one way system. Concern over decrease in doctor's surgery facilities and ability to influence the running of the surgery
General <i>Bere Alston</i>	4	Concerned about the capacity of the primary school and its ability to accommodate additional development. Also raises concerns about the impact of any development in Bere Alston on AONB.
General <i>Bere Alston</i>	6	Suggests that before any more development takes place in Bere Alston, there should be improvements to Denham Bridge which is difficult to negotiate due to increased traffic.
General <i>Okehampton</i>	26	Encourages the Council to ensure that Okehampton Town Council via Destination Okehampton is fully represented on the DCC Peninsula Rail Task Force. Railway provision and services in Okehampton will help to revive the economy of Okehampton and its hinterland.
General	44	WDBC must make it a priority to enforce s106 agreements to ensure the delivery of Our Plan objectives.
General	45	Considers that the plan pays lip service to definitive infrastructure developments in Tavistock and concerns that new development will lead to increased traffic congestion. There are no concrete plans for new medical provision. Concerns at knock on impact of A&E department at Derriford if people cannot see their GP.
General	51	Suggest that the plan should safeguard the railway route between Okehampton and Exeter.
General	96	Sourton Parish Council considers that if we want to reduce carbon emissions we should be increasing public transport provision and not reducing it. A better two way communication with DCC is required.
General <i>Okehampton</i>	99	The respondent considers that in Okehampton there needs to be an increase public transport in outlying areas to access facilities and when/if train line reinstated to encourage usage.
General	112	Raises concerns about previous developments in Okehampton and resulting issues (around adoption of highways) at a cost to local residents. Based on these previous issues, there are concerns about how WDBC and DCC will manage future development accordingly, particularly around section 38, 104 and 106 agreements.
General	114	Considers that Okehampton has been failed by development in the town, with new development not making any visible improvements to infrastructure or jobs. Considers that the WDBC strategy should only allow housing development once new business development has progressed sufficiently to provide at least 400 jobs. Feels that the 900 homes should not be built until the Business Park is completed and the primary school provided.
General	116	Wishes to see infrastructure being put in place before the development of new homes.
General	120	Rail links Support proposals to reinstate the railway line between Bere Alston and Tavistock. However the location of the station seems a bit short sighted given national plans to find an alternative route for the Dawlish line.

		<p>Should use the existing North Station as the new Tavistock station. This would mean resiting homes and the Council Offices but would provide better located rail station.</p> <p>Hospital Lack of plans for a new update hospital for Tavistock which would provide better services for the community. Improving local services will take pressure off Derriford. For Tavistock to remain and excellent town it should have excellent road and rail links and a fully functional capable hospital.</p>
General	156	Transition Tavistock and SW Devon Community Energy Partnership consider that the references to viability offer developers a 'get out of jail free' card. Within reason anything can be designed to be viable.
General Infrastructure Para 8.3	91	<p>Devon County Council suggests that libraries and social care provision are added to the list of infrastructure.</p> <p>DCC also note that affordable housing is already covered by specific policies in the plan and does not need to appear in the list.</p>
Our Infrastructure Para 8.3	164 LATE	The Environment Agency suggests that flood management and surface water infrastructure are added to the list of infrastructure at paragraph 8.3.
OP32 (Infrastructure Provision)	75	Position with regard to whether WDBC intends to implement a CIL or continue with S106 requires clarification.
OP32	75	Difficult to deliver new/improved infrastructure in phase with or in advance of the development due to funding models (developers need an element of income to provide the infrastructure).
OP32	81	Highways England support this policy but note the lack of reference in the IDP to works to the A30/SRN.
OP32	91	Devon County Council suggest instead of 'subject to viability' at the end of paragraph 1, it should read <i>"having regard to viability."</i>
OP32	132	Notes that the effectiveness of the policy depends on how it is implemented.
OP7, OP9, OP32, OP35	83	<p>Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base (as set out above in comment no.1). This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.</p> <p>All new dwellings in West Devon in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p> <p>'Sporting and recreation facilities' are included within the definition of Community Infrastructure Levy (CIL) infrastructure in the 2008 Planning Act (section 216) which means money raised can be used to fund new or enhanced sports facilities.</p> <p>For sport and recreation, Sport England would advise that generally it may be more effective if the contributions are sought through planning obligations rather than CIL, unless there is a specific project identified. If such a project is deliverable, then it may be more appropriate to fund through CIL and consequentially should on the Regulation 123 List.</p> <p>In removing 'playing fields' from the Regulation 123 List and focussing on the use of Section 106 Agreements the Council should be aware that after April 2015, no more than five planning obligations can be used to pool funds for any one piece of</p>

		<p>infrastructure/project. Therefore the Council will need to think quite strategically and plan effectively for sports infrastructure delivery in the future linking development sites with specific projects to meet identified sporting needs. This will enable the Council to take a proactive approach and ensure the most effective use of planning obligations and CIL together to help deliver this/meet the needs of the population.</p> <p>Any planning obligations must also pass the following tests as set out in paragraph 204 of the NPPF:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; and • fairly and reasonably related in scale and kind to the development
OP32	164 LATE	The Environment Agency support the policy. In light of the partnership funding approach to providing and upgrading flood defence infrastructure, it will be important that this policy helps to support the establishment of funding strategies to determine levels of contribution where multiple benefits would benefit from various infrastructure projects. The EA would welcome early discussions regarding the formulation of such strategies.
Communications Technology Para 8.10	44	Does not accept the statement that “The Council is mindful not to raise the hope of all residents for providing such provision” and considers that WDBC should be lobbying government for the provision of broadband and electronic communication to rural areas where provision has no economic benefits and there is no prospect of companies delivering such a service.
Communications Technology Para 8.10	96	Sourton Parish Council does not accept the statement that “The Council is mindful not to raise the hope of all residents for providing such provision” and considers that WDBC should be applying pressure to government for the provision of broadband and electronic communication to rural areas where provision has no economic benefits and there is no prospect of companies delivering such a service.
OP33 (Communications Infrastructure)	78	<p>The Mobile Operators Association considers that criteria (b) is ambiguous in its wording and that it should be recognised that a developments visibility, siting and appearance do not automatically result in an overwhelming adverse harm. Suggest an amendment to the wording as follows:</p> <p><i><u>‘b. It has been demonstrated that alternative, less environmentally harmful means of providing the same service is not feasible; -If proposing a new mast, it has been demonstrated that the applicant has explored alternative options.’</u></i></p>
OP33	78	<p>The Mobile Operators Association considers that criteria (d) could be open to misinterpretation. In order to bring the policy in line with technical requirements contained in paragraph 45 of the NPPF, the following amendment to the wording is suggested:</p> <p><i><u>“d. Proposals adhere to current Government advice on the health effects of exposure to radio waves; and Applications for telecommunications apparatus must include a certificate confirming that the development will operate within the International Commission for Non Ionising Radiation Protection (ICNIRP) guidelines for public exposure; and”</u></i></p>
OP33	78	The Mobile Operators Association considers that criteria (e) is overly restrictive in relation to telecommunications development. Whilst the design of certain telecommunications base stations will allow for future upgrades, it is not physically possible in every case. When Operators identify the need for a new base station in an existing area, they will consider the availability of upgrading an existing telecommunications site as part of the site selection procedure and details would be submitted along with an application. As such, suggest that criteria (e) is removed.
OP33	78	The Mobile Operators Association consider it would be useful to create a concise and flexible telecommunications policy and suggest the following wording:

		<p><u>“Proposals for telecommunications development will be permitted provided that the following criteria are met:</u></p> <ol style="list-style-type: none"> a. <u>The siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</u> b. <u>If on a building, apparatus and associated structures should be sites and designed in order to seek to minimise impact on the external appearance of the host building;</u> c. <u>If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the local planning authority; and</u> d. <u>If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance archaeological sites, conservation areas or buildings of architectural or historic interest.</u> <p><u>When considering applications of telecommunications development, the local planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of technology.</u></p> <p>The MOA also considers it appropriate to introduce the policy and would suggest the following wording:</p> <p><i>‘Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.’</i></p>
Transport Infrastructure Para 8.12 and 8.15	162	These paragraphs highlight the councils supporting role for new/improved road infrastructure but question where the leadership role is. There is often conflict between some road users (e.g. HGVs and vans) and the nature of Devon roads. Suggest removing bends and/or straightening roads or ban lorries.
Para 8.12	91	Devon County Council suggest the last sentence should read <i>“New development can place additional pressure on our transport infrastructure and it will be is crucial to ensure that the impact of new development on our highway, footpath and bridleway networks can be addressed appropriately. As well as on the local highway network “</i>
Para 8.17	44	The text alludes to the Local Transport Plan (LTP3) but does not identify where this plan can be found or the priorities.
Para 8.17	91	Devon County Council suggest amending the wording as follows: <i>“...Local Transport Plan (LTP) 3, and input will be provided into future iterations of the LTP, <u>including the Transport Infrastructure Plan, with a view to...</u>”</i>
Community Transport Para 8.18	91	Devon County Council suggest this paragraph could usefully reference DCC’s role in Community Transport provision.
Transport Statement and	91	Devon County Council suggest the heading is amended to <i>“Transport <u>Assessments/Statements and Green Travel Plans”</u></i>

Green Travel Plans Para 8.24		In addition, DCC also request that the accompanying text should not specifically refer to 'green' travel plans, but travel plans more broadly. Also suggest that transport assessments should be recognised.
OP34 (Transport Infrastructure)	43	Buckland Monachorum Parish Council note that whilst the plan recognises the importance of good public services serving rural communities, this does not appear to be reflected in the provision of such services within the Parish where bus services to and from remote villages are being cut. The Parish Council would like to see a specific policy on maintaining good transport links in isolated communities which link up to arterial routes.
OP34	81	Highways England generally support this policy but note the lack of reference in the IDP to works on the A30/SRN.
OP34	104	This policy identifies general practical policies but does not address the increasing traffic volumes on the A386 through the centre of Tavistock. This should be considered as a major issue in the medium/long term and requires a specific solution such as routing traffic via Abbey Rise and Pixon Lane.
OP34	132	Agree with the policy approach. The effectiveness of the policy depends on how it is implemented.
OP34	150	Dartmoor National Park Authority suggest clarity is required around clause (g), perhaps in the supporting text, that the route of the former line lies partly in the Borough Council plan area, and part with the Dartmoor National Park. DNPA suggest a safeguarding policy should be included in the proposals map where it lies within the Borough Council plan area.
OP34	122	Okehampton Town Council considers that the plan would benefit from a policy that actively promotes rail travel as a significant element of transport infrastructure. The current wording is passive (OP34 (g)). An additional policy to actively support and promote the development and extension of rail transport opportunities would be welcomed by the Town Council. Suggest that the existing rail route should be identified between Meldon – Okehampton – Sampford Courtenay in the maps on pages 3, 108 and 109.
OP34	91	Devon County Council suggest this policy could be an appropriate location to address parking standards and highway safety. Criteria (c) could usefully refer to public transport. Criteria (d) should refer to transport assessments and travel plans (not green travel plans).
Providing Services Locally Para 8.25 – 8.27	44	Considers a policy is needed to support paragraphs 8.25 – 8.27
OP35 (Open Space, Sport and Recreation)	46	Policy should include reference to providing accessible woodland. Woodland Access Standard (WASt) devised by the Woodland Trust is recommended.
OP35 and Para 8.30	47	Bere Ferrers Parish Council suggest including the retention of allotments as an important recreational and sustainable facility (mention new ones in 8.31)
OP35	104	Policy refers to the provision of sport and recreation facilities for developments of 5 or more dwellings. This is possibly over-ambitious in view of the more sophisticated sports facilities in the current era such as artificial turf pitches etc.
Education	91	Devon County Council suggest that the paragraph could usefully mention DCC Education s106 policy in addition to the Education

Para 8.35		Infrastructure Plan. Suggest it could also emphasise the importance of local education facilities to communities and the role they play in the social cohesion of towns and villages.
OP36 (Community Services and Facilities)	91	Devon County Council suggest that youth and social care services should be mentioned in this policy and seek clarification whether libraries are classed as cultural facilities.
OP36	93	<p>The Theatres Trust suggest that policy OP36 is strengthened with amended wording along the lines of: <u>“Existing services and community facilities should be retained where there is a continuing need will be safeguarded and sustained by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meets the needs of the local population, or it has been clearly demonstrated that there is no longer a public need or demand for that facility.”</u></p> <p>The Theatres Trust is also keen to ensure that local plans reflect paragraph 70 of the NPPF.</p> <p>The Theatres Trust also suggest removing the reference to open space, sport and recreation facilities as they are already included in policy OP35.</p>
OP36	132	Agree with the policy approach but is disappointed that while ‘places of worship’ are recognised as infrastructure in the introduction to the chapter, there is no further reference to them. Many act as wider community hubs but sources of funding for maintenance are often closed to such groups.

Our Environment

Policy/Para/ Section	Rep no.	Key Issue(s)
Our Environment Para 9.4	44	This paragraph should be the basic underlying statement for the whole of Our Plan and not just this section.
Our Environment Para 9.4	156	Transition Tavistock and SW Devon Community Energy Partnership note that research has shown the importance of trees in taking out air pollution and PM. Suggest there should be trees planted in front of all residential accommodation and schools, cars should not be allowed to park immediately outside a school nor have an engine idling.
Our Environment	156	Transition Tavistock and SW Devon Community Energy Partnership suggest the Our Environment section needs to include reference to low carbon. Although this is included in the Our Resources section, not to include it within Our Environment is misleading.
Our Nationally Important Landscapes Para 9.5	151	Devon Archaeological Society suggest cross reference to the mining WHS an internationally designated landscape as well as a heritage asset.
OP37 & OP38	37	<p>Milton Abbot Grouped Parish Council are concerned that despite the range of policies, each with a desirable outcome, some of the Our Plan policies conflict with one another where development is proposed in sensitive locations, and in practical terms, a balance has to be struck.</p> <p>The Parish Council does not consider that the Plan has provided sufficiently robust and objective measures to assist in resolving the competing merits of wind turbines and solar farms and the landscapes in which it is proposed they are located. The failure is not reflected in the efforts of other local authorities who have carried out Landscape Sensitivity Assessments of the various LCTs in their areas, with particular regard to the impact of wind turbines and solar farms.</p> <p>Although policy OP48 requires developers to show how the Devon Landscape Policy Group Advice Note 2: Accommodating Wind and Solar PV Developments in Devon's Landscape 'has been taken into account', this is a partially subjective and insufficiently robust requirement, given the quality and value of the non-statutory protected landscapes in the Borough. The Parish Council considers that it is essential that Landscape Sensitivity Assessments are carried out in respect of non-statutory protected landscapes and are used as criteria to apply relevant policies in the plan. The Parish Council therefore objects to the omission of Landscape Sensitivity Assessments from policy OP38 because of the inadequate degree of protection for non-statutory protected landscapes it currently provides.</p>
OP37 Para 9.5 and Proposals	47	Bere Ferrers Parish Council suggest including reference to the World Heritage Site and mark boundary currently on Bere Alston map, page 117 (part of village in WHS)

