APPENDIX XIV
INTRODUCTION
This report sets out how people got involved with the Plymouth and South West Devon Joint Local Plan (JLP) engagement which ran from 9 November to 21 December 2016. Across the JLP area, nearly 300 comments were received which will be used to inform the final Plan.

To view all the comments which were submitted during this period please visit: http://plymouth.objective.co.uk/portal/planning/jlp/

This report summarises the comments received on the two documents which were out for consultation:

- A topic paper: **How did the local authorities decide upon the distribution of development in the Joint Local Plan?**
- A document showing new sites which have been identified and considered for development since the July 2016 consultation.

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WHAT IS THE PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN?
The Plymouth and South West Devon Joint Local Plan (JLP) is a joint local plan between Plymouth City, South Hams District and West Devon Borough Councils. The JLP will set out the overarching strategy for the area, setting out where development will take place, what areas should be protected, and how the area will change through to 2034.

The JLP brings together work that has already been carried out separately by the councils on the Plymouth Plan, South Ham’s ‘Our Plan’ and West Devon’s ‘Our Plan’. 
It will create single objectives and policies whilst retaining each Council’s individual identities. The strategy and policies of the Plymouth Plan will therefore be carried forward into the JLP and the same for the vision and themes in the South Hams and West Devon Our Plans.

CONSIDERATIONS

Considerations was the second phase of engagement on the JLP and ran from 9 November to 21 December 2016.

The three councils, Plymouth City, South Hams District and West Devon Borough asked for comments on two documents which were out for consultation:

- A topic paper: How did the local authorities decide upon the distribution of development in the Joint Local Plan?
- A document showing new sites which have been identified and considered for development since the July 2016 consultation.

Altogether 254 comments were made by 160 contributing consultees on the topic paper and 43 comments were made on the extra sites by 42 contributing consultees.

- Please see Appendix I for a summary of the comments received on the housing distribution topic paper.
- Please see Appendix II for a summary of the site specific comments in the Plymouth Policy Area.
- Please see Appendix III for a summary of the comments received in the Thriving Towns and Villages Policy Area.
- Please see Appendix IV for a summary of the comments received on the new proposed local green space sites.
- Please see Appendix V for a list of the new sites which were put forward during the consultation.
- Please see Appendix VI for a summary of the comments received which do not necessarily relate to any specific sites.

HOW PEOPLE GOT INVOLVED

In Plymouth:

- The Plymouth Plan team attended various meetings and gave presentations to raise awareness of the plan.
- Social media was used to promote the consultation.
- Posters advertising the consultation were put on all the buses in the city.
- E-newsletters were sent out to 4,901 e-mail addresses.
- 2,687 Letters were sent out to people who had previously been involved but do not have e-mail addresses.
- Paper copies of all consultation materials were made available in all libraries in Plymouth and the Council’s First Stop Shop.
In South Hams and West Devon:

- Engagement events were held at:
  - Bratton Clovell
    - Thursday 24/11/16  10am – 1pm Village Hall, Bratton Clovelly
    - Saturday 03/12/16  10am – 1pm Village Hall, Bratton Clovelly
  - Exbourne
    - Saturday 10/12/16  9.30am – 12.30pm The Burrow, Exbourne
    - Monday 19/12/16  9.30am - 12.30pm The Burrow, Exbourne
- Twitter and Facebook was used to promote the consultation.
- E-bulletins were sent out.
- Letters were sent out to people who had previously been involved but do not have e-mail addresses.
- Paper copies of all consultation materials were made available at the locations below:

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<tr>
<th>West Devon</th>
<th>South Hams</th>
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<tr>
<td>West Devon Borough Council</td>
<td>South Hams District Council,</td>
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<td>Kilworthy Park, Tavistock</td>
<td>Follaton House, Totnes</td>
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<tr>
<td>West Devon Borough Council</td>
<td>Ivybridge Town Council,</td>
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<td>One stop shop, Okehampton</td>
<td>The Watermark Centre, Ivybridge</td>
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<td>Tavistock Town Council, Drake Road</td>
<td>Kingsbridge Town Council,</td>
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<td>Tavistock</td>
<td>Quay House, Kingsbridge</td>
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<td>Okehampton Town Council, Town Hall</td>
<td>Dartmouth Town Council,</td>
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<tr>
<td>Okehampton</td>
<td>The Guildhall, Dartmouth</td>
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<td>Totnes Town Council,</td>
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<td>The Guildhall Offices, Totnes</td>
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**WHO GOT INVOLVED?**

Overall 83 different departments, organisations, companies and local community groups got involved and submitted comments during this engagement phase. We would like to thank all who submitting representations and we look forward to working with them as we continue to develop the Plymouth and South West Devon Joint Local Plan.

