



**PLYMOUTH &
SOUTH WEST
DEVON JOINT
LOCAL PLAN
2014-2034**

**REGULATION 22
(RESPONSE REPORT)
JULY 2017**

PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN

Regulation 22 Statement (Response Report)

CONTENTS

Introduction.....	I
Responses to consultation.....	I

APPENDIX I: A summary of the key issues raised by representations

APPENDIX II: A summary of the key issues raised by policy

APPENDIX III: Schedule of representations by consultee ID

APPENDIX IV: Schedule of representations by policy, objective, theme or area

APPENDIX V: Schedule of representations submitted via the 'JLP other supporting documents' event on objective

APPENDIX VI: Schedule of Late Representations

INTRODUCTION

This document sets out all the representations received during the Regulation 19 Consultation of the Plymouth and South West Devon Joint Local Plan which ran from 15 March to 26 April 2017. Altogether **2,443** comments were made by **945** contributing consultees and **39** comments were made by **38** contributing consultees on other documents.

Representations were received from residents, statutory consultees, special interest groups, developers, landowners and from businesses.

A detailed explanation of how, when and who Plymouth City Council, South Hams District Council and West Devon Borough Council engaged with during the last 5 years of consultation on the Plymouth and South West Devon Joint Plan can be found in the Statement of Consultation, July 2017 (submission reference SUB11).

RESPONSES TO CONSULTATION

A summary of the key issues raised by representations are set out in **APPENDIX I**.

A summary of the key issues raised by policy can be found in **APPENDIX II**.

APPENDIX III and **APPENDIX IV** is the Response Report of all comments made on the Plymouth and South West Devon Joint Local Plan through the Regulation 19 Consultation.

APPENDIX III is each representation ordered by consultee number which is a unique ID reference which was assigned to it on the Objective portal.

APPENDIX IV is each representation ordered by policy, objective, theme or area depending on our interpretation of what the main thrust of the representation was about. This does not always match the specific policy or part of the plan that a respondent might have linked their comment to on the Objective portal.

There were many cases where the system generated multiple ID references for what was in essence a representation about one policy or part of the plan (including where other policies of the plan were used to justify a particular position on the part of the plan the respondent was actually objecting to). Where this is the case, ID references appear in this Response Report only in relation to the parts of the plan actually being supported or objected to, in order to avoid duplication.

Additionally, there were cases where a single ID reference covered representations on multiple parts of the plan. Where this was the case, that ID reference will appear multiple times in the Response Report, linked to each particular part of the plan the comment was about.

Some responses were linked to particular policies, but in actual fact they were about some other aspect of the plan - including particular background papers. These situations are identified in the Response Report and other comments which were submitted on supporting documents are set out in **APPENDIX V**.

Of the comments received **61** representations by **16** contributing consultees were late with one organisation commenting multiple times. These are set out in **APPENDIX VI**.

Overall **269** different departments, organisations, companies and local community groups got involved and submitted comments during the Regulation 19 consultation, a list of these can be found in **APPENDIX VII**.

We have made every effort to make the Response Report as easy to use as possible and to remove any responses which we considered to be duplicates. However, given the substantial scale of the database it is possible that there will be some errors in the report. If any respondent considers that their representation is missing from the Report, please let the JLP team know as soon as possible by e-mailing plymouthplan@plymouth.gov.uk or calling 01752 305477.

APPENDIX I: SUMMARY OF KEY ISSUES RAISED BY REPRESENTATIONS

1. **Housing Need and Supply (Policy SPT3)**. The most significant representations received relate to the Objectively Assessed Need methodology, housing supply and the 5 Year Land Supply. Key elements of the reps are:

- Challenges to objectively assessed need methodology which over estimates need
- Challenges to objectively assessed need methodology which under estimates need
- Challenges to Housing distribution/housing requirement
- Challenges to Housing supply – 5 year supply
- Challenges to Housing supply - site selection process
- Challenges to Housing supply – Insufficient supply, additional sites required
- Challenges to Housing supply – Housing released to the market as a result of purpose built student accommodation
- Challenges to Housing supply – Lack of Housing trajectory and 5 year targets
- Challenges to Housing supply – Monitoring and Managing

2. **Distribution of housing development/site selection (Strategic Objective S01, Policy SPT3, Policy TTVI)**. Representations have been received challenging the distribution of housing between Plymouth Policy Area and Thriving Towns and Villages Policy Area, but also looking at the distribution across the three Local Planning Authorities and criticising the split between West Devon and South Hams. Challenges also made regarding the site selection methodology and allocations in South Hams in particular.

3. **Strategic approach to the natural environment (SPT11)**. Some comments were received relating to the strategic environmental policies in the plan, emphasising that the policy must protect AONBs and the Biosphere Reserve, highlighting possible ambiguity regarding decisions within Dartmoor National Park, and suggesting changes to wording relating to linking policy with landscape, wider functionality, clarifying the hierarchy to reflect the NPPF and protecting ancient woodland.

4. Representations received regarding the safeguarding of **Plymouth Airport (Policy PLY42)**, and particularly from PCA Ltd promoting their redevelopment proposals. Thrust of the objections is that the site cannot be reopened as a successful airport operation and that the safeguarding policy is not justified or achievable. Site should therefore be allocated for residential uses. The case presented also questions the greenfield/brownfield split in the Plymouth Policy Area, asserting that the Joint Local Plan has not prioritised brownfield land in the Plymouth Policy Area, and therefore has allocated the Woolwell urban extension for residential led development instead of the airport site.

5. The allocation of a new urban extension at **Woolwell (PLY44)** has received separate objections in terms of the principle of development, landscape issues and the form the development could take. The developers promoting the Woolwell site have objected to a number of the detailed parts of the policy allocating Woolwell, including that the requirement that no dwellings are occupied ahead of the completion of the Woolwell to the George road scheme is too restrictive.

6. **Site specific representations** were received relating to many of the allocations in the Local Plan. Significant numbers of objections were received with regard to:

TTV29.07 - Broom Park (145 representations)
 TTV29.05 - Dartington Foxhole (140 representations)
 TTV29.09 - Sawmills Field (142 representations)
 TTV29.10 – Woodlands Yard, Dartington (139 representations)
 TTV29.04 - Dartington Higher Barton (137 representations)
 TTV29.03 - Beacon Park, Dartington (135 representations)
 TTV29.06 – Brimhay (135 representations)
 TTV29.08 - Higher Tweed Mill, Dartington (134 representations)
 TTV29.16 – Pennpark (74 representations)
 TTV29.17 - West of Barracks Road (74 representations)
 TTV29.15 - West of Palm Cross, Modbury (73 representations)
 TTV29.22 - Green Park Way (18 objections)
 PLY27 – Register office (13 objections)
 TTV10 - Stibb Lane (13 objections)
 TTV29.23 - SE of Carehouse Cross (12 objections)
 PLY38 – Derriford Commercial Centre (11 objections)
 TTV09 – Filham (9 objections)
 TTV14 - Belle Hill (9 objections)
 PLY39 – Glacis Park (8 objections)
 TTV29.12 – Hatchmoor (7 objections)

6. **Affordable Housing and related matters. Policies DEV8 and DEV9** have attracted reps relating to affordable housing provision and points of detail around how the policies will work. Also raised some points about evidence supporting the requirement for wheelchair accessible housing.

7. **Employment Needs (Policy SPT4)**. Limited representations received (chiefly from Paignton NP group and Taylor Wimpey) challenging the methodology used to calculate employment needs, the link between employment and new housing, and asserting that employment needs should be greater and lead to an uplift in the Objectively Assessed Need for Housing.