Maps		
OP37	103	<p>Natural England note that this policy reflects paragraph 115 of the NPPF which is welcome. However, the three tests in paragraph 116 for development within the AONB are not reflected in it. Natural England advise that the policy should also set out the only circumstances in which major development will be permitted.</p> <p>The policy could be improved by stating that major applications must be accompanied by a Landscape and Visual Impact Assessment to the latest GLVIA guidelines, in this case the third edition.</p>
OP37 (Nationally Protected Landscapes) OP38 (Landscape Character) OP40 (Biodiversity)	104	<p>Protection of SSSI, AONB and World Heritage Site should include sufficient protection against activities such as extensive commercial pheasant shooting is allowed to operate in the lower reaches of the Tavy Estuary. This is having a significant detrimental impact on the landscape character, wildlife and biodiversity in this area.</p>
OP37 (Nationally Protected Landscapes)	44	<p>Good to see the first two statements of the policy.</p> <p>Suggest that there needs to be a definition of ‘major development’.</p> <p>The last sentence needs the words ‘<i>or whose size is detrimental to...</i>’ added after ‘...will have significant impact’.</p>
OP37	41, 61	<p>Would like to see stronger protection of nationally protected landscape</p> <p>Definition of major development and how this is assessed – should the sequential test be applied?</p>
OP37	132	<p>Agrees with policy approach.</p>
OP37	150	<p>Dartmoor National Park Authority suggest this policy is re-phrased, and suggest that SP17 of the Core Strategy would provide better wording:</p> <p><i>“Recognising the great weight which should be given to the conservation of protected landscapes on sites outside Areas of Outstanding Natural Beauty and the Dartmoor National Park, particularly on the fringe areas of designated landscapes, development will not be permitted which would damage their <u>setting</u>, natural beauty, character and special qualities or prejudice achievement of their designated purposes.”</i></p>
Our Local Landscapes Page 79	44	<p>Encouraged to see reference to the Landscape Character Assessment. This should remain a live document that is not abandoned because it is challenged for being out of date.</p>
Our Local Landscapes	96	<p>Sourton Parish Council is encouraged to see reference to the Landscape Character Assessment. This should remain a live document that is not abandoned because it is challenged for being out of date.</p>
OP38 (Landscape Character)	44	<p>The last paragraph is an important statement and should be incorporated into the first paragraph and the words ‘<i>where necessary</i>’ should be deleted.</p>

OP38	44	The last statement in the policy should be one of the policy conditions.
OP38	46	Policy should include reference to woodland creation as part of development planting. Following wording suggested: "Developments should include landscaping schemes that retain <u>and expand where appropriate</u> existing landscape features such as trees and hedgerows".
OP38	103	Natural England welcome this policy. However, it could be improved by stating that major applications must be accompanied by a Landscape and Visual Impact Assessment to the latest GLVIA guidelines, in this case the third edition.
OP38	132	Agrees with policy approach. Would like to point out that trees and hedges have value for other objectives as well as being part of the landscape and therefore questions why the "where necessary" qualification is needed.
OP38	154	Lifton Parish Council asks where it is possible to protect, or identify measures to protect the currently un-designated landscape character of the Borough. Non-protected areas are particularly vulnerable to highly visible renewable energy schemes which are becoming more and more divisive in rural communities.
OP39 (Green Infrastructure)	99	The respondent welcomes the recognition of important landscapes in policy OP39 but notes that there is little recognition of North Devon Biosphere and protection from visual detriment for this, Tamar Valley AONB and DNP.
OP39	103	Natural England welcome this policy. However this policy could be improved by specific reference to the recently completed West Devon Green Infrastructure Assessment. We advise that the Plan must " <i>identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;</i> " to ensure that this policy and OP40 can be complied with.
OP39	132	Agrees with policy approach but considers the "where appropriate" weakens the policy too much and suggests "wherever possible" would be better.
OP39	164 LATE	The Environment Agency fully supports this policy.
OP40 (Biodiversity)	44	The first statement is strong, but is only meaningful if implemented. Feels that previously the support for biodiversity has been empty words. Considers that clause (e) is an empty and dangerous statement. There should be a very clear statement as to what will be considered in making the assessment. National Park Authorities exist in part to counter this statement when related to our finest landscapes. This definition cannot and must not be seen in economic terms.
OP40	46	Object to para (c) it needs to provide adequate protection to ancient woodland and include ancient/veteran trees. Suggest additional paragraph to read: "Development which would result in the loss of Ancient Woodland, Aged trees or Veteran trees will not be permitted".
OP40	103	Natural England consider the current policy wording is unsound. Policies should be made sound by following guidance within all the bullet points of NPPF paragraph 118. Natural England also wish to note that it will not be possible to replace some irreplaceable priority habitats such as ancient woodland. The wording in the second part of the policy must recognise this and the wording regarding irreplaceable habitats in para 118 of the NPPF.

		The final paragraph reflects protection of species and not the framework for designated sites.
OP40	132	Agrees with policy approach.
OP40	164 LATE	The Environment Agency support this policy and are pleased to see that the plan consistently acknowledges the importance of protecting, and where possible, enhancing, biodiversity and green infrastructure. However, the EA would recommend that the wording in the final sentence of paragraph 9.20 is strengthened by substituting 'will' for 'is keen to' could address this.
Flooding Para 9.33	91	Devon County Council suggest that the role of DCC as Lead Local Flood Authority should be mentioned here.
OP41 (Flood Risk)	46	Policy should reference the role that trees and woods can play in delivering solutions to water quality and flow issues.
OP41	132	Agrees with policy approach.
OP41	164 LATE	The Environment Agency in general support this policy. However, the EA recommend that additions are made to the policy text regarding development which is to be located within Flood Zones 2 and 3. The EA recommend that the policy highlights a sequential approach should be taken to the layout and design of development, which would be in addition to the sequential test and a necessary part of showing how the exception test, if necessary, can be satisfied. In addition, the text should highlight, in line with the PPG, that for development to be considered safe it should include safe access and egress for users.
OP42 (Resource Quality)	44	Suggest adding " <i>and habitats</i> " after 'valued soils' to clause (f).
OP42	103	Natural England note that some developments can contribute adverse air quality impacts to environmentally sensitive sites. The policy and text should be improved by highlighting the potential effect in the text and stating in policy criteria (c) that air quality assessments will be required for such development within 4km of the site. This omission is also noted in comments on the HRA.
OP42	132	Agrees with policy approach, particularly clause (f).
OP42	164 LATE	The Environment Agency in general supports this policy and welcome paragraphs 9.30-9.31 which relate specifically to water quality but note that there is no specific stand alone water quality related policy. The EA recommend that the supporting text for water quality and resource quality are combined into one environmental resource quality section. In relation to satisfying criteria (d), the EA would also stress the importance of some policy wording to ensure that, in line with the PPG, new developments and redevelopments do not allow surface water to discharge to combined sewer systems.
Our Design	44	The design of new development is vitally important and as such, suggests that a Design Guide is produced to better inform potential developers as to what is appropriate. Suggest there is an opportunity to reiterate the importance of a sense of place. Para 9.39 add ' <i>and character</i> ' after 'protects local distinctiveness' in the third line. Suggest a point needs to be made that local distinctiveness does not include the current bland stock of houses built by large developers.
Our Design	156	Transition Tavistock and SW Devon Community Energy Partnership consider that this section is very weak on the environmental

