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Alison Young

Bridestowe and Sourton Neighbourhood Plan Steering

Group

BY EMAIL ONLY

2/03/18

Dear Alison

**West Devon Borough Council and Dartmoor National Park Authority joint
response to the draft Bridestowe and Sourton Neighbourhood Plan Regulation 14
Consultation**

Thank you for sending the Draft Bridestowe and Sourton Neighbourhood Plan to the Local Planning Authorities (LPAs) for comments. This will be referred to as 'the plan' or 'the NP' in this document, which forms the joint response of the two LPAs for the Bridestowe and Sourton Neighbourhood Plan area, namely West Devon Borough Council (WDBC) and Dartmoor National Park Authority (DNPA).

The LPAs fully support the initiative for the Neighbourhood Planning Group to produce a Neighbourhood Plan (NP) and recognise that much work has gone into the development of the plan with extensive community involvement. The LPAs commend the Bridestowe and Sourton Neighbourhood Plan Group for all the hard work already put into the plan.

These comments have been provided to assist the NP Group in producing a Draft Neighbourhood Plan for submission to the LPAs at Regulation 15. The response is based on the information provided and available at the time of reviewing the plan, which includes the draft plan.

The LPAs have made a number of suggestions for further consideration prior to submission of the plan to help ensure it is successful at examination and contributes to a strong planning policy framework for the Bridestowe and Sourton.

Key comments on the overall plan are:

1. **Conformity with the Development Plan and meeting the Basic Conditions.** As you are no doubt aware, one of the 'basic conditions' that neighbourhood plans must fulfil is to be in conformity with the strategic policies of the Local Development Plans that are extant at the time of the examination of the NP. For West Devon, this is currently the Local Development Framework, including the 2011 Core Strategy and associated documents, except where this is out of date and the NPPF takes precedence. However, it is possible that emerging policy will be adopted by the time of the NP examination as the Plymouth

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and South West Devon Joint Local Plan (JLP) is currently being examined and is expected to be adopted in 2018. If this is the case, the plan should reference the JLP rather than the Core Strategy. These comments therefore assume that the JLP is the relevant Local Development Plan for the Bridestowe and Sourton NP. A list of strategic Development Plan policies is included as Appendix 1 to this letter. For Dartmoor National Park, the relevant strategic policies are contained within the Local Development Framework Core Strategy Development Plan Document 2008 and the Development Management and Delivery Development Plan Document adopted July 2013, referred to as the Dartmoor Local Plan in this document. A list of strategic policies for Dartmoor are published on their website and are included at Appendix 2. The DNPA is currently in the process of reviewing its Local Development Plan, with examination and adoption anticipated to happen during 2019/2020. The first draft Local Plan is likely to be published in September 2018 and will include revised strategic policies which will likely affect the strategic context for this neighbourhood plan.

2. It is clear that thorough consultation and research has been undertaken: Chapters 1 to 4 draw out some key issues for the local community and clear objectives for the plan. However, no site allocations have been made and this appears to be a missed opportunity to deliver local development that would help meet these objectives. Possible development sites have been mentioned in the plan, but their status is unclear. While an NP can be used to set out community opinion on development sites, it is not certain how much value this has, as without proper site allocations in the plan, very limited weight can be given to the community views given.
3. A development boundary around Sourton is identified on a map, but its status is unclear. There appears to be no policy that relates to it. As a matter of general principle, this is unlikely to be supported by the Council given that Sourton has not been identified as a sustainable place for development by the JLP or the DNPA Local Development Plan. Without the boundary, Sourton would be considered 'countryside', and subject to JLP Policy TTV31 and DNPA Policy COR2 which allows for only very limited development in special circumstances. In contrast, the principle of development within a development boundary is assumed to be acceptable. Development outside the boundary may also be acceptable in accordance with JLP TTV30 and TTV31. So it is difficult to see what benefit a development boundary around Sourton is likely to achieve.
4. **Evidence base.** No evidence to back up the proposed policies has been seen by the LPA. Appendices are mentioned in the plan but these did not appear to be available on the Bridestowe website at the time of the consultation. It is important to ensure that all relevant background evidence is readily available by the time of submission at Reg 15, particularly for those policies that are not given strategic context through the JLP or Dartmoor Local Plan.