- Please see **Appendix VII** for a list of the different stakeholders who commented on the Plan.

**WHAT HAPPENS NEXT?**

The Plymouth and South West Devon Joint Local Plan is following the timetable below:

- Draft Joint Local Plan published March 2017
- Submission of the Joint Local Plan to the Planning Inspector, May 2017
- Public Examination, Autumn 2017
- Adoption by the three councils, Winter 2017

If you have any questions please get in touch by e-mailing Plymouth: plymouthplan@plymouth.gov.uk or by e-mailing South Hams and West Devon: strategic.planning@swdevon.gov.uk
APPENDIX I: SUMMARY OF COMMENTS RECEIVED ON THE HOUSING DISTRIBUTION TOPIC PAPER

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<th>Organisation/Consultee</th>
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| Blue Cedar Homes       | • Need to respond positively to meeting demographic needs across the entire Plan area.  
                          • Need to ensure that smaller rural communities are able to meet their own changing demographic needs. There is a recognised substantial shortfall for housing that is suited for over 55s and particularly over 85s in rural communities.  
                          • A positively worded policy needs to be included to promote housing for older people within the small and large villages throughout the plan area. |
| Boyer Planning         | • Support the preferred option with the focus on the growth of Plymouth. |
| Bratton Clovelly Parish | • More people travel from Bratton Clovelly to Exeter rather than Plymouth.  
                          • Glad to note the value of services and public transport links available in Okehampton to the wider rural community and fully emphasise its key role in serving those on the northern periphery of the Plan area.  
                          • No mention of a policy to ensure affordable housing for local people.  
                          • Will there be a policy to prevent purchase of new dwellings as second homes? |
| Buckland Tout Saints Parish Council | • Broadly support the conclusions reached and the reasoning that underpins the “Preferred Option”, welcome the clarity and structured approach it brings.  
                          • Neither of the two hamlets (Goveton and Ledstone) would score greater than 6 in the SHWD Sustainability Assessment Framework” and can only contribute to “windfall development” (housing) and a Neighbourhood Plan is not justified.  
                          • Need to ensure employment is addressed in the final document.  
                          • Future process for coordinating development of sites such as the Torr Quarry Industrial Facility and the role and responsibilities of all the relevant bodies should be fully defined as part of the Plan, without clarification there is a risk that the process would become unsustainable and/or undermined. |
| Cavanna Homes          | • Support the acknowledgement to meet the needs identified in the Housing and Economic Development Needs Assessment (HEDNA) in full. However the Objectively Assessed Need (OAN) should be regarded only as a minimum requirement to ensure flexibility to provide opportunity for development beyond sites which will be allocated.  
                          • Support the preferred development strategy. |
| Co-operative Group Ltd | • The plan-making process remains disconnected and are awaiting the combination of strategic retail policies and site specifics in one document.  
                          • Agree with the broad principles.  
                          • No site allocations should pose a threat to local centres.  
                          • New larger format convenience goods floorpace should be limited to the residual capacity identified in the July 2016 Retail Study.  
                          • The only large store planned for should be for Derriford District Centre.  
                          • Existing network of local centres need to be sustained.  
                          • Proposed additional supermarket sites at Keyham and Weston Mill should instead be redeveloped for housing refucing greenfield release elsewhere in the Plan area. |
| Dartmouth Town Council | • Don’t accept that the move from three plans to one represents an advantage in local planning terms.  
                          • The new Plan should not be uniformly dominated by Plymouth.  
                          • Distance and isolation should be reflected in a gradation of policy.  
                          • Need to reflect the variable strength of cross-boundary influences from adjoining authorities.  
                          • Adoption of a Plymouth Housing Market Area (HMA) for the whole area would be a distortion and would not strengthen the voice of Dartmouth in the wider region.  
                          • Will unduly emphasise the isolation of Dartmouth without recognising recent improvements.  