		and sustainable front. It is also confusing that it doesn't refer to energy. There should at the very least be a cross reference to Our Resources.
Our Design	156	Transition Tavistock and SW Devon Community Energy Partnership considers that this section seems to exclude, ignore or at least significantly weaken much of the valuable consultation evidence and findings from the Callington Road development, which is disappointing.
Our Design	156	Transition Tavistock and SW Devon Community Energy Partnership suggests Our Plan should include the urgent need to put in place an independent design panel that meets regularly and helps assess the sustainability of development across the area.
Our Design Para 9.39 – 9.40	72	Devon and Cornwall Police Authority notes that Our Plan does not make any reference to Design and Access Statements (which can include measure to design out crime, disorder, antisocial behaviour, conflict and crime prevention measures) to ensure a developer will consider these.
Our Design Para 9.40	72	Devon and Cornwall Police Authority suggest adding text in red to '... Crime, the fear of crime, antisocial behaviour and conflict are important issues ...' Within this section refer to the role of the Police Architectural Liaison Officer in providing advice on designing out opportunities for crime, antisocial behaviour and conflict within the built environment' to ensure communities are safe, secure and opportunities for antisocial behaviour and conflict are minimised.
OP43 (Design)	72	Devon and Cornwall Police Authority suggest adding text in red to criteria (g) 'Promote safe and user friendly environment and reduce opportunities for crime, the fear of crime, antisocial behaviour and conflict '.
OP43	96	Sourton Parish Council welcomes this policy for development that is in keeping with the local character as well as the recognition of the importance of providing a space that people feel comfortable in and making a development a place where people want to be.
OP43	132	This policy appears to miss the opportunity to reinforce other objectives e.g. food growing space (not just gardens), micro-generation schemes best done at the design stage (e.g. ground source heating).
OP43	156	Transition Tavistock and SW Devon Community Energy Partnership considers that new development should also accommodate community growing space and not just a reasonable amount of garden (criteria j).
OP44 (General Amenity)	132	Agrees with policy approach and would note that the policy could be wider e.g. impact on green space.

Our Heritage

Policy/Para/ Section	Rep no.	Key Issue(s)
Our National and Local Heritage Para 10.7	153	Reflect recent change in name of organisation spitting into English Heritage (a trust) and Historic England (retaining statutory function for Local Plans)
Our Heritage and all proposals e.g. OP9	151	Welcome 'Our Heritage' section re. designated and non designated heritage assets but suggest this should be better reflected in proposals e.g. OP9
OP45 (Historic Environment)	44	Suggest adding an additional statement to the fact that the character of WDBC is not bland and that volume house builder designs are often 'alien' in this part of the world.
OP45	59	The National Trust welcomes the protection given to national and local heritage assets in line with national policy.
OP45	59	The National Trust refers to Inspector's Report into the Examination of Mid Devon Local Plan Part 3 – Development Management Policies (July 2013) policy on development affecting Heritage Assets found unsound. Inspector emphasised need to reflect the positive approach set out in paragraph 126 of NPPF: <ul style="list-style-type: none"> • Emphasising desirability of new development making a positive contribution to local character and encouraging enhancement of local distinctiveness • Refer to systematic approach to assessment of proposals affecting setting (refer: English Heritage 'The setting of Heritage Assets') NT wish to see clarity on need for systematic assessment of development affecting setting of heritage assets, following up to date best practice guidance.
Our Heritage	151	Devon Archaeological Society suggests that Our Plan should protect non designated mining and other archaeological assets as appropriate to their significance, or preservation record.
OP45	153	Historic England consider this policy is sound.

Our Resources

Policy/Para/Section	Rep no.	Key Issue(s)
Our Resources	44	Questions whether WDBC will enforce the zero carbon requirements. Considers that every new build should have solar panels installed and orientated to maximise solar efficiency.
Our Resources Our Low Carbon Future	96	Sourton Parish Council suggests that it should be a requirement that zero carbon targets are attained by developers to ensure that every house is energy efficient, if not “passive”. This does not seem to be a requirement at present, just an option.
Our Renewable Energy Para 11.14	132	Disappointed with the statement regarding ‘there is debate about the extent to which change is due to rising carbon emissions’ and do not feel WDBC should be giving space to this viewpoint fuelled by campaign groups.
Our Resources??	164 LATE	The Environment Agency suggest that the climate change considerations should include increases in river flows and rainfall intensity as these are more relevant in West Devon than sea level rise.
OP46 (Low Carbon Future)	75	The policy aims appear to vague and wide-ranging and will be difficult to enforce and to implement, strict application could prevent development proposals coming forward. Suggest aims should be included in objectives or supporting text where they would have less weight in decision-making.
OP46	132	Agrees with policy approach but in contrast with other policies, the tone is considered to be weak and lacks a sense of ambition to lead rather than do something token.
OP46	156	Transition Tavistock and SW Devon Community Energy Partnership consider that this section is very weak on the energy performance of buildings. Any new development should include district heating. There is no justification for individual heating provision in properties in this day and age.
Para 11.7	156	Transition Tavistock and SW Devon Community Energy Partnership feel that WDBC should not ‘seek’ to be involved in determining allowable solutions but should insist on being involved. Transition Tavistock and SW Devon Community Energy Partnership have the capacity and capability locally to develop viable options for affordable solutions based around community energy generation and energy saving and community land trust type developments.
OP47 (New Development and Sustainable Energy)	37	Milton Abbot Grouped Parish Council supports the policy, but notes that it is unclear whether failure to meet the Borough Council’s ‘expectations’ carries any sanctions. The Parish Council appreciates that WDBC can only operate within the provisions of relevant statutes, but would like to see either the substitution of ‘required’ for ‘expected’ if that is possible. If not, an indication of the consequences if the Borough Council’s expectations are not met.
OP46&OP47	57	There needs to be more recognition given to the merits of Low Impact Development, particularly the responsible use of building materials and consideration given to how the building will be used by those living in it, rather than mass developed housing where standards are driven by cost for the developer, and not by the costs for the long-term user.
OP46&OP47	96	Sourton Parish Council consider that with regards to housing standards, more needs to be done with regard to optimising orientation etc
OP46&OP47	96	Sourton Parish Council consider the way that RE policy is worded seems to imply a ‘presumption of approval’ for all renewable