Comments on specific parts of the Neighbourhood Plan

Section, policy or text	Comment
Chapter 1. Introduction and background.	This chapter provides a useful profile of the Neighbourhood Area and the background to the plan.
Para 1.5.5, Fig 3 and Fig 5	While sites proposed by developers in the NP area may be useful background information, there is no information about how, when or why these sites have been proposed and their status is therefore unclear. Suggest removing this list of sites and the maps in Figs 3 and 5 to a background document.
P.11 'Sourton village had no settlement boundary at the commencement of this Neighbourhood Development Plan, but this was addressed by the Parish Council in July 2016 and a boundary drawn up and adopted.'	Who was the development boundary adopted by and what was the process? While the LPA is generally supportive of minor changes to existing development boundaries within neighbourhood plans, drawing a new development boundary around a settlement that has not been identified as a sustainable place for development by the Local Plan raises issues as discussed in the general comments above.
Para1.5.8 Why the Landscape is important	Reference to National Park designation recognising nationally important landscape quality would seem appropriate here
Chapter Two: Planning Policy Context: What is a Neighbourhood Development Plan?	This is helpful background information.
P.16 'The National Policy Planning Framework (NPPF) provides current advice from the Government on Planning Policy and potentially supersedes policies contained within some of the older local planning documents.'	Suggested rewording: 'The National Planning Policy Framework (NPPF) sets out national planning policy which all local planning policy must have regard to.'
P.16 'Plymouth, West Devon and South Hams are currently preparing a Joint Local Plan which is anticipated to be finalised and adopted in late 2017'	Adoption is now likely to be late 2018. As discussed in general comments above, the emerging JLP is considered the most relevant Local Development Plan in terms of the Bridestowe and Sourton NP. It would therefore be useful to have here an explanation of the most relevant JLP policies, especially TTV30 and TTV31.
P.20 'West Devon Borough Council (WDBC) in its emerging draft strategic core-planning document (prepared jointly with Plymouth City Council and South Hams District Council) has allocated a figure of 30 additional homes to be built in Bridestowe for the period 2014 – 2034.'	Policy TTV30 sets out indicative levels of new housing that is expected to come forward through neighbourhood plans at villages identified as sustainable locations for development. The numbers suggested are primarily for monitoring purposes: if it is found that this level of housing is not coming forward through NPs, the council will consider identifying development sites at these villages. Suggested rewording: ' <i>West Devon</i>

	<i>Borough Council in its emerging Local Plan etc.....has suggested that a figure of 30 additional homes Bridestowe for the period 2014 – 2034 would be considered sustainable.'</i>
P.22 'Although the response rate to the questionnaire was higher than in most similar recent surveys, the actual level of housing needs identified in this survey must be considered to be a bare minimum requirement'	Agreed. You could also make the point that the assessed situation is only a snapshot in time and will change over the plan period.
P 22. 'Several specific sites for possible development, which had been put forward by the landowners were set out in the questionnaire and residents were asked their opinions on them' P.23 box ' The location of sites put forward in Bridestowe '	As above, where, when and how were these sites put forward? Presumably in the WDBC SHLAA, but this should be made clear.
P. 36 'Although several specific sites for possible development for Bridestowe fall outside the settlement boundary, they are adjacent to it. These sites must be considered as 'Exception Sites'; the NPPF states these sites must be used for affordable housing in perpetuity where normally housing would not be permitted.	JLP policy allows for development sites outside the development boundary in rural areas, provided it is adjoining or very close to existing settlements (Policies TTV30 and TTV31) and meets local development needs. There is no expectation that this housing will be 100% affordable. Therefore such sites cannot be considered 'Exception Sites'. This statement also seems contrary to your Policy H1
Housing Introduction	The statement that Sourton could still see development should land be put forward, seems to suggest this could mean Sourton is an acceptable location for development. This conflicts with Policy H2 and the strategic policies of DNPA.
Policy H1. Proposals for appropriate new housing development will be supported at a scale and in locations that accord with the NPPF, adopted policies for West Devon, Dartmoor National Park Authority and policies contained elsewhere in this Plan, where they support the continued sustainability and viability of communities in the Plan area by providing new homes, including but not limited to affordable and local needs housing to meet the objectively assessed local housing needs of the Plan area (Appendix IV).	Does this policy add anything to existing and emerging Local Plan policy, in particular JLP policies TTV30 and TTV31? Would suggest that this point can be made sufficiently in the introduction.
Policy H2. a. Proposals will be supported for housing developments outside the Bridestowe village development boundary subject to all the following criteria being met: 1. They are adjacent to the existing settlement boundary; 2. The proposed development contributes to meeting the local housing needs (as defined in section c below) within the relevant parish for	1. It may be worthwhile adding 'or near to' after adjacent to, as this is the approach taken in TTV31 and there may be sites very close to the settlement boundary, but not adjacent it, that the Parishes may wish to support.