8. We have also received a number of **omission sites** (below):

Omission Sites submitted to the Pre Submission consultation:

Site Location	Suggested Use	Name of Respondent and Representation Number
Weeke Hill, Dartmouth	Housing	Cllr Banstone (396)
Broadley	Should be shown as allocation site for empl - commitment expired	Nick Beddoe (484)
Belliver Industrial Estate	Employment (not SLA)	Nick Beddoe (484)
Tor Quarry	Employment	Buckland Touts Saints PC (36)
Millbay Port	Operational port	ABP (756)

Site Location	Suggested Use	Name of Respondent and Representation Number
NP plan sites for Modbury -east	Housing	Sunnybanks (672)
Alt sites for Stokenham / Chillington (Meadon Field and Bulls field?)	Housing	Crowther (1090)
Radford Quarry	Housing	
North Tawton sites	Housing	Wainhomes / Emery Planning (1285)
Brixton sites	Housing	Wainhomes / Emery Planning (1285)
Ivybridge (south site)	Housing	Nicole Stacey (1909)
K4 Allocation known as Garden Mill (Locks Hills), Derby Road, Kingsbridge.	Housing	H2Land (503)
BQW (Best Quality Windows) site, adj PLY58.9	Housing	Louis Dulling (479)
Dunraven Drive	Housing	Mark Evans (1849)
Little Cotton Farm, Dartmouth	Housing	Mark Evans (1849)
Plympton House	Housing	Mark Evans (1849)
Plymouth Airport	Housing Lead Mixed Use	PCA Ltd (1256)
Boringdon		Linden Homes (1484)
Brook Lane, Tavistock	Housing	Alex Graves / PCL Planning (1903)
Land at Brixton	Housing	Alex Graves / PCL Planning (1894)
Land at Rattery	Housing	Alex Graves / PCL Planning (1890)
St Annes Chapel	Housing	Alex Graves / PCL Planning (37)
Land at Brixton	Housing	Alex Graves / PCL Planning (1885)
Cattedown Wharf	Safeguard for minerals wharves	Devon Stone Federation (1518)
Corporation Wharf	Safeguard for minerals wharves	Devon Stone Federation (1518)
Victoria Wharf	Safeguard for minerals wharves	Devon Stone Federation (1518)
Pomphlett Wharf	Safeguard for minerals wharves	Devon Stone Federation (1518)
Anderton Lane Tavistock	Housing	Richard House, Gladman (607)
Pepys Place. Copnqueror Drive, Shackleton Court, Plymouth	Housing not neighbourhood green space	Mrs Howeson (Lousi Dulling) (70)
Callington Road South Tavistock	Housing	Bovis Homes, Ian Jewson (1057)
Devil's Point Reservoir	Green space designation	Julie Johns (428)
Avon Centre, Kingsbridge	Housing	Kingsbridge Town Council (880)
Hospital Field, Kingsbridge	Housing	Kingsbridge Town Council (880)
Dennings, Wellington Road, Kingsbridge	Housing	Kingsbridge Town Council (880)
Land off Culver Close, Kingsbridge	Housing	Kingsbridge Town Council (880)
Land off Warren Road, Kingsbridge	Housing	Kingsbridge Town Council (880)
Land NE Woodhouse Farm / S Kingsway Park, Kingsbridge	Housing	Kingsbridge Town Council (880)
Land to East of Washbrook Lane, Kingsbridge	Housing	Kingsbridge Town Council (880)
Thorn Park Lodge garden	LGS + should be in Mutley Park	Jan Knight
Land r/o 123-195 Fort Austin Avenue	Housing	Jackie Lewis (473)
Lake View Close	Housing	Ed Pearse (786)
NMA, Barbican		Josh McCarty (926)
Allern Lane	Housing	Taylor Wimpey (1972)
Pinewood Drive	Housing	Rebecca Mitchell (1043): A&M Trust (1676)
Haxter Lodge	Employment	Rebecca Mitchell (1042)
Broadley Park	Employment	Rebecca Mitchell (1042)
Allotments, True Street House, Berry Pomeroy	Housing	Andrea Peacock (228)
Old Postern Campus, Dartington	Mixed use including Residential, land-based and craft-based learning and	Dartington Hall Trust (1745)

Site Location	Suggested Use	Name of Respondent and Representation Number
	leisure activities	
Dartington Campus Area	Enabling appropriate development on the campus	Dartington Hall Trust (1726)
Weeke Hill, Dartmouth	Housing	Alan Pyne (5)
Winsland House, Follaton, Harberton	Housing	Harberton Parish Council (233)
Devonshire Gardens, N Tawton	Housing	Amy Roberts (394)
Darlake View	Housing	Bethan Roberts (341)
Alston Gate and other sites, Malborough	Housing	Scott Rossiter (11)
Sites to East of Chillington	Housing	Scott Rossiter (337)
site 0996 (Outland Road)	Not specified	Ian Russell (682)
North Road, Lifton	Housing	Aaron Smith (426)
Land at Brook Lane, Tavistock	Housing	Sarah Smith (429)
Sutton Harbour masterplan sites	Mixed Use	Sarah Smith (1763)
Penhill Lane, Hillhead	Housing	Peter Swallow (97)
Old Newnham Farm	Housing	Persimmon (690)
Land to north of Stibb Lane, Ivybridge	Housing	Persimmon (690)
Land on southern side of Barracks Hill, Totnes	Housing	Persimmon (690)
Land north of St Andrews Road and Newtake Road, Tavistock	Housing	Persimmon (690)
Extension of TTV9 Filham	Housing	Robin Upton (1093)
Blunts Lane	Housing	Duncan Westlake (1128)
Kings Tamerton	Biodiversity Corridor	George Wheeler (719)
Thornbury Road	Housing	David Young (115); Barrat Homes (1534)
Glanvilles Mill, Ivybridget	Housing	Des Dunlop (187)
land to the north of the A3072 in Hatherleigh	Housing	Land Value Alliances (1935)
Land to the north west of Ivybridge and Land to the west of Ivybridge.	Housing	Linden Homes (1495)
Money Centre		Henry Courtier (191)
Boringdon Park	Housing plus golf / hotel	SW Strategic Developments (976)
Vicarage Park, Kingston	Housing	Martin Lee (717)
Land North of Callington Road, Tavistock	Housing	Barrat Homes (1523)
Brookwood Road, Elburton	Housing	Barrat Homes (452)
St Werburgh Close, Wembury	Housing	Blue Cedar Homes (1641)
School Road, Stoke Fleming	Housing	Blue Cedar Homes (1641)

APPENDIX II: SUMMARY OF KEY ISSUES RAISED BY POLICY

Policy	Policy title	Support	Object to overall policy	Object to part of policy	Total reps known - with clear response on the policy	General comments	Total reps	% of total which are supports	% of total which are object to overall policy	Summary of Points Raised
SPT01	Delivering sustainable development	6	0	12	18	1	19	33%	0%	Site selection should have regard to cumulative impact and suggests a preference should be given to suitable sites within built up areas first Policy too restrictive to allow development to come forward SPT 1 requires more detailed historic environment natural asset protections Brownfield and Greenfield sites that contribute to sustainable patterns of development should be supported and encouraged Policy fails to achieve the intentions of embedding the principles of sustainable development from the outset, separates the 3 pillars of sustainable development generating conflict Fails to recognise the objective of meeting housing need where it arises
SPT02	Sustainable linked neighbourhoods and sustainable rural communities	10	0	7	17	1	18	59%	0%	Too restrictive to allow development to come forward Questions the translation of 1 allotment plot per 50 houses to 0.4ha per 1000 people General support for para 3.17 and points relating to promoting the aspects of sustainable neighbourhoods and the provision of local facilities Change sought to policy to further differentiate between urban and rural area
SPT03	Provision for new homes	4	77	9	90	2	92	4%	86%	Challenges to objectively assessed need methodology which over estimates need Challenges to objectively assessed need methodology which under estimates need Challenges to Housing distribution/housing requirement Challenges to Housing supply – 5 year supply Challenges to Housing supply - site selection process /SA? Challenges to Housing supply – Insufficient supply, additional sites required Challenges to Housing supply – Housing released to the market as a result of purpose built student accommodation Challenges to Housing supply – Lack of Housing trajectory and 5 year targets Challenges to Housing supply – Monitoring and Managing
SPT04	Provision for employment floorspace	2	1	3	6	0	6	33%	17%	No link between new jobs and increase in homes Jobs growth not linked to a baseline figures Not clear how new employment land will be provided in South Hams SAC Questions the employment forecasts used.
SPT05	Provision for retail development	1	1	3	5	0	5	20%	20%	Support for approach of policy Concerns over impact of Proposed Derriford District Centre and it impacts on other centre including city centre Evidence base for proposed allocation is challenged which support allocations
SPT06	Spatial provision of retail and main town centre uses	1	0	2	3	0	3	33%	0%	Support for sequential approach Concerns over impact of Proposed Derriford District Centre and it impacts on other centre including city centre Primacy of City Centre Should be retained
SPT07	Working with neighbouring areas	2	0	6	8	0	8	25%	0%	Should include South East Cornwall in the HMA Clarify relationship with Devon Acknowledge landscape constraints between Totnes and Torbay
SPT08	Strategic connectivity	10	0	6	16	1	17	63%	0%	The policy should place greater emphasis on sustainable modes and not more road building Digital connectivity elements could be strengthened Should be greater use of measures to discourage car use - eg road charging Safeguarding of the airport is wholly in appropriate and contrary to NPPF Safeguarding of the airport is supported by should be for the life of the plan not just the first 5 years.
SPT09	Strategic principles for transport planning and strategy	2	0	2	4	2	6	50%	0%	Better public transport needed to support rural areas The policy does not contain any mention of guiding the style and appropriateness of transport infrastructure to landscape, vernacular and sense of place
SPT10	Balanced transport strategy for growth and healthy and sustainable	2	0	2	4	1	5	50%	0%	Development in the JLP could be encouraged to be designed in line with the Active Design principles This policy acknowledges the importance of the hierarchy of transport modes that was introduced in Policy SPT9 but does not truly reflect that hierarchy in the statement of the policy itself