		energy projects. Priority should be given to small-scale projects before any large scale projects are justified.
OP46 & OP47	131	These policies are not compliant with Ministerial Statement 25 th March 2015 concerning zero carbon homes and housing standards, with reference to water usage and carbon emissions (OP46) and 10% renewable/low carbon energy (OP47).
OP47	132	Agrees with policy approach but would suggest this policy only appears to be echoing a national standard that is at risk with a change of government rather than aspiring for the best for the residents of West Devon.
Para 11.9	156	Transition Tavistock and SW Devon Community Energy Partnership suggest this paragraph should include reference to SWD CEP Strategic Energy Study undertaken but the same organisation in 2013 to inform policy. Transition Tavistock and SW Devon Community Energy Partnership also note that there is no reference to the SWDCEP in all of the Plan.
Para 11.10	156	Transition Tavistock and SW Devon Community Energy Partnership consider the point about local communities 'fear' is overstated. This section should also include reference to the Industries Best Practice Guidelines for developing renewable projects as developed by RegenSW.
Para 11.13	156	Transition Tavistock and SW Devon Community Energy Partnership are unsure whether the requirements are national policy or the implications of them. If they are not, then this should leave open the opportunity for much stronger statements around some of the other policy areas.
Para 11.15	156	Transition Tavistock and SW Devon Community Energy Partnership consider that climate change is already having an impact on West Devon and this point should be included.
OP48 (Renewable and Low Carbon Energy (including heat))	37	Milton Abbot Grouped Parish Council's comments to OP38 apply equally to policy OP48 in that it does not contain any reference to an objective assessment of the impact of RE development on LCTs. The Parish Council also consider this policy is weak and subjective insofar as any assessment of the impact of residential amenity is concerned. The outcome of the application of the proposed residential amenity impact by an RE developer will be a subjective debate. A more objective test needs to be developed of the effect on residential amenity of proposed wind turbines e.g. an acceptable distance of a dwelling from a turbine, determined by the height of the blade tip and offset by any screening or masking effect. The sensitivity of the landscape and the impact on it of the proposed development is a separate issue. The Parish Council suggest there is a clear need for a better process than the one contained in OP48, which leaves developers to assess the impact of their own developments. The PC note that a distance test has already been introduced by another authority with several similar circumstances, although acknowledge this may not be the right approach for the Council. The Parish Council therefore objects to the omission of an objective test of the impact of the wind turbine development on residential amenity in policy OP48.
OP48	99	The respondent considers that the visual impact of turbines has not been sufficiently considered.
OP48	99	The respondent considers that the option of using water power has not been sufficiently considered.
OP48	103	Natural England note that it is often difficult to maintain agricultural use during the course of some renewable energy schemes such as solar panels. These schemes should therefore avoid best and most versatile agricultural soils. This should be included within criteria (e).

OP48	150	Dartmoor National Park Authority suggest clearer and more consistent wording for criteria (c): “Development will not be permitted which would damage the setting, natural beauty, character and special qualities or prejudice achievement of the designed purposes of AONBs and the Dartmoor National Park”
OP48	150	Concerned about the inflexibility of reference to a specific advice note within a policy. It is suggested that the policy has a clear reference to satisfying all other relevant policies in the development plan
OP48	154	Can Parishes have more input on residential amenity assessments, and offer additional conditions/requirements?
OP48	156	Transition Tavistock and SW Devon Community Energy Partnership make the following points: <ul style="list-style-type: none"> - Question criteria (g) and how it aligns to community energy developments and generating to fulfil a community need. - Unsure of the implications of criteria (i). Considers there should be no development which isn't based on district heating and ideally renewable heat. Question whether the potential of renewable heat is really understood. - Questions what is meant by unsustainable in the context of criteria (j)
OP47 & OP48	153	Historic England consider this policy is unsound. The impact of renewable and low carbon energy has potential to cause significant harm to the historic environment (setting of conservation areas or other assets, listed buildings etc). NPPF sets out policies to protect and conserve the historic environment and in para. 97 that in promoting use of this type of energy local authorities should ensure its policies satisfactory address the adverse impacts, including cumulative and visual, and state what criteria are used to achieve this. Our Plan policies lack appropriate mention (and this includes ‘compromise the purpose’ in OP48) that the benefits of renewable energy sources should be appropriately balanced against the harm and impact on the natural and historic environment. Make clear that applicants should fully understand heritage significance and impact of scheme on wider setting. Suggested change: ‘Proposals must safeguard and where appropriate enhance historic assets and their settings’ and explain in preamble the need for this consideration.
OP48	121	It is noted that each of the criteria a) to h) must be satisfied if an application for renewable energy development is to be granted planning permission. This approach is only effective where every individual criterion is sound. In this instance, there are concerns around three of the criteria: It is suggested that criteria (e) is too inflexible. Amended wording is proposed, suggesting that ongoing co-use only be required ‘where feasible’ and that ‘farmland should be returned to agricultural use following decommissioning’. <i>“(e) Where possible, any farmland that is used is retained in some form of agricultural use. If this is unfeasible for any reason, the farmland used will be returned to an agricultural use following decommissioning of the renewable energy installation.”</i> It is suggested that criteria (g) is unnecessarily restrictive, and could be interpreted as precluding any commercial development that generates a greater level of energy than can be consumed by nearby businesses. It is suggested to remove this criterion. It is suggested that criterion (h) may result in duplication, as larger schemes would be subject to Environmental Impact Assessment in which there is a requirement to examine residential impact as part of the Environmental Statement.

		<i>“(h) With specific relation to wind turbine proposals below the EIA threshold, and additional Residential Amenity Assessment may be required for schemes that are in close proximity to residential dwellings. In this respect, each application will be judged on a case by case basis.</i>
OP48	132	The phrasing of clause (g) would seem to suggest that renewable energy development is only allowable to meet on site business use. This is not in accord with the narrative or common sense. Would like to see a supportive policy.
OP48	150	Dartmoor National Park Authority are concerned by the potential inflexibility of reference to a specific advice note within a policy. As such, suggest that within the policy a clearer reference is made to the need for the proposal to satisfy all other relevant policies within the development plan.
OP48	150	Dartmoor National Park Authority suggest a clearer and more consistent wording would be of benefit to clause (c) and consistent with earlier comments: <i>“Development will not be permitted which would damage the setting, natural beauty, character and special qualities or prejudice achievement of the designated purposes of AONBs and Dartmoor National Park.”</i>
Our Resources Our Renewable Energy	96	Sourton Parish Council notes the wording in Our Plan that “the government requires all councils to show a positive approach to renewable energy”. However, the Parish Council is concerned that this may lead to a presumption of approval of any renewable energy project and it is noted that it is possible to support energy from renewable and low carbon sources without feeling the need to accept the unacceptable. The Parish Council would therefore like to see the section under “Our Renewable Energy” reworded so that smaller and roof-top projects are given priority, and that only where no small scale project is possible in the area will large scale projects be considered.
Para 11.17	156	Transition Tavistock and SW Devon Community Energy Partnership suggest this should include reference to the fact that community acceptance is increased. Would also like to see addition to the paragraph that a community ownership and/or involvement component is encouraged for all renewable energy (heat and generation) proposals
OP49 (Community Energy)	103	Natural England note that community energy schemes can still lead to unacceptable impacts including landscape impacts. NE advise that the same criteria in OP48 should apply to this policy.
OP49	132	Agrees with policy approach.