<p>affordable and social-rented accommodation, which, for developments of more than 5 homes, constitutes a minimum of 30% of the proposed new dwellings or, for developments of 5 or fewer homes, an equivalent contribution towards the cost of such accommodation elsewhere within or adjacent to the Bridestowe settlement boundary (see H1);</p>	<p>2. This is not consistent with national policy, which requires a threshold of more than five for an off-site contribution and more than 10 for on site. Lower thresholds within a neighbourhood plan will need evidence to show that this is justifiable and deliverable.</p>
<p>Policy H 3. The following provisions will apply to all proposed housing development in the Plan area:</p> <p>1. Proposals should be supported by information proportionate to the scale of development to assess the impact of the development on the following:</p> <ul style="list-style-type: none"> • surrounding rural landscape or the landscape setting of any settlement in the Plan area; special and distinctive qualities of the local landscape or the Dartmoor National Park (as defined by the DNP Authority), and takes full account of the historical environment. • the local highway network, or on safety for pedestrians, cyclists, horse riders or other users. • land stability or drainage, and utilises sustainable drainage methods and sewage disposal; • surface or ground water quality, quantity or drainage; • risk of flooding; and flood measures should be included in the development to ensure that flood risk in surrounding areas is not increased in line with current Environment Agency regulations; <p>In addition, proposals should include measures to:</p> <ul style="list-style-type: none"> • minimise light pollution, particularly for developments outside or at the edges of existing settlements; • increase biodiversity and provide an evidence-based biodiversity action plan <p>3. Proposed new developments overall and individual components of those developments are in keeping with the site and surrounding landscape in terms of height, scale, massing, orientation and location within the site and are not unduly prominent in the local or wider landscape.</p> <p>5. The proposed development will not result in the</p>	<p>1. Information required with planning applications is set at national and district level and is set out in Local Validation Lists. It is not possible for a neighbourhood plan to require information in addition to these requirements. The wording of the policy is also problematic in that it seems to require that all development provide information, even where it might not be relevant to the proposal.</p> <p>WDBC are in the process of updating the Local Validation List. See https://www.westdevon.gov.uk/article/3283/Consultation-on-SH-and-WD-Local-Planning-Validation-List</p> <p>Second bullet point: It may not be reasonable to always expect developments to provide biodiversity enhancement. Suggest adding 'wherever possible'. Suggested additional wording: 'where possible harm to biodiversity is identified, the submission should include measures to mitigate the impact upon biodiversity.'</p> <p>3. We would recommend avoiding the words 'in keeping' as it could be considered to be overly prescriptive and to stifle innovation. Suggest something along the lines of 'new design should respond well to the surrounding environment and local distinctiveness'. Does this policy in general add anything to JLP DEV20? It also seems to largely repeat Policy H4.</p>

<p>loss of or harm to the character, setting or amenity value of existing public open or green spaces; where such adverse effects are likely to occur, the development will be supported only if the community will gain equal or greater benefit from provision of a suitable replacement as part of the proposed development.</p>	<p>5. The best way for a neighbourhood plan to protect valued green spaces is by designating them as Local Green Spaces. Has this been considered? Further information can be provided on this on request.</p>
<p>Policy H.4. All new housing developments in the Plan area must meet all the following criteria: a. Quality and design. All proposals for housing development will be designed to a high quality. Design which fails to have regard to local context and does not preserve or enhance locally distinctive character will not be supported. Development proposals, extensions and alterations to existing buildings and structures will be expected to:</p> <ul style="list-style-type: none"> • use traditional and vernacular building materials where appropriate to respect the context of the development concerned. • make efficient use of land while respecting the density, character, landscape and biodiversity of the surrounding area; • be suitably designed for the context within which they are set; • retain existing important landscape and natural features; • ensure that the scale and massing of buildings relate sympathetically to the surrounding area; • create safe environments addressing crime prevention and community safety; 	<p>As above, does this policy add significant value to JLP DEV20?</p> <p>a. The second sentence of this criteria in particular is negatively worded and potentially risks stifling innovation.</p>
<p>Policy H 5. Other than those changes of use allowed under Permitted Development, proposals for the conversion and re-use of redundant buildings both within settlements and in the open countryside for local housing needs, affordable housing, or live-work accommodation will be supported where all the following criteria are met: (Tourist accommodation is dealt with separately under E2). 1. The residential amenity of nearby residents is protected. 2. The conversion is designed to respect the scale, form, historic character, fabric, architectural features, design and setting of the original structure, maximising the re-use of existing materials. In addition: (a) To improve the thermal efficiency or utility of the building in its new role small changes to</p>	<p>This policy appears to support the conversion of any building (modern and traditional) in the countryside into housing, regardless of its location or merits. Is this what the NP group intend? It is not difficult to stop using a building and present it to the LPA as redundant. We recommend that the policy refers to NPPF para 55, as to the need for enhancement of the site in such cases. Or include a caveat such as '<i>where the long term redundancy of the building has been evidenced</i>' Under section 1. It is sometimes very challenging to totally protect neighbour amenity, and in many cases there is a low level of tolerable harm to neighbour amenity. As such we would recommend the insertion of the word 'adequately' before protected.</p> <p>a) This sentence is a concern as, generally, the LPA is resistant to extensions on historic barns in</p>