Policy	Policy title	Support	Object to overall policy	Object to part of policy	Total reps known - with clear response on the policy	General comments	Total reps	% of total which are supports	% of total which are object to overall policy	Summary of Points Raised
	communities									
SPT11	Strategic approach to the natural environment	6	4	4	14	3	17	43%	29%	Supports policy. Policy must protect AONBs and Biosphere Reserve and is important for towns and villages. Possible ambiguity regarding decisions within Dartmoor National Park. Suggests changes to wording relating to linking policy with landscape, wider functionality, clarifying hierarchy, reflecting the NPPF and protecting ancient woodland.
SPT12	Strategic infrastructure measures to deliver the spatial strategy	2	0	3	5	2	7	40%	0%	Need Relief road for Modbury; Should be reference to enhancement of natural and historic environment; Errors in names of European sites; Should state that protection of European sites is mandatory
PLY04	Protecting and strengthening Devonport Naval Base and Dockyard's strategic role	0	0	1	1	0	1	0%	0%	The policy and supporting text needs to be clear about when it is referring to the MOD-owned HMNB Devonport, the Babcock-owned Devonport Royal Dockyard Ltd, (DRDL), and the wider complex incorporating them both
PLY05	Safeguarding Plymouth's minerals resources	1	0	3	4	0	4	25%	0%	Resource safeguarded for minerals use with some improvements to the relationship between the minerals resource and the buffer incorporated and wharfs safeguarded Chleson Meadow will continue to be important for the management of waste within the City.
PLY06	Improving Plymouth's city centre	2	0	10	12	0	12	17%	0%	Concern about heights of buildings. Desire to see weather protection. Desire for city centre to be a conservation area. Policy too restrictive on student accommodation. Policy should reference buildings of quality. Refer to flood defences. Need to commit to preparing a design code. Support reference to need for a school. Turn Charles Church into a place to visit.
PLY07	CCC	0	0	4	4	0	4	0%	0%	Impacts of proposal on surround assets of heritage value should be considered and building heights should be reduced Colin Campbell House should be retained
PLY08	Royal Parade	1	0	5	6	0	6	17%	0%	Important that alterations to the site respect the historic context of the City Centre including building heights Concerns over building heights A wider range of uses should be supported and further alteration not currently set out in the policy should be considered.
PLY09	Mayflower St East	1	0	4	5	0	5	20%	0%	Money Centre should be included within this site policy Need justification for increase in height/Increase in height (additional stories) may be acceptable however need to be sensitively and subordinately designed, which is not provided for within policy Query over need for student accommodation
PLY10	Cornwall St East	1	0	4	5	0	5	20%	0%	Additional design guidance or conservation area status needed. Should be a single plan covering PLY7-11. Mention importance of Armada Way and retention of non-designated heritage assets. Need justification for significantly increased height. Support policy.
PLY11	Cornwall St West	1	0	3	4	0	4	25%	0%	Mention positive interface with ring road. Need justification for significantly increased height. Support policy.
PLY12	New George Street West	1	0	2	3	0	3	33%	0%	Increase in height (additional stories) may be acceptable however need to be sensitively and subordinately designed, which is not provided for within policy Policy needs to mention primacy of Armada Way and retention of high quality non designated buildings
PLY13	Royal Assurance House	1	0	1	2	1	3	50%	0%	Seek retention of high quality non designated buildings. Support policy.
PLY14	Derrys Cross	1	1	1	3	1	4	33%	33%	Requirement to consider impact on the Crescent tokenistic. Additional reference to preserving significance and setting of crescent needed. Support policy.
PLY15	Civic Centre and Council House	1	0	5	6	0	6	17%	0%	Query the need for the height of the new build What end use(s) will the Civic Centre have?
PLY16	Railway station	5	0	3	8	3	11	63%	0%	Policy should be more ambitious. Student accommodation should be excluded. Remove reference to office quantum. Limit building heights to 6 storeys. Clarity on landmark building needed. Support policy. Support reference to need for a school. Introduce city-wide congestion/ low car occupancy charges to support rail.
PLY17	Plymouth University / College of Art	5	0	3	8	2	10	63%	0%	Policy area boundary should be extended to allow student accommodation. Support policy. Remove significant biodiversity improvements from policy. Limit building heights to 6 storeys. No more student accommodation. Define what high quality building is. Conserve all historic buildings. Explain what enhance means. Support district heating.

Policy	Policy title	Support	Object to overall policy	Object to part of policy	Total reps known - with clear response on the policy	General comments	Total reps	% of total which are supports	% of total which are object to overall policy	Summary of Points Raised
PLY18	History Centre / Tavistock Place / Chapel Street	2	0	3	5	1	6	40%	0%	Limit building heights to 6 storeys. No more student accommodation. Clarify connectivity improvement. Include more detail on parking arrangements for the History Centre. Emphasise mixed use space for business and education. Support policy.
PLY19	Central Park	3	1	2	6	1	7	50%	17%	Supports the policy. Supports policy and would like to include pedestrian / cycle bridge. Would like to see the cricket club field included and stronger commitment to the supporting masterplan. Questions the need for more tall buildings and concerned that future development will damage the Park. Welcomes SUDs but would like to see changes to working to enable 'betterment' to drainage.
PLY20	Managing and enhancing Plymouth's waterfront	8	0	10	18	4	22	44%	0%	General support for policy, particularly with regards to protecting and enhancing historic areas (particularly the Hoe and Barbican) and safeguarding port functions. Some comments seek greater protection for the historic environment and are concerned that enhancing the leisure role of the area could impact on residential amenity. Some comments request greater safeguarding for fishing industry and port functions. Request that policy be improved in relation to flood risk. Request for greater reference to SW Coast Path and National Cycle Network.
PLY22	Cultural quarters	1	0	1	2	0	2	50%	0%	Delivery of high quality visitor accommodation, facilities to deliver major events and improved public realm and waterfront access should be included within the policy
PLY23	Plymouth Fruit Sales site	2	0	1	3	1	4	67%	0%	Welcome safeguarding of fishing industry. Question why Sutton Harbour regeneration broken into smaller sites. Request flood risk provision in policy text.
PLY24	Sutton Road West	0	0	1	1	1	2	0%	0%	Question why Sutton Harbour regeneration broken into smaller sites. Request flood risk provision in policy text.
PLY25	Sugar House	0	0	3	3	2	5	0%	0%	Question why Sutton Harbour regeneration broken into smaller sites. Request flood risk provision in policy text. Suggests re-wording policy to explicitly mention use-classes, including all A-class uses and student accommodation. Suggests changing and removing some provisions.
PLY26	Fish Quay	133	0	3	136	50	186	98%	0%	Significant support for policy - particularly requirement that all development must support/complement the primary fishing industry use of the site. Harbour operator (Sutton Harbour Holdings) objects to wording of the policy, considering it not positively worded and seeks broader range of uses, including hotel and residential.
PLY27	Register Office	0	7	6	13	0	13	0%	54%	Concern about tall building impact on Hoe Conservation Area. Suggestion that policy set limitation on building height. Suggestion that policy conflicts with NPPF and other JLP policies. Suggestion that existing building be retained. Some support for policy provided provision included to Register Office retained in area.
PLY28	North of Cliff Road	1	0	2	3	1	4	33%	0%	Some support for policy. Concern about tall building impact on Hoe Conservation Area. Suggestion that policy should set maximum building heights.
PLY29	Millbay Waterfront	3	0	5	8	0	8	38%	0%	Some support for policy. Increased pedestrian access must not impact on port operation. Concern that more public waterfront access will impact on residential amenity of Millbay Marina. Greater clarity for Trinity Pier proposals sought. Ballard House should be included. Reference to flood risk management sought.
PLY30	Bath Street West	0	0	4	4	0	4	0%	0%	Question viability of ground floor retail. Request including provision for new east/west links through the site. Request provision for flood risk/management.
PLY31	Bath Street East	1	0	2	3	0	3	33%	0%	Request including provision for new east/west links through the site. Request provision for flood risk/management.
PLY32	Stonehouse Barracks	3	0	3	6	1	7	50%	0%	Strongly support public access along the site's coastal path linking Millbay to Devil's Point. Requests addition of provision for new surface water drain.
PLY33	Oceansgate	0	0	1	1	0	1	0%	0%	Request provision for surface water drainage infrastructure.
PLY34	Union Street	1	0	1	2	0	2	50%	0%	Recommend that policy should also acknowledge the low lying nature of the area and contribution towards any strategic drainage opportunities
PLY35	Drakes Island	1	0	2	3	2	5	33%	0%	Requests flood risk strategy/management provision in policy text. Owner's agent requests removal of public access and various changes to text, including in relation to the site's natural environment features and relationship with the SAC and SPA.
PLY36.1	Melville Building	0	0	0	0	1	1	0%	0%	Only one comment that notes proposed use.
PLY36.2	Mount Wise A	1	0	1	2	0	2	50%	0%	Support for policy. Suggestion that policy is not NPPF compliant with regard to historic environment.