General

Policy/Para/Section	Rep no.	Key Issue(s)
Our Plan	124	Congratulations on a document that is well written, clear and logical
Our Plan	151	Devon Archaeological Society welcomes the protection, enhancement and enjoyment of West Devon's historical environment.
Annual Delivery Plan (ADP)	91	Devon County Council suggest that there should be a broader environmental objective given significance and extent of WD's cultural heritage. Many themes (e.g. open space and recreation) are linked to management of historic/cultural environment (conserve, enjoy and enhance).
Page 105 (Key Diagram)	150	Dartmoor National Park Authority suggest that the key diagram is amended as it is at risk as being interpreted that WD are proposing a Strategic Employment Area within the National Park, south of Okehampton.
Page 119 (Hatherleigh Map)	56	Hatherleigh Town Council considers the scale of the map is too large and does not represent an overview of the town and does not give the best view to consider future development opportunities e.g. development opportunities to the north of the town.
Glossary	164 LATE	<p>The Environment Agency agree with the definition of Critical Drainage Areas (CDAs). However, the CDAs for West Devon are not published on the Environment Agency's GOV.UK website. As such, it would be useful to include a list and/or a map of the CDAs within the plan.</p> <p>The Environment Agency also notes the definition for Functional Floodplain (also known as Flood Zone 3Bb) and agree with the definition. However, these areas will have to be identified as part of a level 2 SFRA in consultation with the EA.</p>
General	21	Considers that jobs are needed before any more houses are built and questions what the Council will gain economically from building new properties.
General <i>Hatherleigh</i>	56	Hatherleigh Town Council already considers the wishes of local residents have been set aside by WDBC in determining the Hatherleigh Market application which included 116 new homes, against the Community Plan which stated a limit of 105 homes with no more than 80% (around 84 houses) on a single development.
General <i>North Tawton</i>	161	<p>North Tawton Town Council responded as follows:</p> <ul style="list-style-type: none"> - the importance of new employment land in the town - the partial removal of settlement boundaries - clarifying the position with regards to the minimum planned requirement for the town and the relationship with the development of the Woollen Mill.
General <i>Okehampton</i>	99	The respondent notes that in Okehampton the conflict between local shops and out of town facilities needs to be avoided or it could create demise of the town centre.
General <i>Okehampton Hamlets</i>	126	<p>Okehampton Hamlets Parish Council offer the following comments:</p> <ul style="list-style-type: none"> - Maintain and enhancing the infrastructure should come before the development of a large number of houses; - The development of employment opportunities should come before the large residential developments; - Higher priority needs to be given to recreational/open spaces (including sports fields) than in the past; - The replacement site for Parcel 4 to the east of Okehampton should be identified by the Neighbourhood Plan being
Our Plan	Publication Version	developed by Okehampton Town and Okehampton Hamlets Councils.

General <i>Tavistock</i>	23	There will be a real challenge to deliver betterment for the traffic flow through Tavistock (Ford Street/Spar shop Roundabout, Drakes roundabout – Pixon Lane roundabout) in order to support the new housing developments on that side of town.
General <i>Tavistock</i>	95	Support the area around Lifton to create a new town rather than continuing to expand Tavistock. Against Greenfield development except in exceptional circumstances, development should go on brownfield sites. Against development on greenfields at Anderton Lane as this is an important wildlife area and green corridor/buffer between Tavistock and Whitchurch. Concern about loss of trees and support policies to protect them. Improve walk and cycle routes and pedestrianise more of Tavistock. Should have a park and ride.
General <i>Tavistock</i>	139	<p>The documentation has been much easier to understand but the website is confusing. Consultation has been small scale and not well publicised</p> <p>Housing. Regrettable that large amounts of housing are being forced onto the main towns in this rural area, many of which will end up as homes for commuters to Exeter and Plymouth. Pleased that development will take place in rural villages. Regrettable that development mainly take place on greenfields but pleased that high flood risk and areas of local landscape value have not been included.</p> <p>Infrastructure. Local road network, schools and hospital are all at capacity. A limit on future growth in Tavistock should be set and development should be located elsewhere for example in a new community near the A30. There should be proper provision to maintain local roads, signage, verges, drains and ditches through an equivalent to the Parish Lengthsman Scheme to benefit public safety and flood prevention.</p> <p>Environment – WD is a special and beautiful rural area and should not be subject to urban housing targets and consequent loss of agricultural land and damage to its important landscape value. It should not be subject to any more large and dominant wind turbines. Wildlife should be protected and development on floodplains should be avoided.</p> <p>Heritage – WHS should be properly taken into account and all historic mining relics and areas of activity should be identified and protected from inappropriate development.</p> <p>Resources – No more large wind turbines. Encourage installation of solar pV panels on roofs of industrial, agricultural and domestic buildings.</p>
General <i>Age Structure</i>	99	The respondent considers that the Plan does not take into account age structure in terms of the release of housing over time as an increasing elderly population dies out.
General <i>Housing and infrastructure</i>	99	The respondent considers there has been insufficient consideration to conflicts arising from increased housing and population leading to increased road usage, particularly at key times around primary schools
Consultation arrangements	31	There was no information about Lamerton at the consultation and the ability of infrastructure to accommodate new development.

Consultation arrangements	32	Would liked to have seen more information about the areas around Lamerton and Milton Abbot and what the Council is actively pursuing to safeguard the AONB and what measures will be introduced to stop unlawful development.
Consultation arrangements	47	Bere Ferrers Parish Council are unhappy with consultation process, particularly: <ul style="list-style-type: none"> • Town & Parish Council Workshop too rushed • 6 week informal consultation over Christmas • Formal consultation – hard copies only available at Council offices, hard copies should have been sent to all Parish Councils and Libraries as Broadband speeds slow in rural areas
Consultation arrangements	122	Okehampton Town Council felt that the consultation was not user friendly. There was no introductory setting for Our Plan and much of the content was about Tavistock. The documents were not easily accessible and the lack of available copies of Our Plan hampered easy reference.
Check if this is about Oke or Tavistock?? <i>Email sent 24/04 requesting clarification on area</i>	1	Concerned at lack of mention of additional parking facilities in the town, particularly with 200 new homes a year. Suggests a multi-storey car park opposite the former Somerfields. Also notes that there is no mention of a possible P&R scheme for people coming into the town. A continuous bus service in and out of the town and free parking at both ends would be an excellent way of tackling additional traffic.
General	2	Concerned with the lack of dog bins in Bere Alston.

Evidence

Policy/Para/Section	Rep no.	Key Issue(s)
Evidence	81	Highways England is concerned by the lack of a transport evidence base.
Development Strategy Topic Paper	131	Council should apply 20% due to recent lower housing delivery and windfall allowance not justified. Council should reconsider its 5 year land supply before submission.
GI Framework 2.1.1	77	2.1.1: Objectives SOCIAL: Improving Access to Green and Blue Spaces and Supporting Healthy Lifestyles DCAF is not confident that the term multi-user (i.e. routes available for all users – walkers, cyclists, horse-riders, dog walkers, and people using wheelchairs, mobility scooters or buggies) is being used in this context. In the Green Infrastructure Framework it would appear to refer mainly to routes used solely as footpaths and cyclepaths.
GI Framework 2.3.2	77	2.3.2: Background – Recreational Paths and Sustainable Travel Links Descriptions of the NCN routes do not mention that these are available to other users such as walkers, dog walkers and those using mobility vehicles. Nor does it mention that some sections of the NCN, for example between Lydford and Southerly Down, are open for horse riders.
GI Framework 2.3.2:	77	2.3.2: Background – Recreational Paths and Sustainable Travel Links NCN 27 is referred to as a multi-use route. The term multi-use is being used to classify walking and cycling routes. Multi-use, as used within Devon County Council and other authorities, means a route suitable for walking, cycling, horse-riding and for wheel chair or mobility scooter users and buggies. DCAF strongly advises that the terminology used in the GI Framework should be amended accordingly to avoid confusion. Some trails are multi-use, for example from Lydford to Southerly Down on the Granite Way, the Pegasus Way and the Ruby Way. It would be helpful to distinguish between different types of route.
GI Framework 2.3.5	77	2.3.5: Related Projects – Granite and Gears The introduction states that the project is working to create family friendly multi-use routes. DCAF advise that not all projects are multi-use and these should perhaps be differentiated.
GI Framework 2.3.6	77	2.3.6: Strategic aims and actions – aim AHR4 Landowners are not mentioned as a key partner yet they provide the permissive access opportunities
GI Framework 2.3.6	77	2.3.6: Strategic aims and actions – aims AHR6-9, AHR15, AHR18 The strategic aims and actions table fails to distinguish between aims which can reasonably be undertaken by landowning organisations and aims which do not fall within their role