                          • Dartmouth is not part of a Plymouth sub-region.  
                          • Remote areas should not be forced into a role of commuter place or source of occasional shopping and entertainment visitors. |
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<td>Plymouth’s sub-regional influence is exaggerated by incorporating the eastern parts of South Hams and the northern parts of West Devon. These areas should be subject to local planning policies which aim to create independently functioning places with a degree of self-containment, achieved through Neighbourhood Plans as part of the JLP.</td>
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<td>Disappointed that little reference is made to how remote towns and villages are to be maintained as centres of employment as well as housing.</td>
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<td>The housing built may not help the local community if they’re unaffordable and if they’re not restricted on their role as second and holiday homes.</td>
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<td>The restraining effect of the Area of Outstanding Natural Beauty (AONB) considerations may have to be over-ridden where options are limited. The quality of the environment in the area is high and must be protected but rural social deprivation also needs to be addressed too if smaller places are to be made “sustainable”.</td>
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<td>Unclear what is meant by the intention to create “places that respond positively to their surroundings”, especially as it’s followed with “regardless of location” people will be enabled to turn new places, (including those “within rural towns and villages”) into thriving communities. It is difficult to reconcile this worthy intention with the experience of Dartmouth’s West Dart development.</td>
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<td>Not acceptable to write new objectives for the whole area when the area is incoherent. Economic and social drivers are inadequate.</td>
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<td>A mixture of policy approaches should be applied according to local conditions and preferences or options become less distinct and blurred.</td>
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<td>Support conclusion of paper but disagree with claims on Dartmouth. Appropriate workable locations are available for development.</td>
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<td>Car parking is an issue in Dartmouth and infrastructure is not mentioned in the paper.</td>
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<td>The quantity of development Dartmouth might expect to accommodate should be constrained only by whether it can be growth that meets sustainability criteria including access to local jobs.</td>
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<td>Agree with the Plymouth Policy Area but Thriving Towns and Villages as a policy area is more problematic as it just refers to the rest.</td>
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<td>Emerging conclusions are on the right lines, but need to be as flexible as possible in the context of the remote rural locations and the unique historic settlements.</td>
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| Devon County Council | |
|----------------------|**Urban Intensification** – another opportunity would be to reduce the need to travel. |
| Dispersal of development – significant development at the smaller towns and villages could be difficult to serve if significant infrastructure/improvements are needed and will increase the need to travel and very challenging to serve smaller towns and villages with commercial public transport. |
| The Plan will need to address minerals issues including the safeguarding of mineral resources. |
| Outside of the city will need to have regard for the emerging Devon County Council Minerals Plan. |
| Options which favour concentration in Plymouth should take account of the need to safeguard existing quarry and wider limestone resource north of Plymstock from sterilisation or constraint. |
| Options which envision growth in Plymouth and adjoining parts of South Hams need to avoid constraint of the Drakelands Mine. |
| The emerging Mineral Plan provides for a lateral extension of the Mine and there may be scope for further expansion to the south west – any buffer may overlap the Planning Policy Area and should be recognised. |
| Yealmpton is constrained by the presence of limestone to the south and east. If it’s considered for growth, an assessment should be undertaken to establish its economic potential. |
| Devon County Council will need to play a lead infrastructure and planning role related to any development outside the PCC boundary, given its role as Highway Authority, Education Authority, and Minerals and Waste Planning Authority for the area. |