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PLY36.3	Mount Wise B	1	0	1	2	0	2	50%	0%	Support for policy. Suggestion that policy is not NPPF compliant with regard to historic environment.
PLY36.5	Broadreach	0	0	1	1	0	1	0%	0%	Supports policy but calls for estimated housing provision to be raised from 60 to 90 homes.
PLY36.6	Brickfields	1	0	1	2	0	2	50%	0%	Supports policy. Wants to see housing or employment development on site at an appropriate scale. Need to limit types of development adjacent to sports sites.
PLY37	Strategic infrastructure measures for the City Centre and Waterfront Growth Area	1	0	5	6	0	6	17%	0%	Breakwater is not part of the city's flood defences Needs more references to flood defences at Breakwater and Millbay Reference needed to Sutton harbour Heritage trail Improved links between city centre and waterfront, more parking, better lighting, design code Transport improvements needed in north and east
PLY38	Derriford Commercial Centre	3	4	4	11	0	11	27%	36%	Support for this as a district centre location but greater flexibility needed The South West Watersite (PLY39) should be allocated instead for a district centre The food retail provisions not justified Policy should reference retail impact assessment from DEVI6 and floor space limits should be set out
PLY39	Glacis Park	2	4	2	8	0	8	25%	50%	This site should be allocated for the district centre Support for the policies restriction on non-food retail Dualling of A386 north of Derriford needed A continuous green corridor should be provided through the site
PLY40	Seaton Neighbourhood	1	0	2	3	0	3	33%	0%	Policy area boundary should be extended. Quantum of employment should be reviewed against PLY38. Include provision for green spaces and screening from FVLR.
PLY41	Derriford Community Park	1	0	2	3	0	3	33%	0%	Supports policy. Objects to the parts of the boundary.
PLY42	Airport	8	17	2	27	0	27	30%	63%	Opposes the policy on grounds that airport is unviable / undeliverable and puts forward alternative garden suburb propositions The policy is rendered unsound by the introduction of a five-year review period which undermines the policy and could lead to its frustration and ultimately the airport site being lost as transport infrastructure. Support for the alternative proposals for the redevelopment of the airport expressed Support for the safeguarding position expressed.

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PLY44	Woolwell urban extension / park	4	7	6	17	2	19	24%	41%	Concern about visual impact, adequacy of school and services, heritage, unnecessary urban expansion and traffic impacts, in particular increasing capacity on the A386 from Woolwell roundabout to Derriford Roundabout Extensive development which is intrusive to the Dartmoor National Park and impacts to wildlife Objections from developers in relation to: restriction of occupancy until Woolwell to George Junction Transport Scheme is implemented, contest the requirement for a Design Code, clarity sought in reference to 40m landscape buffer, some parts inconsistent with the NPPF (biodiversity) SPT2 (places of worship) could be replicated in this policy to support the creation of a new community Identification of pipeline constraints for consideration
PLY46.1 2	Broadley	0	0	0	0	1	1	0%	0%	Identification of pipeline constraints for consideration
PLY46.1 3	Tamerton Road	0	1	0	1	2	3	0%	100%	Seeks clarification whether sports pitch replaced on site
PLY47	Strategic infrastructure measures for the Derriford and Northern Corridor Growth Area	0	0	1	1	2	3	0%	0%	Reopen tamerton foliot station
PLY48	Sherford	1	0	5	6	2	8	17%	0%	Identification of Gas pipe as constraint to development
PLY49	Sherford community park	1	0	2	3	1	4	33%	0%	Supports the policy. Wants more justification for the Community Park, wants to see one café included (not multiple), and wants to see more flexibility on how the SUDS, park, and other land uses are distributed within site. Wants to see historical and cultural aspects reflected in policy.
PLY50	Saltram Meadow	0	0	4	4	2	6	0%	0%	Objection to boundary including part of Historic Park and Garden, the quantum of employment floor space and lack of definition of school size and lack of reference to places of worship Identification of Gas pipe as constraint to development
PLY51	Langage	1	0	1	2	1	3	50%	0%	Southern Access road location should be further defined Concern over traffic impacts Identification of Gas pipe as constraint to development
PLY52	West Park Hill	6	1	2	9	2	11	67%	11%	Require retention Local Green Space Designation Concerns over infrastructure requirements and impact on surrounding area The size of the proposed school should be defined Former Plymouth Airport site is more sustainable than the proposed site given the constraints of the site.

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PLY53	China Clay complex	5	1	2	8	1	9	63%	13%	Support for comprehensive redevelopment Concerns over infrastructure requirements and impact on surrounding area Alternative access measures should be considered Further land should be allocated to aid viability and there are too many policy requirements placed on development SHELAA considered the site unviable and the proposal is unsound Impact on Boringdon Arch Grade II* needs to be considered
PLY55	Hazeldene Quarry	0	0	3	3	0	3	0%	0%	Hazledeane is the main quarry within the city and the operation will be safeguarded from other development that could adversely impact on the resource through minerals inappropriate development. Some improvements through clarification of the resource and buffer zone should be made
PLY56.2	Pomphlett Industrial estate	0	0	0	0	1	1	0%	0%	Identification of pipeline constraints for consideration
PLY56.3	Chelson Meadow	0	0	1	1	0	1	0%	0%	Comment - Chelson Meadow will continue to be important for the management of waste within the City
PLY56.4	Western National site	1	0	1	2	0	2	50%	0%	Support policy but it should include housing and tall buildings
PLY57	Strategic infrastructure measures for the Eastern Corridor Growth Area	1	0	2	3	2	5	33%	0%	Should refer to Laira bridge, needs widening; Proposals for A379 are inadequate; Concern at congestion in Plympton
PLY58.0 1	St Levan Gate	0	1	0	1	0	1	0%	100%	Policy should be deleted no need for medium foodstore
PLY58.0 2	Home Park	0	0	2	2	0	2	0%	0%	Seeks amendments to the policy to recognise ancillary mixed use enabling development uses Seeks expansion of site allocation to include the triangle of land to the west of the Plymouth Life Centre The redevelopment of the stadium should ensure that future capacity is not restricted by other ancillary uses required to make it deliverable.
PLY58.0 4	Tamar Valley School	0	0	0	0	1	1	0%	0%	is there a loss of playing field land that will need to be replaced?
PLY58.0 9	St Levan Road	0	0	0	0	1	1	0%	0%	The site is likely to have contamination issues
PLY58.1 2	Stuart Road	0	0	0	0	1	1	0%	0%	The site is subject to surface water flooding/drainage issues.
PLY58.1 3	MDEC	0	0	0	0	1	1	0%	0%	Need to acknowledge flooding/ drainage issues.
PLY58.1 6	Bull Point Barracks	0	0	0	0	1	1	0%	0%	The name of Site 16 Bull Point Barracks -should be amended in order to clarify that it refers only to a relatively small part of the Bull Point area.