<p>the footprint or profile of the building (e.g. the addition of a porch where appropriate) will be permitted.</p>	<p>principle. A porch, for example, can be a very harmful addition to an historic barn. We would suggest removal of this part of the policy.</p> <p>In the National Park DNPA believe this policy conflicts with strategic policy DMD9 which only allows conversion of historic buildings and that consideration is given to commercial less harmful uses before residential uses. Domestic conversion of traditional buildings is often the most harmful way to re-use them because of the requirement for subdivision, new openings, insulation and changes to setting. In many cases extension and significant new openings allowed in a) and b) could significantly harm historic character. How does this policy mesh with the need to respect historic character and Policy H3's requirement for housing development to take account of the Historical Environment? What evidence do you have which suggests this approach will not lead to harm?</p>
<p>Policy E1. A Small-scale proposals providing office, retail or light industrial units, will be supported, subject to all the following criteria being met:</p> <p>c) The proposed use will not have an adverse impact on the amenity of nearby properties or on the landscape.</p> <p>h) For businesses that meet these criteria applications will be considered for sites where it can be shown that the business would benefit from being easily accessible to passing traffic or intended clientele, but all related parking must be off the highway and include a loading and turning space.</p> <p>For such developments, landscaping and green screening should be incorporated into the design to reduce the visual impact; for example, to ensure the visibility of the development is limited as far as possible to the road. All such development must meet the same standards of good design as those required for housing (see H3, H4 and H5).</p>	<p>In the National Park the policy conflicts with COR18 by allowing employment development in the open countryside.</p> <p>c) Consistent with the comments above, and the difficulty to sometimes demonstrate compete protection of amenity, WDBC recommend insertion of 'unacceptable' before adverse.</p> <p>d) this policy seems to want to restrict the occupation of retail space to a small group of retailers, how is this to be controlled and what evidence suggests it is justified? The planning system cannot control who leases retail space and therefore I don't believe this policy would be workable. The wording also seems unclear and could be taken to mean a very broad range of business types which could be undesirable, particularly on historic farmsteads.</p> <p>h) We would recommend 'For such developments, landscaping and green screening should, <i>where necessary</i>, be incorporated into the design to reduce the visual impact. Screening will not always be appropriate and should also be consistent with surrounding landscape features. Introducing alien landscape features (e.g. bunds and coniferous tree lines) can cause significant harm to landscape character.</p>

<p>Policy E1. b Excluding those changes of use allowed under Permitted Development, Employment sites within the plan area shall remain as far as possible in or available for employment uses and not be redeveloped for other purposes. Only on production of evidence that advertising and publicity has failed to attract a new business can the site be considered for housing or other purposes.</p>	<p>Consider adding a minimum time over which continuous marketing must have taken place: 18 months to two years may be considered reasonable.</p>
<p>Policy E1.c Proposals to provide broadband and mobile telephone reception in suitably located positions and in line with other policies in the plan will be encouraged, subject to an assessment of impact on the landscape.</p>	<p>Suggest referring to 'Telecommunications' rather than broadband/mobile phone. The plan doesn't set out how suitable locations will be assessed. It also refers to the need for development to be in line with other policies in the plan although no other policies in the plan relate to telecommunications development. Is this the intention? In the National Park does it add anything more to policy DMD20?</p>
<p>Policy E2. Tourist and recreational developments that add to the sustainability of the local economy will be supported where the applicant can demonstrate that all the following criteria have been met:</p> <p>a) The developer must provide evidence that the proposed use does not have an adverse impact on the residential amenity of local residents, on local housing availability (Appendix IV) or on neighbouring land-use;</p> <p>d) In addition to those changes of use allowed under Permitted Development, conversion of agricultural buildings for tourist use will be supported subject to the following conditions: <i>etc</i></p>	<p>There tends to be three types of tourist development in rural areas: temporary structures such as caravans, shepherds huts etc; conversion of redundant buildings, and new permanent build holiday lets. The latter can be much higher risk as it is essentially a new build dwelling in the countryside with a holiday tie. If built, it isn't that difficult to demonstrate non-viability over a short period. It may be wise to address this issue within the policy: for example, it could say that 'new build holiday lets will only be permitted when they relate to an existing tourism facility and when a long term need has been evidenced.'</p> <p>a) would recommend 'unacceptable' before 'adverse'.</p> <p>For d), please see above comments about extensions to historic barns. The policy also allows conversion of modern agricultural buildings which, in the National Park, conflicts with Policy DMD9. In the National Park, policy DMD35 allows creation of new tourism uses to support farm diversification – this policy may be sufficient for your purposes.</p>
<p>Policy HCA 1.a Proposals that will enhance the viability and/or the community value of recognised community assets will be supported. Opportunities to create new community assets will be encouraged. Future provision of similar</p>	

