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**West Devon
Borough
Council**

7 April 2017

Dear Granville

West Devon Borough Council (WDBC) response to the draft Bere Peninsula Neighbourhood Plan

Thank you for sending the pre-submission Bere Peninsula Neighbourhood Plan (Regulation 14)* to the Local Planning Authority (LPA) for comments. This will be referred to as the Draft Bere Peninsula Neighbourhood Plan (Draft NP) in this document.

The LPA fully supports the initiative for the Neighbourhood Planning Group (NPG) to produce a Neighbourhood Plan (NP) and recognises that much work has gone into the development of the NP with extensive community involvement. The LPA commends the Bere Peninsula Neighbourhood Plan Group (NPG) for all the hard work already put into the Plan.

These comments have been provided to assist the Neighbourhood Planning Group (NPG) in producing a Draft Neighbourhood Plan (Regulation 15)*. The response is based on the information provided and available at the time of reviewing the Plan, which includes the pre-submission draft Bere Peninsula Neighbourhood Plan (Dec 2016) and other consultation documents.

The LPA has made a number of suggestions for further consideration prior to submission of a Draft Neighbourhood Plan to help ensure the Plan is successful at examination and contributes to a strong planning policy framework for the Bere Peninsula.

Key comments on the overall NP are:

- 1) This is a very good document, well written, clear, and for the most part factually correct.
- 2) There is some concern over:

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- a. How the plan can show compliance with Paragraph 116 of the National Planning Policy Framework (concerning development in AONBs).
- b. The lack of any Local Green Space designation.
- c. Compliance of the affordable housing element of the plan with the JLP.

3) Policy references need to be updated to refer to the Joint Local Plan rather than the Core Strategy.

Comments on specific parts of the Neighbourhood Plan

Section, policy or text	Comment
Section 2: Neighbourhood Planning Context	This section overall provides very useful context
p5. Once this Neighbourhood Plan is adopted it will be a primary consideration when determining planning applications within the Plan Area	The Neighbourhood Plan will not necessarily be the primary consideration - it will be applied alongside the JLP, with neither having primacy.
Section 5.p10 Bere Alston is the only centre that provides a range of shops and services, and therefore provides a sustainable location for new development	Sustainability in rural areas can be difficult to define and appreciate. The Village Sustainability Assessment that is part of the JLP evidence base identifies that Bere Ferrers is also a sustainable location for new homes, albeit at a much lower, locally appropriate scale.
Section 6. p14. Promoting Sustainable Development	This section overall is very helpful, and explains the basis for making housing allocations very well. It may be worth introducing the exception tests of para 116 here.
p.15. Because of the peninsula's relative isolation and unique environmental and historic heritage, development will be limited to meeting local needs only.	The meaning isn't clear here - will all new homes be 'affordable homes' that require a local connection criteria? Why would someone who is not 'local' be prevented from buying an open market home?
p.16. However, any such proposal at Bere Ferrers village or in the countryside will need to demonstrate that it is intended to meet a specifically identified local need and that this need cannot more appropriately be met at Bere Alston	The JLP has very different policy requirements for Bere Ferrers (classified as a sustainable village) and Development in the Countryside.
Diagram 1, p.17	This is potentially a very helpful map, although the quality could be improved if possible to aid readability. All maps should have copyright permission clearly displayed.
p.19. The re-instatement of the railway line from Bere Alston to Tavistock is now	DCC had originally included a dedicated cycle path along the reinstated rail connection to Tavistock. This had to be removed from the

