



South Hams District Council

Response to the

North Tawton Neighbourhood Plan Regulation 16 consultation

24th May 2019

The North Tawton Neighbourhood Plan was submitted to West Devon Borough Council on 3rd April 2019. The Council was satisfied that the submission draft and accompanying documents complied with all the relevant statutory requirements

The plan was publicised in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations and representations invited between 8th April 2019 – 20th May 2019.

West Devon Borough Council made a full response to the Regulation 14 consultation carried out by the Qualifying Body in respect of the North Tawton Neighbourhood Plan. This document sets out South Hams District Council's response to the Regulation 16 version of the plan, focussing on the extent to which it is considered that the current version of the draft plan has responded to comments made at Regulation 14 and whether any significant concerns remain.

On 26th March 2019 the Plymouth and South West Devon Joint Local Plan (JLP) was adopted. As such all reference to the West Devon Core Strategy should be removed for the Neighbourhood Plan at the following locations in the text:-

Para 6.2 First sentence.

Para 11.1 Second sentence

Diagram below para 11.2

Par 50.4 Second sentence

"Relevant Local and National Policies" set out on pages 37, 50,

Also in Para 19.5 third bullet point reference is made to "green belt" this should be removed since there is no green belt in the North Tawton area.

The following comments are made in respect of the Policies set out in the Plan:-

Policy/Text	Comments
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Conserving Our Historic and Natural Environment	
Policy CH1 - Local Green Space Designation	Reference to engagement with the local community and Town Council should be removed from the final sentence since this is not a land use consideration. It can be placed in the supporting text
Policy CH2 - Design, Heritage and the Built Environment	Second paragraph: suggest rewording first sentence to read “ take full account of the North Tawton Design Statement”. Also remove “ensuring that” from the outset of criteria i), ii) and iii) and iv). In terms of criterion iv) adding “which”...where practicable....”maximises...”. In terms of criterion v) reword...”the use of traditional design”....where appropriate.”...in the NorthTawton Conservation Area....”.
Policy CH3 - Important Amenity Views and Landscape Character	No comment
Community Life	
Policy CO1 - Protecting Community Facilities from Loss	The reference at the end of the Policy to the GPDO should be removed since it is unclear.
Policy CO2 - Replacing, Improving and Increasing Play, Sports and Recreation Facilities	Remove criteria v) since this is not a land use consideration and will be considered in any event if a planning application is necessary.
Policy CO3 - Priority Local Infrastructure and Projects	Reference to engagement with the local community and Town Council should be removed from the first sentence since this is not a land use consideration. It can be placed in the supporting text
Economy	
Policy E1 - Local Employment Land	Last sentence with additional points 1) and 2). 1) It is unrealistic to expect extending a premises should be accompanied by an increase in employment. There maybe other good business reasons. This should be removed as a consideration. 2) The sentence is unfinished.
Policy E2: Homeworking	No comment
Policy E3 - Live-Work Unit	No comment
Policy E4: Maintaining the Retail & Business Offer	No comment

Safeguarding Public Transport	Para 43.2 Second sentence makes reference to Policy E6 which is not in the Plan.
Housing	
Housing: 'Call for Sites' Process	No comment
Housing: Development Sites with Planning Permission	No comment
Policy HO1: Site Allocation for Housing Development	<p>The paragraph and section identifying criteria that should apply all development proposals should be placed in order. It appears to follow the descriptive relating to "Land South of Exeter Street".</p> <p>In terms of each allocation the reference to a precise number of dwellings to be provided is amended to include "around" to enable flexibility at detailed design stage.</p> <p>The third bullet point cross references to Policy HO7. This cross reference should be to HO6.</p> <p>The fourth bullet point refers to Policy HO5, please see comments below regarding this Policy.</p> <p>In terms of the sections of this Policy that relate to specific sites:-</p> <p>Land South of Strawberry Fields: Second bullet point should refer to Policy IN5 not E7.</p> <p>Land East of Devonshire Gardens: Second bullet point should refer to HO6 not HO7.</p>
Policy HO2: New Dwellings	Bullet point i): there is no justification in the text for what seems an arbitrary choice of 0.5 hectares.
Policy HO3: Affordable Housing	No comment
Policy HO4: Private Rear Amenity Space (Gardens)	Concerns were raised at Regulation 14 stage regarding the requirement of this Policy. The Neighbourhood Planning Group have undertaken research to set the 60 sq m standard. Concerns remain that this standard may not, in all cases, be desirable, necessary or achievable.

Policy HO5: Residential, Supported Care and Sheltered Homes	No comment.
Policy HO6: Parking in Residential Development	It would be useful if this Policy set out actual standards. The reference to including "Plug in" facilities (second para, first sentence) should be one of support rather than insistence..
Policy HO7: Small Scale Self-Build Housing	Reference to the Self-Build and Custom Housebuilding Act should be removed since enforcement of this Act is separate from Planning controls.
Infrastructure	
Policy IN1 - Development and Health Provision	No comment.
Policy IN2 - Development and the Implications for Education	The requirements of this Policy are already a standard part of Development Management procedures in relation to appropriate planning applications. As such there is no need for the Policy.
Policy IN3 - Development and the Implications for Car Parking Provision	The requirements of this Policy are already a standard part of Development Management procedures in relation to appropriate planning applications. As such there is no need for the Policy.
Policy IN4 - Development and the Implications for Traffic Congestion	The requirements of this Policy are already a standard part of Development Management procedures in relation to appropriate planning applications. As such there is no need for the Policy.
Policy IN5 - Safe Walking and Cycling Routes	No comment
Energy and Environment	
New Housing Development and Energy	
Policy EE1 - Individual and Community Energy Schemes	Criterion v) is not a land use consideration
Policy EE2: Commercial Energy Installation	The material benefits that could arise from Commercial Energy proposals are not a material land use consideration. It is suggested the Policy is removed. It can be included as a Community Action either within the general text or as an Appendix.
Policy EE3 - Sustainability and Housing	Suggest this Policy is reworded to state the NPG will support Passivhaus proposals not that they will only support such proposals.