<p>facilities where compatible with conditions set out in the Bridestowe and Sourton Neighbourhood Development Plan may be considered as additional community assets. No proposal that will result in either the loss of a community asset as listed in Appendix VI or significant harm to its community value or viability will be permitted, unless the proposal will provide a replacement asset of equal or greater value to the community. Proposals that enhance or facilitate improvements to community assets will be supported provided that these are conveniently located to the villages of Bridestowe or Sourton.</p>	<p>We have not seen information provided in appendices, so cannot comment on the list of community assets. Have these been formally registered by WDBC as Assets of Community Value? It would be reasonable to allow change of use where an asset is no longer needed or viable, particularly if any of the assets are private businesses. A similar requirement for marketing could be added as suggested for Policy E1.b. above.</p>
<p>Policy HCA 1.b Non designated Heritage Assets including the Local List of Buildings of Architectural or Historic Interest. Development proposals affecting a non-designated heritage asset including any building on the Local List of buildings of architectural or historic or interest must be accompanied by information which describes the significance of the heritage asset including any contribution made by its setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.</p>	<p>As above, information required with planning applications is set at national and district level and is set out in Local Validation Lists. It is not possible for a neighbourhood plan to require information in addition to these requirements.</p> <p>WDBC does not have a Local List. However, the neighbourhood plan is an appropriate place to identify non designated local heritage assets, and it may be more appropriate to have a policy along the lines of: 'Development should conserve or enhance the historic environment, including designated heritage assets of national importance and undesignated heritage assets of local significance and their settings. Assets of local significance include, but are not limited to, those identified in... (appendix etc)'. This wording is consistent with JLP DEV22, and would add useful local detail to it.</p>
<p>Policy LC1 Proposals will be supported for small-scale renewable energy infrastructure that is compatible with the landscape sensitivity of the Parishes and does not, either individually or cumulatively have an adverse impact on the special qualities of the landscape within the plan area or the setting of Dartmoor National Park. Such development will be supported provided the following conditions are met: <i>etc</i></p>	<p>It would be helpful to refer to JLP DEV35 and to consider how this NP policy responds to JLP policy and adds local detail. Some of your criteria may not be necessary in conjunction with DEV35, or may be better differently worded in order to correspond more closely with it and provide more clarity for decision makers.</p> <p>The Plan area includes areas within Dartmoor National Park, the reference to setting implies that this policy may not be intended to extend into the DNP? This point should be clarified.</p>
<p>Policy LC1b 1. Support will be given to individual & community scale energy generation from Hydroelectric, Solar thermal, Photovoltaic, Biomass and Wood Fuel. 2. Developers will be strongly encouraged to build homes that exceed the minimum national</p>	<p>1. This repeats policy LC1 although changes the scale which adds confusion. It could be incorporated in LC1 2. This wording may be better as supporting text rather than policy: local policy can no longer require standards beyond Building Regs.</p>

standards for sustainable homes requirements will be strongly encouraged.	
Policy CW1	There seems to be no requirement for these facilities to be well related to the communities they are intended to serve and so reduce the need to travel, make best use of existing infrastructure and prevent the sprawl of development into the countryside. This could have undesirable consequences. In the National Park does it add anything to existing policy?
Policy CW 2 Communications Infrastructure b. Developers proposing housing developments will be required to provide a 'Connectivity Statement' confirming and detailing how the development will be provided with internet connectivity that meets the agreed national standard of minimum download speed of 25 Mbps.	b. As above, information required with planning applications is set at national and district level and is set out in Local Validation Lists. It is not possible for a neighbourhood plan to require information in addition to these requirements. Is there another way to word this in order to achieve a similar result, bearing in mind that any requirement on development must be reasonable and deliverable?
Policy CW 3 Developer Contribution 1. Proposals for new development of 5 or more dwellings must provide appropriate contributions to new community facilities on-site if appropriate, or directly deliver off-site facilities or a financial contribution to the provision of such facilities elsewhere, as determined by the Local Planning Authority.	As set out in CIL regs, contributions required from developers must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. They cannot be used to rectify any existing lack in facilities or infrastructure, only to provide for need generated by the development. The wording of the policy needs to reflect this. Is there a reason for saying 5 dwellings rather than, say 10? Is there evidence to suggest what community facilities are needed, based on an assessment of need and of existing facilities?