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PLY58.18	Weston Mill	1	1	1	3	1	4	33%	33%	Concerns over the restriction in the policy on bring forward retail store Proposal need meet requirements of Para 74 of NPPF No case for retail proposal and it has potential to impact on existing centres including cumulatively
PLY59.01	Woodlands	0	0	1	1	1	2	0%	0%	is there a loss of playing field land that will need to be replaced?
PLY59.02	Clittaford Road	0	0	1	1	0	1	0%	0%	Reduce site area boundary to housing only.
PLY59.03	Clittaford Road	0	0	1	1	0	1	0%	0%	Tree screening to AONB and country walks required.
PLY59.06	Toshiba	0	0	1	1	0	1	0%	0%	The industrial development must be totally screened from Warleigh Woods and the Tamar Area of Outstanding Natural Beauty
PLY59.11	Ernsettle Lane	1	1	0	2	0	2	50%	50%	Supports the policy. Allocation is contrary to national policy for historic environment.
PLY59.12	North of A38 junction	0	0	3	3	0	3	0%	0%	The amount of development should have been stated as an at least figure in order to be consistent with SPT3 The HIA in that it did not recognise the significance of the Grade II* St Budueax Church, nor does it detail the importance of the forts.
PLY59.14	Clittaford Road	0	0	1	1	0	1	0%	0%	Tree screening to AONB and country walks required.
PLY59.16	140/150 Dunraven Drive	0	0	2	2	0	2	0%	0%	Site area should be expanded.
PLY59.18	Chaucer Way	0	0	0	0	1	1	0%	0%	Any loss of playing field would require replacement.
PLY60.02	Downham School	0	0	0	0	1	1	0%	0%	Any loss of playing field would require replacement.
PLY60.03	Plympton Hospital	0	0	0	0	1	1	0%	0%	Proposals should be supported by appropriate Flood Risk Assessments.
PLY60.06	MOD Turnchapel	0	0	0	0	1	1	0%	0%	Proposals should be supported by appropriate Flood Risk Assessments.
PLY60.07	Undercliff Road	0	0	0	0	1	1	0%	0%	Proposals should be supported by appropriate Flood Risk Assessments.
PLY60.08	Erril retail park	0	2	0	2	1	3	0%	100%	Site should be allocated for retail, car showroom and/or residential
PLY60.09	Plympton House	1	1	1	3	1	4	33%	33%	Seeks increase in housing numbers to be provided on the site. Seeks inclusion of site in conservation area. All of the land should be retained for local green space. Supports the policy but hopes that hard landscaping isn't used on remaining part of site due to drainage problems and to preserve setting of Listed House.
PLY60.10	Newnham Road, Colebrook	0	1	1	2	0	2	0%	50%	Flood risk assessment required. Applications should include masterplan and Strategic Flood Risk Assessment lv2. Site is not suitable, available or achievable.
PLY60.11	Boringdon Park	1	0	2	3	0	3	33%	0%	Supports the policy. Wants to see land at Boringdon Park linked to the Coypool site. Wants to see further consideration given to the historic environment.

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PLY61	Strategic infrastructure measures for the Eastern Corridor Growth Area	0	0	0	0	1	1	0%	0%	Highways England note the proposals.
TTV01	Prioritising growth through a hierarchy of sustainable settlements	8	0	11	19	0	19	42%	0%	Detailed comments on approach to and use of settlement boundaries Ensure that proposals are not only assessed against ability to meet 'local housing needs', and that the wider consideration of contributing to sustainable development needs to form part of decision making. Development strategy within the hierarchy of settlements is not the result of assessment of reasonable alternatives but driven by land availability. Clarification needed over how proposals are required to meet the requirements of policy TTV1, SPT1 and 2. Use of the settlement hierarchy as identified to direct new growth ignores other sustainable locations for new development Not precise enough to be considered 'positively prepared', and could restrict sustainable sites coming forward. The often rigorous and inflexible approach by many Councils in respect of whether development should occur outside settlement boundaries has resulted in Councils not being able to deliver a suitable housing land supply. Concern over distribution of development.
TTV02	Delivering sustainable development in the Thriving Towns and Villages Policy Area	8	0	3	11	1	12	73%	0%	predominantly support, mainly due to policy identifying Affordable Housing and infrastructure as key issues. Policy important for small rural villages. Greater flexibility sought by some for demonstrating sustainability in rural areas and that policy / the JLP should support delivering more housing in rural areas.
TTV03	Strategic infrastructure measures for the Main Towns	2	0	5	7	1	8	29%	0%	suggest additional infrastructure projects to be included. Mainly highways and flood alleviation
TTV04	Spatial priorities for development in Dartmouth	3	0	2	5	0	5	60%	0%	predominantly support, for a variety of reasons. Requests for additional education requirement and for a more pro-active approach to identifying and delivering opportunities to deliver objectives
TTV05	Cotton, Dartmouth	2	1	1	4	1	5	50%	25%	seek strengthening of landscape (AONB) criteria and protection of sports pitches
TTV06	Noss-on-Dart, (Dartmouth)	1	1	9	11	1	12	9%	9%	concern that s106 benefits and AH would be delivered in Dartmouth rather than Kingswear Parish, which is where the site is located. Tighten heritage criteria, water environment criteria and landscape mitigation measures. Conversely simplify policy and allow greater flexibility with respect to uses.
TTV07	Spatial priorities for development in Ivybridge	1	0	2	3	2	5	33%	0%	general support. Specific requests to strengthen by adding reference to transport assessment and expansion of existing schools. DCC does not support new access on to A38
TTV08	East of Ivybridge	0	1	6	7	0	7	0%	14%	adverse impact on highway. Insufficient employment to balance amount of residential. Provide for health. Strengthen landscape criteria
TTV09	Filham	1	7	1	9	0	9	11%	78%	adverse impact on highway. Distant from services. Need Junction to east of Ivybridge. Preference for site to the south of A38
TTV10	Stibb Lane	1	12	0	13	1	14	8%	92%	adverse landscape impact, adverse highway impact, relatively remote from services and risk of flooding make site unsuitable. Process of site identification questioned.
TTVI 1.1	Stowford Mill	1	0	3	4	0	4	25%	0%	support redevelopment of heritage asset and provision of houses. Seek stronger transport, community and heritage criteria. Concern about leaf management and flood risk.
TTVI 1.2	Woodland Road	0	1	1	2	0	2	0%	50%	Seek stronger transport, community and heritage criteria. Concern about highway impact.
TTVI 1.3	Cornwood Road	1	1	1	3	0	3	33%	33%	Seek stronger transport, community and heritage criteria. Concern about highway impact.

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TTV11.4	Dame Hannah	0	2	2	4	1	5	0%	50%	Seek stronger transport, community and heritage criteria. Concern about highway impact and questions whether loss of playing field.
TTV12	Spatial priorities for development in Kingsbridge	1	1	8	10	0	10	10%	10%	recognise significance of road link Kingsbridge to Totnes. mixed use not viable. Objectives too vague and intangible. Policy must address potential impact on AONB, heritage and water environment. Add reference to expanding schools.
TTV13	The Quayside, Kingsbridge	0	0	7	7	0	7	0%	0%	site is AONB, SSSI and provides car parking so should not be redeveloped. It is also an important open space. Need to address flood risk. Site should be improved for public enjoyment. Some support for affordable housing on part of the site. landscape and heritage criteria should be stronger.
TTV14	Belle Hill	0	5	4	9	1	10	0%	56%	site unsuitable due to highway and landscape impact as well as flood risk. Tighten landscape criterion in policy
TTV15.1	West Alvington Hill	0	1	2	3	1	4	0%	33%	reduce boundary to match original (pre application) extent of site. Landscape sensitivity.
TTV15.2	NW Kingsbridge	1	1	2	4	0	4	25%	25%	allocations do not present an appropriate approach to the growth of Kingsbridge in terms of character and landscape. Importance of sound landscape assessment informing policy
TTV16	Spatial priorities for development in Okehampton	2	0	4	6	1	7	33%	0%	some support with several requests for additional objectives and stronger emphasis on the town centre access road, although DCC does not consider the road to be necessary to deliver the plan. Importance of link road ahead of housing to east. Requests for stronger heritage and landscape objectives
TTV17	Exeter Road, Okehampton	1	0	2	3	0	3	33%	0%	support and recognition of importance of employment being delivered ahead of residential. Request for stronger approach to landscape in context of DNP setting.
TTV18	East of Okehampton	5	2	4	11	0	11	45%	18%	strong support. link road (Credition Road to Exeter Road) to precede development. Amend boundary to reduce landscape impact. Use land within allocation for upgraded sewerage system. Strengthen approach to landscape buffer, heritage and education provision.
TTV19	Stockley, Okehampton	0	0	1	1	0	1	0%	0%	concern regarding appropriate access to site
TTV20	Spatial priorities for development in Tavistock	0	0	2	2	1	3	0%	0%	questions deliverability of infrastructure given reliance on TTV21. support for education measures although DCC does not consider maintenance of schools to be an appropriate requirement for new development. K175
TTV21	Callington Road	1	0	4	5	1	6	20%	0%	more detailed reference to education provision and measures to address World Heritage Site. Concern regarding scale of impact of development in Tavistock.
TTV22	Plymouth Road, Tavistock	0	0	2	2	0	2	0%	0%	level of contribution to the railway should be explicit. Employment element confusing and needs to be clarified. Risk of over provision of employment land. Amend and clarify references to landscape and masterplan.
TTV24.1	New Launceston Road	0	0	2	2	0	2	0%	0%	policy to be clearly informed by landscape evidence and to be consistent with SuDS.
TTV24.2	Butcher Park Hill	1	0	2	3	0	3	33%	0%	policy to be clearly informed by landscape evidence and to be consistent with SuDS.
TTV24.3	Brook Lane	0	0	1	1	0	1	0%	0%	policy to be consistent with SuDS.
TTV24.4	The Trendle	0	1	1	2	1	3	0%	50%	policy to be clearly informed by heritage evidence and to be consistent with SuDS.