<p>| Environment Agency | No concerns. |
|--------------------| The preferred dispersal policy could be used to justify the areas of search for the application of the flood risk sequential test. |</p>
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| Fowler Architecture and Planning Ltd | • Somewhat retrospective in nature.  
• Support options that give primacy to the local centres in the development strategy. These centres are strategically important and are capable of growth.  
• The JLP remains unclear in justifying the amount and overall distribution of development. |
| Friends of Ham Woods | • Appears to devalue the natural environment and greenspaces.  
• Need to ensure urbanism doesn’t detract in the availability of greenspace or the valuable green habitats that exist in an urban environment.  
• Population increase and increased urbanisation is not sustainable. |
| Gladman Developments Limited (Richard House) | • An appropriate level of development is essential for all settlements.  
• Need to ensure that the market towns and larger villages within the JLP area are given sufficient growth to retain and enhance their service offers as well as contributing to meeting housing needs.  
• Allocation of development in Plymouth, towns and villages should not be at the expense of allowing proportionate growth opportunities to come forward in lower order settlements.  
• Proportional growth should be allowed or will lead to an ageing population and decline in services in rural communities.  
• The JLP will need to consider that the most sustainable way for rural areas is through the appropriate release of sustainable greenfield sites.  
• The widest range of sites by size and market location is required to maximise housing supply. |
| Highampton Neighbourhood Planning Group | • Support the broad intentions of the objectives and preferred options.  
• More thought/effort should be put into investigating and promoting a new site/town near Plymouth.  
• Confused about the status of the HEDNA - needs to be brought forward before the March consultation so there is time for it to be read, digested and assessed as soon as possible. |
| Highways England | • Development proposals are unlikely to be acceptable if they increase demand for use of a road section that is already operating at over-capacity levels or cannot be safely accommodated.  
• The JLP should be in line with the National Planning Policy Framework (NPPF) paras: 32; 162; 173; 177 and 181.  
• Will need to satisfy the requirements of the NPPF and be supported by an assessment of the infrastructure necessary to ensure that traffic impacts were not severe. |
| Mrs Flo Watts (Kingston Parish Council) | • Strongly support the “Preferred option” section concerning local centres and villages.  
• Support the principle of affordable housing, and the existing local lettings plan.  
• Currently writing their Neighbourhood Plan.  
• Any proposed future development for Kingston will need to be with full consultation of the local community.  
• The village does not have the community facilities or infrastructure to support a major development. |
| Linden Homes | • Broadly agree with the principles.  
• Concerned that inadequate assessment has been undertaken on the potential to deliver a greater proportion of the housing needs within the Plymouth area.  
• Further objective assessment of the land is needed.  
• Defeatist and premature to suggest that Plymouth will struggle to find enough sites for development opportunity with community support.  
• All sites within Plymouth should be objectively assessed to establish the full scale of development that can be accommodated to meet the needs of the City.  
• Concerned with the process and outcomes of the assessment which has been undertaken.  
• Land adjoining existing built up areas of the City are more sustainable locations for new development.  
• Because land is greenfield doesn’t mean it couldn’t accommodate sustainable development.  
• Suitable development land is being overlooked.  
• Consultation papers are not clear which areas are within the city boundary.  
• An unnecessarily large proportion of Plymouth’s needs are being transferred outside of the City’s
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| National Trust         | • No objection to housing distribution.  
                          • If a balanced approach is adopted with development taking place over the plan area then the implications for sensitive locations needs to be fully understood with an evidence based assessment of the likely landscape implications. |
| Natural England        | • Housing options should be tested against the sustainability objectives as part of the Sustainability Appraisal process which would ensure its integrity to the plan making process.  
                          • Page 10 should be reworded to conserve landscape and scenic beauty in the AONB rather than avoid harm and extend to the setting of the AONBs and Dartmoor National Park.  
                          • There’s likely to be the need for development in protected areas - the JLP will need to determine that the anticipated level of growth can take place whilst conserving and enhancing protected landscapes and that the requirements of the NPPF are met.  
                          • Page 12 objective should include sites of international importance and recognise designated geodiversity interests.  
                          • Want clarification on page 37 as it suggests the Plan will identify and designate additional areas to protect sensitive landscapes.  
                          • The findings of the Habitats Regulations Assessment should be reflected in the Sustainability Appraisal process.  
                          • Clarification is needed for the matrix at the back. |
| Network Rail           | • The Local Planning Authorities (LPA) must notify Network Rail of any applications within 10m of railway.  