Locality has produced guidance to help neighbourhood planning groups develop effective plan policies called '[Writing Planning Policies](#)' which can be found on its website. You may also wish to consider making use of a 'health check'. A 'health check' provides an opportunity for an independent third party to assess whether they consider your draft plan meets each of the basic conditions before you submit it to your local planning authority. Further information on 'health checks' and the requirements of formal submission such as the basic conditions and the consultation statement can be found in the Planning Aid guidance '[How to Submit Your Neighbourhood Plan Proposal](#)'.

I hope you find these comments useful. Please do not hesitate to contact the neighbourhood planning team at NeighbourhoodPlan@swdevon.gov.uk if you would like further clarification on any of them.

Best wishes,

Mandy Goddard
Neighbourhood Planning Specialist



South Hams and West Devon

Strategic Development Plan Policies December 2017

This document sets out the strategic development plan policies which neighbourhood plans in South Hams and West Devon should demonstrate conformity with, as at December 2017.

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Introduction

1. The Emerging Plymouth and South West Devon Joint Local Plan (JLP)
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Introduction

Neighbourhood plans must be in conformity with the strategic elements of the Local Development Plan that is extant at the time of the examination of the neighbourhood plan. As at December 2017, the extant Local Development Plans for the two Districts are the South Hams Core Strategy 2006 and associated documents, and the West Devon Core Strategy 2011 and associated documents. Further detail on these documents and the relevant policies is given below in Sections 2 and 3. A new Joint Local Plan for the two Districts and Plymouth is currently being examined and is expected to be adopted in 2018.

1. The Emerging Plymouth and South West Devon Joint Local Plan (JLP)

<https://www.plymouth.gov.uk/sites/default/files/PlymouthSouthWestDevonJointLocalPlanSubmission.pdf>

Emerging policy should not be referenced in Neighbourhood Plans if the NP is expected to be examined before it is adopted. However, it is important to ensure that NPs are in general conformity with the strategic elements of the emerging JLP and with evidence gathered for the JLP, so that the NP does not become out of date once the JLP is in place.

Relevant sections and policies of the JLP are as follows:

The Vision

The Strategic Objectives

Policy SPT1 Delivering sustainable development

Policy SPT2 Sustainable linked neighbourhoods and sustainable rural communities

Policy SPT3 Provision for new homes
Policy SPT4 Provision for employment floorspace
Policy SPT5 Provision for retail development
Policy SPT6 Spatial provision of retail and main town centre uses
Policy SPT7 Working with neighbouring areas
Policy SPT8 Strategic connectivity
Policy SPT9 Strategic principles for transport planning and strategy
Policy SPT10 Balanced transport strategy for growth and healthy and sustainable communities
Policy SPT11 Strategic approach to the natural environment
Policy SPT12 Strategic infrastructure measures to deliver the spatial strategy
Policy SPT13 European Sites – mitigation of recreational impacts from development
Policy TTV1 Prioritising growth through a hierarchy of sustainable settlements
Policy TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area
Policies TTV3 – TTV28 (Main Towns) where relevant
Policy TTV29 Site allocations in the Smaller Towns and Key Villages where relevant
Policy TTV30 Empowering local residents to create strong and sustainable communities where relevant
Policy TTV31 Development in the countryside

Policy DEV1 Protecting health and amenity
Policy DEV2 Air, water, soil, noise, land and light pollution
Policy DEV3 Sport & Recreation
Policy DEV8 Meeting local housing need in the Thriving Towns and Villages Policy Area
Policy DEV9 Meeting local housing need in the Plan Area
Policy DEV10 Delivering High Quality Housing
Policy DEV13 Consideration of sites for Travellers and Travelling Showpeople
Policy DEV14 Maintaining a flexible mix of employment sites
Policy DEV15 Supporting the rural economy
Policy DEV17 Promoting competitive town centres (where relevant)
Policy DEV18 Protecting local shops and services
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Policy DEV31 Specific provisions relating to transport
Policy DEV32 Meeting the community infrastructure needs of new homes
Policy DEV34 Delivering low carbon development
Policy DEV35 Renewable and low carbon energy (including heat)
Policy DEV36 Community energy
Policy DEV37 Managing flood risk and water quality impacts
Policy DEV38 Coastal Change Management Areas