		<p>For example actions AHR6-9 make statements about landowning organisations promoting, providing or carrying out various initiatives which do not fall within their remit. It is important for WDBC to consult all landowning organisations such as the NFU, CLA, Tenant Farmers' Association and smallholders' organisations to ensure that statements can be supported.</p> <p>Whilst landowning organisations might encourage members to engage with processes in a particular way, or may get involved in wider policy, their resources generally do not extend to promotion of green space or physical improvements.</p> <p>Similarly in the section related to play and outdoor space AHR15 and AHR18, it is unrealistic to anticipate that landowning organisations will create or enhance play spaces or opportunities for sports events. It is noted that landowning organisations were not consulted during the informal consultation earlier this year, although specific member-based organisations which own land parcels, such as the Devon Wildlife Trust and Woodland Trust, were included. It is possible such organisations would be able to take a more active role.</p>
GI Framework 2.3.6	77	<p>2.3.6: Strategic aims and actions – blue space</p> <p>Additional blue space key partners should be identified, for example South West Lakes Trust</p>
GI Framework 3.1.2	77	<p>3.1.2: Opportunities in relation to development (Tavistock)</p> <p>Proposed cycle trail between Tavistock and Tamar Trails Centre. The DCAF advises that the Council should aspire to make this a multi-use route.</p>
GI Framework 3.1.2, 3.2.2, 3.3.2, 3.4.2, 3.5.2; 3.6.2	77	<p>Opportunities in relation to development (Tavistock, Okehampton, Bere Alston, Lifton, Hatherleigh, North Tawton)</p> <p>Reference is given to providing linkages to the local Public Rights of Way network, cycle network and key strategic walking and cycling routes. DCAF advises that extending access for all users through multi-use opportunities should be pursued, where practical.</p>
GI Framework 3.1.2, 3.2.2, 3.3.2, 3.4.2, 3.5.2; 3.6.2	77	<p>Opportunities in relation to development (Tavistock, Okehampton, Bere Alston, Lifton, Hatherleigh, North Tawton)</p> <p>Reference is given to provision of multi-use paths within development sites and provision of multi-use paths linking development sites with other areas. The definition of multi-use is unclear.</p>
GI Framework 4.1	77	<p>4.1: Delivery</p> <p>The crucial and important role of individual landowners and managers is not included in this list.</p>
GI Framework - General	77	<p>Consultation with landowners/managers</p> <p>Failure to recognise that landowners and managers are instrumental in enabling green infrastructure to be extended or enhanced. Early consultation with landowners therefore vitally important but given an insufficiently high profile in the GI Framework and Our Plan.</p>
GI Framework - General	77	<p>Management and maintenance</p>

		Our Plan and the GI Framework need to ensure a balance between green infrastructure aspirations and having realistic expectations of meeting those objectives. Otherwise the Plan risks failing to meet expectations of local residents.
GI Framework - General	77	<p>Deficiencies</p> <p>When assessing deficiencies in the provision of green infrastructure it is important to take an overall look at the proximity of all available recreational opportunities including public rights of way, permissive paths, cycleways and multi-use trails, unsurfaced unclassified County roads, forestry and woodland and areas of access land and green space. This would enable a comprehensive strategy to be developed to improve opportunities in areas of deprivation.</p>
GI Framework – Appendix 2	77	<p>Appendix 2 – Green Infrastructure Checklist for Developers</p> <p>“Have sustainable transport and recreational between...” - missing word after recreational highlighted.</p>
Habitat Regulations Assessment (HRA)	103	<p>Effects of Development on the Tamar Estuary SPA</p> <p>Natural England note that the HRA notes the coincidence of an important avocet roost and Weir Quay on the Bere peninsular where the only public quay is available. We note that the major boating activity takes place outside the most sensitive time of year. We advise that non-powered boats also have the potential to disturb birds as they are able to access shallower water. Nevertheless we agree with the findings of the HRA that Likely Significant Effects cannot be ruled out and agree with the mitigation proposed to reduce effects to insignificant. These measures (education and interpretation) will need to be monitored to ensure they are appropriate.</p> <p>In addition, whilst impacts from development at Tavistock have been ruled out due to the distance from the developments to the roost sites it would be prudent to commit to further investigations to assess the zone of influence by visitor survey. However, if the proposed mitigation measures are sufficient it is unlikely that further measures will be needed.</p>
Habitat Regulations Assessment (HRA)	103	<p>Effects of Development on the Plymouth Sound and Tamar Estuary SAC</p> <p>Natural England note that given the distance from Weir Quay to the main eel grass beds, the main threat to the SAC is potentially from bait-digging. There is significant bait digging and other fishing which involves direct damage to the features already recorded. Limited access therefore appears of no consequence. Additional development may give rise to additional pressures. These are not recorded in the Habitat Regulations Assessment.</p> <p>It is considered that the mitigation measures proposed for the SAC would be similar to that required for the SPA although for different features. Additional evidence will be required to assess areas to be targeted.</p>
Habitat Regulations Assessment (HRA)	103	<p>Effects of Development on the Culm Grasslands SAC</p> <p>Housing and employment land development are unlikely to have an effect on the culm grasslands which are susceptible to air pollution. Certain agricultural developments such as poultry farms and open slurry lagoons in the wrong location give rise to Likely Significant Effects.</p> <p>Whilst the Plan does not propose any such development, Natural England recommend that additional policy wording is added to policy. This policy and text should be improved by highlighting the potential effect in the text and stating in the policy bullet point c that air quality assessments will be required for such development within 4km of the Site and to ensure development that would lead to adverse effect will be refused.</p>