                          • The JLP should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.  
                          • Many stations and routes are already operating close to capacity, a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.  
                          • Would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development: it’s appropriate to ask for developer contributions.  
                          • To fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.  
                          • Would not seek contributions towards major enhancement projects which are already programmed as part of Network Rails remit.  
                          • Need to think of impact on level crossings and possible effect on train times.  
                          • Request that the potential impacts from development affecting Network Rails level crossings, is specifically addressed through planning policy. There have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. |
| Okehampton Town Council| • Plan should include a policy to prioritise brownfield over greenfield.  
                          • How will the Plan frame policies to assist progression towards thriving communities?  
                          • Plan should specifically include the construction of Okehampton Town Centre Access/Relief Road as a priority. |
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<td>Persimmon Homes</td>
<td>• Support. The locations specified can support an appropriate and proportionate level of growth over the plan period.</td>
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| Plymouth Civic Society | • The proposed strategic objectives do not cover historical and heritage aspects adequately due to the limited contextual use of the word ‘environment’.  
• Suggest an additional section (alongside Economic, Social and Environment) for History and Heritage.  
• Need a strong policy to protect. |
| RSPB (Royal Society for the Protection of Birds) | • Disappointed that the topic paper does not fully state the importance of many of the sites of nature conservation.  
• Doesn’t clarify that some of the sites are of more than national importance (Special Areas of Conservation (SAC), Special Protection Areas (SPA)).  
• Overarching conclusions do not include the requirement to avoid harm to the natural environment.  
• No mention of the need for restoration and creation of habitats, in line with NPPF requirements - this will weaken the Plan. Recommend more ambitious objectives in relation to safeguarding and enhancing the natural environment, which includes all statutorily protected sites of nature conservation. |
| Savills | • Broadly supportive.  
• If planning policies are too restrictive then local housing and employment needs will not be addressed.  
• House prices will remain too high and local people will be priced out.  
• Any criteria based policies should seek to facilitate rather than prevent the development required to meet local needs in smaller rural settlements.  
• Look to Policy SS2 of the South Somerset Local Plan as an example which recognises how ‘clusters’ of settlements function together to share services.  
• Settlement boundaries should not be continued to be used as a tool for guiding decisions on the sustainability of development proposals. Decisions should rather be made by informed judgement.  
• Use of development boundaries in local plans are not encouraged by the NPPF. |
| Sherford New Community Consortium | • Support the emerged preferred option for development distribution. |
| South West HARP Planning Consortium | • LPAs should recognise the ever-increasing need for true affordable housing to meet the need by taking a flexible approach to encouraging delivery of all tenures.  
• The Plan needs to ambitiously plan to meet affordable housing need across the three local authority areas. Failure to do so will inevitably cause further deterioration in the delivery of affordable housing, placing many more families on ever-increasing housing waiting lists.  
• Would support a dispersed approach which enables additional affordable housing to be delivered in rural areas according to levels of local need, supporting households in need in those areas, as well as supporting the economic vitality and viability of those areas. |
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<td>South West Strategic Developments Limited</td>
<td>• Important for the LPAs to consider the local need for affordable housing and whether to seek to apply local thresholds that support delivery of affordable housing even on ‘smaller’ sites as current NPPF guidance is reducing the delivery of affordable housing.</td>
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<tr>
<td>South West Water</td>
<td>• More explanatory than setting out a credible planning strategy for the JLP area. • Focus should be on the ‘Urban Intensification - within Plymouth admin boundaries’ - this will focus development where it is most needed. • Does not tackle the Objectively Assessed Need.</td>
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<td>Tamerton Foliot Village Conservation Society (TFVCS)</td>
<td>• Developers of proposed sites need to approach South West Water to review available capacity of their infrastructure.</td>
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<td>Taylor Wimpey</td>
<td>• Support the focus of development in Plymouth.</td>
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<td>Trustees of the Cann Estate</td>