2. South Hams District Council

Development Plan Strategic Policies December 2017

<https://www.southhams.gov.uk/article/3868/Local-Development-Framework>

The extant Development Plan for South Hams District as at December 2017 comprises the following documents:

- 2006 Core Strategy including saved policies from the 1996 Local Plan
- 2007 Sherford New Community Area Action Plan (AAP)
- 2008 Affordable Housing Development Plan Document (DPD)
- 2010 Development Policies Development Plan Document (DPD)
- 2011 Site Allocations Development Plan Document (DPD) for:
 - Dartmouth
 - Ivybridge
 - Kingsbridge
 - Totnes
 - Rural Areas

The Council considers the following policies relevant as strategic policies with which Neighbourhood Plans should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given.

Policies that the Council considers Neighbourhood Plans should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity required?	Notes
Core Strategy 2006		
CS1, Location of Development	Y	Not in full conformity with NPPF; however, NPs should have regard to CS1 as it gives an indication of which settlements are considered sustainable by the Council. NPPF Paras 14-15 are also relevant ('Presumption in favour of sustainable development').
CS2, Housing numbers	N	Out of date. Not in conformity with NPPF – relevant section: 6. Delivering a wide choice of high quality homes. JLP evidence is relevant.
CS3, Employment land provision	Y	Compliance required though NPs may add detail
CS4, Sherford New Community	N	Where relevant.
CS5, Previously developed land	Y	NPPF 111 permits local targets. No new evidence to suggest a different target, however, the Council suggests flexibility on the 50% figure.

CS6, Affordable Housing	N	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant. New JLP evidence suggests 30%
CS7, Design	Y	Sets out broad design parameters. NPs may add local detail. DPD1 is relevant.
CS8, Infrastructure provision	Y	NPs may add local detail.
CS9, Landscape and historic environment	Y	In broad conformity with NPPF. NPs may add local detail. DPD2 and DPD5 are relevant.
CS10, Nature conservation	Y	DPD5 is relevant.
CS11, Climate change	Y	In broad conformity with NPPF. NPs may add local detail.
CS12 Tourism	N	NPPF does not advocate a sequential approach for tourism related development. Relevant NPPF sections: 1. Building a strong, competitive economy 2. Ensuring the vitality of town centres 3. Supporting a prosperous rural economy
CS13, Rural diversification	N	Not in full conformity with NPPF. NPPF Para 28 takes precedence.
Development Policies DPD		
DPD7, Transport, access and parking	Y	
DPD8, Open space, sport and recreation	Y	
DP11, Housing mix and tenure	Y	
Site Allocations DPD policies where appropriate		

3. West Devon Borough Council

Development Plan Strategic Policies December 2017

<https://www.westdevon.gov.uk/article/3867/Local-Development-Framework>

The extant Development Plan for West Devon Borough Council as at December 2017 comprises the following documents:

- 2011 Core Strategy
- Proposals Map
- Settlement Maps
- Saved policies from the 2005 Local Plan Review (as amended 2011)

The Council considers the following policies relevant as strategic policies with which Neighbourhood Plans should be in conformity where they are still up to date and in conformity with the National Planning Policy Framework (NPPF). Where policies are not in conformity with the NPPF, the NPPF will take precedence and the relevant NPPF paragraph or section is given. Evidence produced to support the emerging Joint Local Plan should be taken into account: this is highlighted where relevant.

Policies that the Council considers Neighbourhood Plans should be in conformity with are shaded green in the following table.

Strategic Policy	Conformity Required?	Notes
2011 Core Strategy		
Strategic Policy 1 Sustainable Development	Yes	Sets out sustainable development principles and is in conformity with the NPPF
Strategic Policy 2 Decentralised Renewable and Low Carbon Energy to Supply New Developments	No	Whilst the aspirations of the policy are NPPF compliant, the delivery component of it is not – in that such requirements are likely to be considered so onerous now as to threaten viability and deliverability. NPPF Section 10 takes precedence, particularly paragraphs 97 and 98.
Strategic Policy 3 Renewable Energy	No	Not fully NPPF compliant: pre-dates the Written Ministerial Statement that requires onshore wind to come forward only on allocated sites in Local or Neighbourhood Plans. NPPF Section 10 and Written Statement (HCWS42) take precedence. https://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf More up-to-date evidence and guidance is available at