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TTV24.5	Kelly Preparatory College	0	1	3	4	0	4	0%	25%	policy to be clearly informed by landscape and heritage evidence and to be consistent with SuDS. Clarify scale and nature of development in context of DNP.	
TTV25	Spatial priorities for development in Totnes	1	0	2	3	0	3	33%	0%	highlight need for developer contributions to rural bus services. Policy should be clearer about assessment to address AQMA	
TTV26	KEVICC	0	0	2	2	0	2	0%	0%	no loss of sports facilities. Note pipeline constraint.	
TTV27	Baltic Wharf	0	0	2	2	0	2	0%	0%	policy should include appropriate heritage mitigation measures	
TTV28.1	Dartington Lane	2	0	2	4	0	4	50%	0%	supported. Request for more heritage detail and note pipeline constraint.	
TTV28.3	Transition House	0	0	0	0	1	1	0%	0%	note pipeline constraint	
TTV28.5	ATMOS	0	0	1	1	0	1	0%	0%	more detail with respect to flood risk and contamination as well as contribution towards Totnes Flood Defence Scheme	
TTV28.6	Ashburton Road, Totnes	0	0	0	0	1	1	0%	0%	note pipeline constraint	
TTV29.0 1	Woolacombe Road	0	0	1	1	1	2	0%	0%	adverse impact on transport infrastructure	
TTV29.0 2	South of Woolacombe Road	0	0	1	1	0	1	0%	0%	Objects to the number of homes identified to be delivered in Bere Alston,	
TTV29.0 3	Beacon Park, Dartington	135 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.0 4	Dartington Higher Barton	137 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.0 5	Dartington Foxhole	140 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.0 6	Brimhay	135 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.0 7	Broom Park	145 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.0 8	Higher Tweed Mill, Dartington	134 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.0 9	Sawmills Field	142 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.1 0	Woodlands Yard, Dartington	139 representations for Dartington and this site - most against development									allocations not sustainable development. Too many houses. Development should be elsewhere. Adverse impact on Air quality, heritage, landscape, highways,
TTV29.1 1	Hatherleigh Market	0	0	3	3	0	3	0%	0%	support but requests greater flexibility in mix and quantum of uses. deliverability questioned. Education need. More specific heritage criteria	
TTV29.1 2	Hatchmoor	3	3	1	7	0	7	43%	43%	landowner support. Allocation not justified. Housing is for Plymouth need and there is not adequate infrastructure, specifically health care and education. Adverse impact on biodiversity.	
TTV29.1 3	Glenhaven	0	1	1	2	0	2	0%	50%	significant landscape impact and not likely to come forward until later in plan period. More detailed heritage criteria.	

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TTV29.15	West of Palm Cross, Modbury	73 representations for Modbury and this site - mix of views - housing numbers for Modbury should be reduced, some prefer the JLP sites if any are developed, others prefer sites to east not allocated								support development to west of town as no impact on flooding. Landscape assessment to inform policy. Modbury being overdeveloped / level of development will harm character / social cohesion. Adverse impact on highway
TTV29.16	Pennpark	74 representations for Modbury and this site - mix of views - housing numbers for Modbury should be reduced, some prefer the JLP sites if any are developed, others prefer sites to east not allocated								support development to west of town as no impact on flooding. Heritage assessment to inform policy. Delete western sites and allocate to east of town. Modbury being overdeveloped / level of development will harm character / social cohesion. Adverse impact on highway
TTV29.17	West of Barracks Road	74 representations for Modbury and this site - mix of views - housing numbers for Modbury should be reduced, some prefer the JLP sites if any are developed, others prefer sites to east not allocated								supported as an efficient and effective extension to 29.15. support development to west of town as no impact on flooding. Heritage assessment to inform policy. Delete western sites and allocate to east of town. Modbury being overdeveloped / level of development will harm character / social cohesion. Adverse impact on highway
TTV29.19	Bonfire Hill	1	0	2	3	0	3	33%	0%	support subject to 30% minimum Affordable Housing. Policy to be informed by AONB / landscape assessment.
TTV29.20	Shadycombe	1	0	2	3	0	3	33%	0%	support subject to 30% minimum Affordable Housing. Policy to be informed by AONB / landscape assessment and heritage assessment. Assess and address water quality impacts
TTV29.21	West of West End garage	1	1	2	4	0	4	25%	25%	support an suggest could deliver up to 25 dwellings and that AH should be subject to viability. Would harm AONB
TTV29.22	Green Park Way	0	17	1	18	2	20	0%	94%	evidence base for decision questioned. Stokenham and Chillington are not suitable locations for development. Lack of infrastructure. Adverse impact in AONB. Adverse impact on neighbour amenity. Policy to be informed by landscape evidence.
TTV29.23	SE of Carehouse Cross	0	11	1	12	0	12	0%	92%	site in AONB and better sites exist. Affordable Housing desirable, but little local employment. Site selection process not transparent. Landscape assessment inaccurate. Inadequate infrastructure. Access not safe.
TTV29.24	North and east of Milizac Close, Yealmpton	0	0	1	1	0	1	0%	0%	Additional landscape mitigation necessary
TTV29.25	North of Riverford Farm Shop, Yealmpton	0	0	1	1	0	1	0%	0%	Additional landscape mitigation necessary
TTV30	Empowering local residents to create strong and sustainable communities	6	0	8	14	3	17	43%	0%	supported. Objections to scoring for some villages that have been identified as sustainable. More detail on exception sites needed. More flexibility in figures. Council delivery / monitoring will be important. Lacks clarity on how Neighbourhood Planning will be supported.
TTV31	Development in the Countryside	6	0	13	19	1	20	32%	0%	lacks clarity in how settlement boundary policy will be applied. Questions relationship between rural home and countryside particularly with reference to traffic. Should be more prominence for trees and hedges in JLP. Development in rural areas having adverse impact on tourism. Policy should apply to white areas in PPA. Additional criteria for heritage.
TTV32	Residential extensions and replacement dwellings in the countryside	0	0	6	6	0	6	0%	0%	Clarity required for where this applies. Would be clearer if split into two policies. Does not fully address extensions and would benefit from additional controls regarding size, character and design
DEV01	Protecting health and amenity	3	0	9	12	1	13	25%	0%	Support, although some suggest more detail and clarification necessary and that it must be enforced. Objections include suggestion that policy should only apply where significant adverse impact has been identified and that any matters dealt with in an SPD should not add to the financial burden of development.