Land Availability Assessment and Sustainability Assessment <i>Exbourne</i>	160	Supports acknowledgement that school site in Exbourne not capable of expansion. WD_08_02_08/13 and WD_08_06_13 Considers that the extra traffic generated by the development of the two sites will lead to traffic problems unless there are significant developer contributions to widen the road from The Shrubbery entrance to Avenue House. There is also existing car parking problems around the church and yellow lines may be needed to manage parking as a result of new development.
Land Availability Assessment <i>Lamerton</i>	23	The respondent makes comments on sites identified in the Land Availability Assessment as follows: Land behind Trenance Drive, Lamerton WD_44_08_08/13 Disappointing to see this land developed. Would impact on the character of the local area. Land should be used for agricultural use. St Johns, Lamerton WD_44_03_08/13 Some small scale development for units on the front of the site might be a logical infill. (4 units). Any further development would impact on the green triangle.
Landscape Character Assessment	96	Sourton Parish Council consider that this document needs to remain 'live' and not abandoned because it is challenged as being out of date.
OSSR Strategy Para 2.2	77	2.2 Natural Spaces <i>Natural spaces support many informal sport activities including cycling, orienteering, recreational walking, mountain biking, climbing and, on/along watercourses, fishing, sailing and canoeing. The Borough also benefits from long stretches of the Sustrans National Cycle Route, Regional Walking Trails and the intimate network of Greenways linking up many Natural spaces.</i> The DCAF advises that this list of activities does not include horse riding, an activity which has benefits for the economy of West Devon.
OSSR Strategy Para 2.3	77	2.3 Greenways <i>Greenways provide opportunities for pedestrian and cycle movement within towns and villages and links out into the surrounding countryside. In West Devon there is an extensive network of green lanes, public rights of way, and bridleways which spread out from the towns and villages.</i> The DCAF advises re-writing to include additional greenways. <i>....'In West Devon there is an extensive network of public rights of way (footpaths, bridleways, restricted byways and byways open to all traffic), cycle and multi-use routes, unsurfaced unclassified County roads and permissive paths which spread out from the towns and villages...</i>
OSSR Strategy /Playing Pitch	83	Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF) (formerly PPS12 and PPG17), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for

Strategy		<p>indoor and outdoor sports facilities, including playing pitches.</p> <p>It is crucial that the Council have an up-to-date and robust evidence base in order to plan for the provision of sport both playing fields and built facilities. Sport England would highly recommend that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work..... The evidence base for sport and recreation should directly link into the development of an Infrastructure Delivery Plan, CIL or planning obligations.</p>
Strategic Housing Market Needs Assessment (SHMNA) Setting Our Development Strategy Topic Paper Five Year Housing Land Supply Statement	89	OAN and 5 Year Land Supply fundamentally flawed and have led to incorrect basis for emerging policies. Documents relating to these should have been consulted on with the emerging plan.
Strategic Housing Market Needs Assessment (SHMNA) Setting Our Development Strategy Topic Paper	89	<p>The following key issues are raised:</p> <ol style="list-style-type: none"> 1. Council has criticised its own evidence (SHMNA) and the proposed number of dwellings is insufficient to take account of any allowance for market signals, affordable housing or alignment between housing and employment strategies; 2. Analysis of market signals and job-led projections is flawed and does not accurately reflect local circumstances leading to insufficient provision for future residential development. It has failed to address affordable housing needs as required by the NPPF, which has resulted in examinations of plans being suspended elsewhere. NLP has adopted a number of scenarios to test the housing requirements all of which suggest a higher target is appropriate.
Strategic Housing Market Needs Assessment (SHMNA)	123	As the SHMNA was prepared at an early stage of the economic recovery the Council should use the most up to date data to review housing targets to ensure will meet need and significantly boost supply.
Appendix 4 of the	56	Hatherleigh Town Council highlights a contradiction over future expansion of the primary school. Page 25 of “wellbeing” states that space is available on site for expansion yet the IDP (page 36) states the school is not capable of expansion. Seek confirmation of

Sustainability Appraisal and Infrastructure Delivery Plan		correct position. If the site is considered suitable for expansion, details are required on the capacity available.
Strategic Flood Risk Assessment (SFRA)	164 LATE	<p>The Environment Agency note that the SFRA has not referred to the notified Critical Drainage Areas (CDAs) for Tavistock and Okehampton and suggest this is updated.</p> <p>It should also be noted that the data for surface water flooding has been revised and therefore reference to the updated Flood Map for Surface Water (uFMfSW) should be included. Correct terms for external flood mapping products are Flood Map for Planning (Rivers and Sea), Risk of Flooding from Rivers and Sea, and Risk of Flooding from Surface Water. Guidance on their use has also been updated.</p> <p>The SFRA's appendices showing Flood Areas do not appear to be available. These should be updated with the latest mapping and should include the CDAs to make the constraints clear to developers.</p>
Sustainability Appraisal & Strategic Environmental Assessment (SA & SEA)	72	Devon and Cornwall Police Authority welcome reference to 'crime and fear of crime' but concerned that there is no mention of S.17 Crime & Disorder Act 1998 (provides legal framework for planning to consider preventing crime, disorder, antisocial etc behaviour affecting local environment (conflict). NPPF – 'create safe and accessible environments where crime and the fear of crime do not undermine quality of life or community'
Sustainability Appraisal	103	Assessment of OP5 is included as appendices these could be included as separate chapters of the main SA report.
Sustainability Appraisal	103	Welcome the site alternatives for Tavistock and the development strategy.
Sustainability Appraisal	103	The SA needs to record alternative options for both employment sites and the minimum spatial distribution for other settlements. Therefore, the SA in respect of Spatial Distribution and delivery of housing as set out in table 2 is in particular incomplete, as is the SA regarding employment sites as it has not taken into account the growth scenario and there is a lack of employment site alternatives.
Sustainability Appraisal	124	Reiterate comments on the evidence base from January consultation. Namely SA of options for locating development, for example, it should not be assumed the 200 dwellings are needed in Tavistock.
Sustainability Appraisal <i>Exbourne</i>	125	<p>Appendix IV SA – Minimum Planned Requirement for Exbourne is considered to be excessive (state it is 15% increase) and wasn't discussed with the PC and the wider community were not consulted. Settlement appraisal does not adequately consider the impact of the additional development.</p> <p>Our Communities There is concern that further development would not maintain and strengthen local distinctiveness and sense of place and the opposite is true. Concerned that new development would undermine existing character with the construction of a disproportionate number of dwellings on Greenfield sites.</p>

		<p>Our Homes It is unclear whether new housing in Exbourne is actually needed, and previous Housing Needs Surveys identified a very low level of need.</p> <p>Our Economy Agree with the conclusion that there are minimal employment opportunities in the parish and that any significant economic impact is unlikely to be local.</p> <p>Our Wellbeing The respondent cannot see how a further 20 homes will have a positive impact on the health and well-being of the local economy. Exbourne was not designed for the car and further development would have a negative effect on sustainable transport options and increases traffic. The only potential improvement might be to social interaction in public places, although equally there are concerns about the impact of an increased population on local services and facilities.</p> <p>Our Nature Development on the scale proposed will not conserve or enhance the quality of landscape character or conserve and enhance biodiversity and in fact will have a negative impact on both these areas, particularly since that development sites have been identified in areas of existing grade 2 agricultural land or in the Conservation Area.</p> <p>Our Resources Agree with the analysis.</p> <p>Our Heritage An additional 21 dwellings is likely to have a detrimental impact on the cultural and historic environment. Concerned that new development will be out of keeping with the historic landscape and have a negative impact on the Conservation Area.</p> <p>Conclusion Questions whether there is an error in relation to the conclusion that the proposed level of development performs well against the Our Nature objectives. Urges the Council to reduce the minimum planned requirement to a more sensible and sustainable level.</p>
Sustainability Appraisal	164 LATE	The Environment Agency supports the conclusions of the Sustainability Appraisal (Appendix V) and recommend that these comments are incorporated into the plan where relevant.
Understanding Our Objectively Assessed Need Topic Paper	99	The respondent notes that the demographic profile of the population increase is not specified i.e. proportion retirees, working people etc...
Understanding Our Objectively Assessed Need Topic Paper	128	Inspector in Core Strategy commented that HMA showed levels of need exceeding the RSS target and that 2003 DCLG projections suggested a higher projection than RSS. Council should use updated household projections released 27 th Feb 2015.