		https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 4 Infrastructure Provision	Yes	In general conformity with NPPF. See also West Devon Infrastructure Delivery Plan 2015 https://www.plymouth.gov.uk/sites/default/files/WestDevonBoroughCouncilInfrastructureDeliveryPlan.pdf
Strategic Policy 5 Spatial Strategy	No	Partially in conformity with NPPF, but too inflexible on development in the countryside/outside village development boundaries. NPPF Presumption in Favour of Sustainable Development takes precedence, Paras 14-16.
Strategic Policy 6 Density of Housing Development	No	While the NPPF allows for density rates to be set locally, it emphasises local circumstances and appropriate design. NPPF Paras 47 and 59 take precedence.
Strategic Policy 7 Strategic Distribution of Housing	Yes	Broadly in conformity with NPPF, provided up-to-date evidence still supports these numbers. Evidence is available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 8 Inclusive Communities	Yes except final paragraph (Lifetime Homes Standard)	Largely in conformity with NPPF. Lifetime Homes Standard no longer in use. Housing mix should be based on up-to-date evidence of local needs. For district need see Strategic Housing Market Assessment 2017 https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf
Strategic Policy 9 Meeting Housing Needs	No	Does not conform with NPPF in terms of evidence. NPPF Paras 50 and 54 are relevant. New JLP evidence suggests 30% - see JLP Dev8 for detail. See https://www.plymouth.gov.uk/sites/default/files/StrategicHousingMarketNeedsAssessmentPart2.pdf
Strategic Policy 10 Supporting the Growth of the Economy	Yes	The objective of this policy is in conformity with the NPPF, though the NPPF gives more detail on an expected strategy for plans. NPPF Paras 18-22 are relevant. Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 11 Rural Regeneration	Yes	In broad conformity with NPPF.
Strategic Policy 12 Retailing	Yes	In broad conformity with NPPF. See SPD 'Assessing the Impact of New Retail Development in West Devon' 2013 and evidence at https://www.plymouth.gov.uk/jointlocalplanevidencebase
Strategic Policy 13	Yes	In broad conformity with NPPF. Up-to-date evidence

Community Services and Facilities		available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 14 Accessibility Planning	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 15 Traffic Management	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 16 Safer Communities	Yes	In conformity with NPPF.
Strategic Policy 17 Landscape Character	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 18 The Heritage and Historical Character of West Devon	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 19 Biodiversity	Yes	In broad conformity with NPPF. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 20 Promoting High Quality Design	Yes	In broad conformity with NPPF, although NPPF also references distinctive and innovative design (para 63, 65) and community involvement. NPPF Paras 56-68 are relevant. Up-to-date evidence available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 21 Flooding	Yes	NPPF paras 102-104 are relevant
Strategic Policy 22 Okehampton	No	Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 23 Tavistock	No	Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase
Strategic Policy 24 Sustainable Rural Communities	No	Up-to-date evidence is available at https://www.plymouth.gov.uk/jointlocalplaneevidencebase

Appendix 2.

Dartmoor National Park Strategic Policies	
All Allocations related settlement policies (allocations)	
Sustainable Communities	
COR01	Sustainable Development Principles
COR02	Settlement Strategies
COR04	Design and sustainable development principles
COR12	Meeting the need for local infrastructure, community facilities and public services
COR13	Providing for high standards of accessibility and design
COR14	Meeting the infrastructure requirements of new development
COR16	Meeting the needs of vulnerable groups and those with special needs
COR17	Promoting increased health and well-being
COR21	Dealing with development and transport issues in a sustainable way
DMD01a	Presumption in favour of sustainable development
DMD03	Sustaining the quality of places in Dartmoor National Park
DMD07	Dartmoor's built environment
DMD45	Settlement boundaries
Environment	
COR03	Protection of Dartmoor's special environmental qualities
COR05	Protecting the historic built environment
COR06	Protecting Dartmoor's Archaeology
COR07	Providing for the conservation of Dartmoor's varied plant and animal life and geology
COR11	Retaining tranquillity
DMD01b	Delivering National Park purposes and protecting Dartmoor National Park's special qualities
DMD02	Major Development
DMD05	National Park Landscape
DMD06	Dartmoor's moorland and woodland
DMD08	Changes to Historic Buildings
DMD09	The re-use and adaptation of historic buildings in the countryside

DMD11	Demolition of a listed building or local heritage asset
DMD12	Conservation Areas
DMD14	Biodiversity and geological conservation
Housing	
COR15	Providing for limited new housing to meet local needs
DMD21	Residential development in Local Centres
DMD22	Residential development in Rural Settlements
DMD23	Residential development outside Local Centres and Rural Settlements
DMD29	The accommodation needs of gypsies and travellers