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DEV02	Air, water, soil, noise and land	2	0	5	7	0	7	29%	0%	Amend to allow for mitigation with respect to criterion 7. Minor wording change to comply more closely with NPPF. Add reference to tranquility and light pollution and wider reference to impacts on Air Quality Management Areas.
DEV03	Sport and recreation	0	0	6	6	0	6	0%	0%	Does not think it is always possible to provide physical replacement so wants to be able to use CIL/S106. Suggests combining DEV3 and DEV4. Wants to see impact on AONBs to be considered.
DEV04	Playing pitches	1	0	1	2	2	4	50%	0%	Supports the policy. Would like to see link to Infrastructure Needs Assessment, Neighbourhood Plans and OSSR Assesments. Recommends removal of para 3. Suggests combining DEV3 and DEV4.
DEV05	Community food growing and allotments	0	0	2	2	0	2	0%	0%	Should only apply where there is recognised need
DEV06	Hot food take aways in Plymouth	1	1	0	2	0	2	50%	50%	Questions the basis and deliverability of the policy
DEV07	Meeting local housing need in the Plymouth Policy Area	1	0	5	6	1	7	17%	0%	Affordable housing percentage should not have been reduced to 30% - this sends out the wrong message. Affordable housing threshold should not be 10 dwellings - this is too low and will deter small housebuilders. Affordable housing percentage should not be expressed as a minimum
DEV08	Meeting local housing need in the Thriving Towns and Villages Policy Area	1	0	13	14	4	18	7%	0%	Consistency between DEV7 and DEV8 Use of minimum targets for affordable housing on qualifying sites and justification of the percentage sought Seeking commuted sums from small sites in High Value Areas
DEV09	Meeting local housing need in the Plan Area	3	0	10	13	1	14	23%	0%	Affordable housing percentage should be higher Need more innovative methods of delivery There should be a viability reference in the policy Challenge to the concept of commuted sums from larger dwellings in High Value areas.
DEV10	Delivering high quality housing	6	0	12	18	0	18	33%	0%	How do we define high quality? Challenge over the adoption of NDSS
DEV12	Purpose built student accommodation in the Plymouth Policy Area	2	0	5	7	0	7	29%	0%	Policy is considered onerous and should not be so detailed.
DEV13	Consideration of sites for Travellers and Travelling Showpeople	0	2	2	4	0	4	0%	50%	General concern around the evidence base The plan does not set out a 5 year land supply of sites for Gypsies and Travellers
DEV14	Maintaining a flexible mix of employment sites	2	0	2	4	0	4	50%	0%	Changes sought to 'reasonable prospect of a site being used for employment in the future', a time frame and evidence of marketing should be included
DEV15	Supporting the rural economy	4	0	2	6	0	6	67%	0%	Policy should be specific in restricting inappropriate buidlings, particularly where this harms AONB. Criteria could be stronger in this respect, suggesting requirement for assessment.

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DEV16	Providing retail and town centre uses in appropriate locations	1	0	3	4	0	4	25%	0%	Objection to local floor space threshold for impact assessment Floor space threshold for Proposed Derriford Centre should be provided All proposal and allocation in the plan including retail should be subject to sequential and impact tests
DEV18	Protecting local shops and services	2	0	1	3	0	3	67%	0%	Greater protection should be given to loss of stores in centres
DEV20	Place shaping and the quality of the built environment	2	0	9	11	0	11	18%	0%	General support. Some suggestions to strengthen policy. Challenge to use of Building for Life or similar design quality evaluation. Some concerns about tall buildings. Desire to see reference to protected landscapes and biodiversity.
DEV21	Conserving the historic environment	7	0	7	14	0	14	50%	0%	DEV21 and 22 to be combined to better reflect guidance in NPPF and local circumstances
DEV22	Development affecting the historic environment	6	0	9	15	0	15	40%	0%	DEV21 and 22 to be combined to better reflect guidance in NPPF and local circumstances
DEV23	Cornwall and West Devon Mining Landscape World Heritage Site	0	0	3	3	0	3	0%	0%	Add reference to enjoyment of heritage assets. Minor amendments and additional criteria to better reflect the recently adopted SPD and to better describe the wider WHS (outside West Devon) for context.
DEV24	Landscape character	5	0	4	9	0	9	56%	0%	Supports the policy. Wants to see more weight given to AONBs. Considers the policy to be over-restrictive. Suggest including references to water-courses. Suggests minor text edits and reference to European landscape convention.
DEV25	Undeveloped coast	5	0	5	10	0	10	50%	0%	Punctuation/grammar corrections; Correct reference to Shoreline Management Plan (omit "2"); Add reference to Heritage Coast (not covered elsewhere in the plan); Addition of clause: 'enables the ongoing adaptation of biodiversity to climate change in accordance with the policies as set out in the Shoreline Management Plan'
DEV26	Strategic Landscape Areas (Plymouth Policy Area)	3	1	3	7	1	8	43%	14%	Supports the policy. Considers that the policy is not based on sufficient evidence and is inconsistent with national policy. Minor text amendments suggested to improve consistency within the Plan. Unspecific concern about how policy relates to TTV policy area.
DEV27	Nationally protected landscapes	8	0	3	11	0	11	73%	0%	Supports the policy. Suggests text amendments suggested to make policy consistent with NPPF. Unspecific concern about how policy relates to TTV policy area.
DEV28	Protecting and enhancing biodiversity and geological conservation	2	0	10	12	0	12	17%	0%	Supports the policy. Text amendments suggested to make policy consistent with NPPF and to clarify hierarchy relating to protected sites and species of principal importance. Suggests that there is ambiguity between PLY44 and DEV28 leading to potential inconsistency of approach. Would like to see the addition of intertidal habitats to the list of priority habitats.
DEV29	Green and play spaces (including Strategic Green Spaces, Local Green Spaces and undesignated green spaces)	3	0	5	8	1	9	38%	0%	Supports the policy. Wants to see further consultation on green space. Would like to see inclusion of historic environment. Would like policy to consider how spaces can provide multi-functional benefits. Questions the JLP's approach of designating all types of greenspace as lacking clear methodology being unnecessary, duplicating the NPPF and that it should be removed.

Policy	Policy title	Support	Object to overall policy	Object to part of policy	Total reps known - with clear response on the policy	General comments	Total reps	% of total which are supports	% of total which are object to overall policy	Summary of Points Raised
DEV30	Trees, woodlands and hedgerows	4	0	3	7	2	9	57%	0%	Supports the policy. Would like to see inclusion of historic orchards and hedgerow trees. Wold like to see inclusion of ancient woodland and ancient wood pasture - but provision of compensation would not apply. Concern about ongoing maintenance costs of treeplanting. Pleased to see acknowledgement of role of trees in climate change adapation and other benefits they provide. Incorrect reference to NPPF paragraph number.
DEV31	Specific provisions relating to transport	1	0	7	8	1	9	13%	0%	Policy should be strengthened to enable refusal of planning permission where impact is not adequately mitigated. Extend the Policy to ensure protection of rural landscapes, historic and built environment and local distinctiveness. Extend the Policy to cover climate change and inter town transport routes.
DEV32	Meeting the community infrastructure needs of new homes	1	0	2	3	0	3	33%	0%	Concerns raised about the extent to which the JLP supports the role of Neighbourhood Plans
DEV33	Waste management	1	0	1	2	0	2	50%	0%	The relationship between the Devon Waste Plan and the Joint Local Plan should be clarified.
DEV34	Delivering low carbon development	4	0	18	22	0	22	18%	0%	Low Carbon targets should be applied for South Hams and West Devon Policy is overly restrictive and inflexible Various detailed points about the clauses of the policy
DEV35	Renewable and low carbon energy (including heat)	2	0	22	24	0	24	8%	0%	Many consider policy and criteria not robust and several criteria ambiguous. Requests greater restriction in AONB and Undeveloped Coast. Amend wording / additional criterion to reflect heritage criteria in NPPF and include landsape capacity. Should be reference to cumulative effects. Only seems to protect designated landscapes / habitats / heritage assets from inappropriate development. Relationship of criteria unclear. Should say may be supported not will.
DEV37	Managing flood risk and water quality impacts	4	0	5	9	0	9	44%	0%	Surface Water Flooding should be taken into account with as equal importance as Flood Zones The appropriateness of the order of the drainage hierarchy is questioned
DEV38	Coastal Change Management Areas	4	0	1	5	0	5	80%	0%	CCMAs should be shown on Policies Map Amendment to point 5 sought to ensure that this relates to all buildings and structures, not just dwellings
	Omission sites (Plymouth Policy Area)				42		42			Various omission sites submitted to the Pre Submission Consultation
	Omission sites TTV Policy Area)				58		58			Various omission sites submitted to the Pre Submission Consultation
	Omission policies				6		6			Suggested: Active Design generic development policy for Plymouth; development in settlements which are not sustainable villages; Dartington Special Policy Area; community facilities; contributions to rail infrastructure
	Bickleigh / Woolwell				80		80			Mainly concerned with landscape protection to north of Woolwell site and seeking Strategic Landscape Area designation; some reps on LGS issues within / near allocation
	Tamerton Foliot				73		73			Mainly supporting protection of green spaces in area
	Bratton Clovelly				17		17			Relates to status as sustainable village and development potential
	Ringmore				15		15			Relates to status as sustainable village and development potential
	Rattery				24		24			Relates to status as sustainable village and development potential

APPENDIX VII: LIST OF DEPARTMENTS, ORGANISATIONS, COMPANIES AND LOCAL COMMUNITY GROUPS WHO SUBMITTED COMMENTS

A&M Trust

ADG

ADPAD

Aggregate Industries

Airey and Coles Consulting Engineers

Akkeron Group

Altitude Asset Management Ltd

Andrew Lethbridge Associates

AONB Partnership Committee

Apple Barn UK Ltd

Architects Design Group

Associated British Ports

Australian Government Port Marine ISM Coordinator

B&W Electrical Services

Barratt David Wilson Homes

Barratt Homes, DJ Lane, BJ Lane, and AWT Lane

Barwood Land, the Maristow Estate, Hannick Homes and Mr W Hitchins

Bell Cornwell

Bere Ferrers Parish Council

Berry Pomeroy Parish Council

Bickleigh Parish Neighbourhood Plan

Bigbury Parish Council

Bloor Homes

Blue Cedar Homes (BCH)

Bovis Homes

Bramley Homes Ltd.