<td>• Generally supportive of the preferred option and the split of the two policy areas and proposal to expand the plan boundary for Plymouth. • Preferred option is similar to the ‘urban concentration’ alternative. Of the various ‘policy options’, a balance of options one and two is most appropriate. (1. Concentration on Plymouth and adjoining settlements – necklace of settlements/garden villages and 2. Concentration on Plymouth and key transport corridors). • Want more clarification of what is included in the urban fringe area. Want to avoid any form of ‘open countryside’ designation on this land which would conflict with the vision of the plan. • For greenspaces within the urban fringe area - any policy proposals should be based on an understanding of the qualities of the areas and an acknowledgement of the enhancements to these areas which could be achieved through appropriate proposals for development. • Any proposals to apply a blunt buffer zone type policy to reflect the ‘setting’ of the AONB would not be justified and would be unsound.</td>
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<td>Wainhomes (South West) Holdings Ltd.</td>
<td>• Concerned that the ‘modest’ levels of growth in the rural areas will not be of sufficient scale to provide for their future vitality and meet housing needs in these areas. • A narrow view of sustainability linked primarily to the availability of services is too simplistic. • While accessibility to jobs/services/facilities is an important element of sustainable development, it is not synonymous with it. A proposal can be sustainable even if it suffers from limitations in terms of its accessibility by walking, cycling or public transport and there are many other components of sustainability such as housing and affordable housing with benefits such as: community cohesion, economic development, local health facilities and access to recreation. • Will allow for development “only in sustainable locations which have reasonable access to services and transport options that avoid reliance on the private car”’ is at odds with the Traylor Review and intentions of NPPF and National Planning Policy Guidance (NPPG). • Need to consider para 29 of the NPPF and look at technology to reduce the need to travel. • There should be a stronger commitment to provide growth in the villages and other smaller settlements. • Relying on Neighbourhood Plans to allocate housing land will create uncertainty. • Want more guidance on the distribution of the requirement to the villages. • Not clear how much development will be apportioned to each settlement – this guidance is necessary to those communities preparing Neighbourhood Plans otherwise there’s uncertainty in respect to how much housing each community will be planning for. • The Plan will need to a mechanism to address any shortfall in supply arising through the failure of Neighbourhood Plans to deliver housing required.</td>
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<td>Woodland Trust</td>
<td>• Pleased to see reference to the statement that – “Land take can lead directly to loss of designated and supporting habitats and fragmentation”. Should relate to all the Development Strategy Alternative Approaches. Particularly relevant to ancient woodland/trees which cannot be replaced. • There should be no further avoidable loss of ancient trees through development pressure,</td>
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| C Brady                    |  • Okehampton has no identity or purpose in common with Plymouth or South Hams.  
• Proposed railway to link Plymouth to Tavistock does not benefit Okehampton and there's no scheme to restore the railway between Okehampton and Plymouth.  
• Commuter and education links are with Exeter and housing is related in the same way.  
• Infrastructure delivery strategies don't help outlying villages.  
• Pressure to move out into the country will fill the road system and reduce the amount of housing for locals. |
| Mr Mark Lawrence           |  • Plymouth should have a greater share of the forecast growth and an option that concentrates more in Plymouth should be used rather than what is proposed.  
• Forecast housing numbers are too high due to: the net migration assumptions used and the allowances made for second homes and "housing market uplift".  
• Should a higher figure be required to cater for the "Plymouth Growth Agenda" then this should be used only in Plymouth and the Plymouth Fringe allocations.  
• A lower total housing figure across the HMA will mean the 5 year land supply will more likely be met and a lower need for housing will mean less required in towns and local centres in South Hams and West Devon. |
| Mr Dudley Luxton           |  • Support. |
| Mr T McCausland            |  • Document is too long, a summary would have been helpful.  
• Abbreviations are not clear. |
| Mr David Pawley            |  • Can't view the 1-17 criteria. |
| Mr Ian Smith               |  • Alternative new link road route south of Ivybridge as in the Ivybridge Neighbourhood Development Plan are not in the consultation.  
• Rejected of the site proposed for housing development on the Western edge of Ivybridge (the Woodlands Road area), has led to a widespread perception that land south of Ivybridge is being actively being considered for housing / mixed use development. |
| Mr John Adrian Wallwork    |  • Support. |
| Miss Tess Wilmot           |  • Concerned that roads in Ivybridge won't be able to cope. Particularly the east ound traffic towards the A38 at Wrangaton. Extension to slip road will be needed. |
| Glen Wise                  |  • Agree with the distribution of development.  
• Brownfield sites should be prioritised over greenfield sites if more homes are needed in Okehampton. |
| Landowner New Barn Farm    |  • Most sustainable option for growth is to concentrate development within or adjacent to the major settlements. This will maximise access to local services, employment and community facilities.  
• Focus should be placed on urban extensions which provide new sustainable, mixed-use neighbourhoods in locations where they will help maintain and enhance local facilities. These will have less impact upon the wider landscape as they're closely associated with existing built development. |
### APPENDIX II: SUMMARY OF SITE SPECIFIC COMMENTS IN THE PLYMOUTH POLICY AREA