confirmed together with new residential development in Tavistock.	trackbed before Shillamill, but DCC had proposed an alternative route, and done some preparatory groundwork. For completeness the transport section should not be restricted to motorised transport, and this piece of infrastructure has support from DCC - speak to Lewis Ward (DCC) and Cllr Philip Sanders for more info.
Section 7, p.22. Vision Statement	These 3 bullet points seem more like thematic objectives than part of a Vision?
Section 8	This is a well written explanation of how the different components of the NP are to be read/understood
Policy E1	The main concern about this policy is that NPs are encouraged to avoid repeating existing policies from higher level documents. Because much of the Bere Peninsula is so heavily designated, it is also very well served with existing plans and policies. Does this NP policy add anything to these?
Policy E2	As above, all of these designations have a statutory policy framework in place, so would question the need to repeat?
Policy E3	The government considers that the current Building Regulations requirements will lead to lowering carbon emissions - and certainly when compared to an inefficient rural housing stock, this is true.
E3 Justification	Most housebuilders will achieve more by going 10% above insulation requirements (fabric first) than by building an inefficient building and generating 10% by renewables - this is consistent with the energy hierarchy outlined in your policy - which would you rather achieve, better dwelling efficiency or onsite renewables? It is unlikely to be both.
Environment: Community Actions	Suggest that a lot more is said here about the existing Tamar Energy Community, and how the NP could work with this group, rather than suggest setting up a separate group that may replicate or dilute the efforts of TEC.
Policy H1	Suggest 'proposals will be supported' rather than 'planning permission will be granted', given that proposals will be judged on a range of planning criteria, not just NP policy.
H1 Justification p.31. There is no justification for allocating land for more than this minimum planned requirement	Justification needs to be provided on the basis of how the tests of paragraph 116 of the NPPF are met by these allocations.
Policy H2	There is a policy requirement within the JLP that applies the minimum Nationally Prescribed Space Standards - may be worth referring to here.

Policy H2	Does the size and scale of this development trigger the need for a play area? How does this fit with the other obligations required of the allocation? What is the proposed management arrangement?
Policy H3	A play space here as well may be considered excessive. It is within a short walk of both the existing play area off The Down, and the play space stipulated in Policy H02.
Policy H5 Justification	Individual plots will still need to be in demonstrably sustainable locations
p.39 Any new housing developments on the Bere Peninsula must contribute to conserving and enhancing the special qualities of the AONB and World Heritage site.	This is not necessarily true of ALL housing developments on the peninsula. A single infill plot is unlikely to need to show its contribution to AONB or WHS.
p.42 The housing stock has a high proportion of semi-detached and terraced smaller family housing which needs to be balanced out.	This seems to suggest the plan area needs more large, detached dwellings - which doesn't seem compatible with an increasing older population?
p.42 The proportion of homes for affordable rent and shared ownership is small and there is a continuing need for affordable homes of both tenures.	Again, not particularly compatible with the previous statement.
Policy EC2	As previously, 'will be supported' rather than 'will be granted'
Policy EC3	Presumably most of these will be permitted development?
Policy T1	Very good to see electric charging points included - provides compatibility with emerging JLP position
p.46. Community Actions: Transport	Suggest that an additional caveat needs to be added 'subject to approval from DCC Highways'
p.47 the hazard presented by the narrowing of the road on the brow between the Bowls Club and Quarry Cross	DCC didn't want to alter the narrow part of the road as it provides a natural deterrent to traffic entering the village. Widening the road will increase speeds.
p.47 Make marginal improvements to passing places on the Denham Bridge and Bere Alston to Bere Ferrers village routes in the interest of safety.	Better driver awareness (no more than one car per passing bay) would make more difference than widening the bays... a bigger bay would encourage 3 cars to try and squeeze in, and not remedy the problem.
Policy C1	Does this mean anywhere? The policy needs to be spatially specific, and refer to the recognised

	shopping core of BA, and/or a defined area of Bere Ferrers.
Policy C2 All open space, sport and recreation areas will be protected.	The only mechanism for protecting these spaces is as Local Green Spaces - and they must meet the criteria required in para 77 of the NPPF. A policy that seeks a blanket protection is not appropriate

I hope you find these comments useful. Please do not hesitate to contact me if you would like further clarification on any of them.

Best wishes,

Mandy Goddard
Neighbourhood Planning Specialist