Bratton Clovelly Parish Council

Brighton & Newhaven Fish Sales

Brixham Peninsula Neighbourhood Plan

Brixton Parish Council

Buckland Monachorum Parish Council

Buckland Tout Saints Parish Council

Cavanna Homes

Celtic Fish & Game

Certas Energy Ltd

Channel & West Sustainable Trawling Group

Charles Stanley

Charterlands

Chillington Housing Action Team

Church Farm Estate

CityBlock

Client Group

Consols Oils Ltd

Coombe Fisheries Ltd

Co-operative Group Ltd

Cornish Bay Limited

Cornish Fish Producers Organisation

Cornwall Transport Ltd

Councillor - Marldon

Courtgate Ltd.

CPP London Properties Ltd

CPRE South Hams
CPRE Torbay
Dartington Neighbourhood Plan
Dartington Parish Council
Dartmoor National Park Authority
Dawnan Ltd.
Design Development Chartered Architects
Devon and Cornwall Business Council
Devon and Cornwall Farmers Limited (Landowner)
Devon Chamber of Commerce and Industry
Devon County Council
Devon Stone Federation
Diocese of Exeter
Diocese of Plymouth
Dittisham Parish Council
Don't Bury Dartington Under Concrete
Drake Circus Limited Partnership
East Allington Parish Council
Educationa and Skills Funding Agency
Elburton & District Residents Association
Elite Frozen Foods Ltd
Environment Agency
Fal Fish
Fishing Vessels
FlyPlymouth Ltd
Foot Anstey LLP
Forestry Commission, SW Area Team
Friends of Central Park Plymouth
Friends of Dartmouth Community Orchard
Friends of Ham Woods
Gael Force Marine Equipment Ltd.
Gael Force Marine Ltd
Galliford Try
Gladman Developments
Grevan Ashmont Retirement
Harberton Parish Council
Harding & Sons Limited
Harrison Sutton Partnership
Hatherleigh Town Council
Health and Safety Executive
Highampton Neighbourhood Plan Group
Highampton Parish Council and NPG
Highways England
Historic England
Hoe Gardens Residents' Association
Hoe Neighbourhood Forum and Hoe Conservation Area Residents' Association
Home Builders Federation
Howeson
HSE Hazardous Installations Directorate
IF limited
Imerys Minerals Ltd
Independent
Interfish limited

Interfish Producer Organisation
Interfish Wirons Limited
Ivybridge Cricket Club
Ivybridge RFC
Ivybridge Town Council
JLL
Kentucky Fried Chicken (Great Britain) Limited
Kingsbridge Action Group
Kingsbridge plastic free campaign
Kingsbridge Town Council
Kingston Parish Council
Kingswear Neighbourhood Plan group
Kingswear Parish Council
Kingswood Homes UK Ltd
Land Value Alliances (LVA)
Langage Energy Park Ltd
Leach Fishing Enterprises
Linden Homes
Loddiswell Parish Council and Neighbourhood Planning Group
London and Devonshire Trust
Low Energy Building Practice
Macegreen Consulting
MACKPlan Neighbourhood Planning Team
Marisco Fish Ltd
Maristow Estate
Marldon Parish Council
Marshmills Ltd
Maze
McCarthy and Stone Retirement Lifestyles Ltd
Mevagissey Harbour Trustees
Mevagissey Wet Fish
Millbay Marina Village Residents Association
Mills Bakery Royal William Yard
Millwood Homes
Milton Abbot Grouped Parish Council
Miss D Everson of The Bungalow, Mill Yard, Lee Mill
Moby Nicks Limited
MOD
Modbury Neighbourhood Plan Group
Modbury Parish Council
Modbury Society
Moorhaven LTD
Mount Wise (Devon) Limited
Mr Bowman of Oaktree Cottage, Holsworthy Road, Hatherleigh, EX20 3LE.
National Grid
National Marine Aquarium
National Trust
Natural England
Network Rail
Newlyn Fish Co.
Newton & Noss Parish Council
NHS
none

North Tawton Neighbourhood Plan & North Tawton Town Council
Octopus Publishing Group
Okehampton Hamlets Parish Council
Okehampton Town Council
On behalf of Mount Kelly College
OPERATION HENRY
Paignton Neighbourhood Plan Forum
Paramount 23 Ltd
Park Pharmacy Trust
Parochial Church Council of Dartington
Paul Atkins Fishmongers LTD
Paul Hunt Developments (Devon) Ltd.
Penninsula Properties
Persimmon
Peter Heard
Place Land LLP
Plymouth Albion Rugby Club
Plymouth City Centre Company
Plymouth City Council - Economic Development
Plymouth Civic Society
Plymouth Civil Society
Plymouth College of Art
Plymouth Energy Community
Plymouth Manufacturers' Group
Plymouth Manufacturer's Group
Plymouth Marine Laboratory
Plymouth School of Creative Arts
Plymouth Trawler Agents Ltd
Plymouth Tree Partnership
Plymouth Waterfront Partnership BID
Plympton House Limited
Plympton St Mary Neighbourhood Forum
Plympton St. Maurice Civic Association
Polperro Fish Company
Premier Marinas (Dart) Limited
R Paine and Southern Properties
Rattery Parish Council/Rattery Parish Plan Steering Group
Rattery PC and Rattery Parish Plan Steering Group
Rex Down Wholesale Fish Merchants Ltd
RG Seafoods
Rotolok (Holdings) Ltd.
Royal Navy
RSPB
S&P Trawlers Ltd
Salcombe Neighbourhood Plan Group
Salcombe Town Council
Save Bantham Coalition
School of Environment and Technology
SD Solution
SHDC
Sheet Anchor Investments Limited
Skipper mfv Freedom
SM Group (Europe) Ltd.

South Devon Area of Outstanding Natural Beauty
South Devon College
South Devon Rural Housing Association
South Hams Planning
South Hams Society
South Hams Tree Wardens Network
South West Coast Path Association
South West HARP Planning Consortium
South West Strategic Developments
South West Water
Sport England
Stoke Fleming Parish Council
Stoke Gabriel Neighbourhood Plan
Stoke Gabriel Parish Council
Stoke Gabriel Parish Plan Group
Stokenham Parish Council
Stowford and Lewdown Turbine action group (SALTAG)
Strete Neighbourhood Plan
Stride Treglown
Strongvox Homes
Stuart Partners
Stuart Properties Ltd
Sunnybanks Homes
Sutton Harbour Holdings plc (SHH)
SW Devon Community Energy Partnership
Swallows' Flight
Tamar Valley AONB
Tamerton Foliot Village Conservation Society
Taylor Wimpey
Taylor Wimpey (Exeter)
The Dartington Hall Trust
The Maristow Estate
THE ROYAL LONDON MUTUAL INSURANCE
The Sherford New Community Consortium
The Stairways and Dove groups of Ivybridge
Theatres Trust
Thurlestone Parish Council and Neighbourhood Plan
Torbay Council
Totnes Allotments Association
Totnes Neighbourhood Plan
Trelawney Fish
Trustees of the Cann Estate
Two Valleys Community Energy
UGBOROUGH ND PLAN WORKING GROUP
University of Plymouth
Urban Spash
Urban Splash
Veasey & Sons Fishmongers
Vicarage Park Ltd
Vice Chairman (International Projects) UK Committee for UNESCO MaB Programme
Victory Fishing Ltd
W.JAMES & SONS
Waddeton Park Ltd

Wainhomes (South West) Holdings Ltd.
Walker Developments Ltd
WARM:Low Energy Building Practice
Wembury Parish Council
Wharfside Properties Ltd (on behalf of Aviva)
Woodland Trust



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West Devon
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Council

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