**INCLUDING REJECTED SITES AND SITES WHICH WERE NOT CONSULTED ON BUT RECEIVED COMMENTS**

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<thead>
<tr>
<th>Site reference and address</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
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| 0071 Land at St. Levan Gate, Keyham | 2 | - Site falls within the statutory safeguarding consultation zone surrounding HMS Drake. If 100kv powerlines were to be installed the DIO needs to be consulted.  
- This site is 0.65ha and could host a modest sized supermarket, which is not justified over the plan period. |
| 0090 Weston Mill sports pitches and car park | 9 | - Any reduction in sports fields is regressive thinking.  
- Because the land is not being used at the moment doesn’t mean it won’t be in the future.  
- Should all be kept as greenspace.  
- Site falls within the statutory safeguarding consultation zone surrounding HMS Drake. If 100kv powerlines were to be installed the DIO needs to be consulted.  
- Support the proposed used and currently in negotiation with Walker Developments. Satisfied the scheme is viable.  
- Proposed development would enhance sports and community facilities and provide capital to assist in the funding of a replacement burial ground.  
- Site does not show to be at risk of flooding on the Flood Map but the Environment Agency Flood Map for Surface Water indicates flood risks across most of the site. Will need to be considered in any development to ensure it does not cause flood risks elsewhere.  
- This is a former landfill site so ground beneath could be contaminated and soakway solutions could prove difficult.  
- Supportive of the proposed allocation and there’s support from the club and occupier demand has been secured.  
- Allocation can be delivered in the short term to the benefit of residents of the area and will enhance the overall sustainability of western Plymouth.  
- Playing field land needs to be protected as set out in the Plan for Pitches.  
- Any proposal needs to meet the requirements of the NPPF.  
- Concerned over the loss of playing field land at this site.  
- Has new provision been proposed as mitigation if the playing field land is lost?  
- Can the needs of the sport clubs be met at the proposed facilities?  
- Need to think of green infrastructure provision.  
- This site is 0.65ha and could host a very large sized supermarket, which is not justified over the plan period. |
| 0141 Plymouth Fish Market | 1 | - Concerned that the vision put forward by Sutton Harbour in its current form is not compatible with the idea of a growing and prosperous fish market due to the reduction in the operational area of the fish market.  
- Economic benefits the market brings to Plymouth should be recognized and the potential for the market to become a destination attracting footfall and visitor spend.  
- Want to work with Plymouth City Council (PCC) and Sutton Harbour to find a way forward. |
<p>| 0161 Plymouth Railway Station, Intercity House and Land Adjacent | 1 | - Plymouth’s aspirational strategic cycle network may need to be accommodated in any development of this site. |
| 0173 Land at | 1 | - Plymouth’s aspirational strategic cycle network may need to be accommodated in any development of this site. |</p>
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<td>Pennycomequick</td>
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<tr>
<td>0202 Land at Tamerton Foliot Road</td>
<td>2</td>
<td>• Object to development.</td>
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| 0258 Land off Drakelake View | 1             | • Site should be allocated for housing not employment.  
• Adjoining site in Riverford, Estover has been incorrectly designated as strategic green space. |
| 0349 Land to South of Cann House, Tamerton Foliot Road | 5             | • Object to development.  
• Site is unsuitable.  
• Opposed to housing.  
• Site is greenfield with a historic context in a Conservation Area containing habitat and specimen trees and at the lower sides, below the level of the drains. |
| 0379a (SH_04_03_08/13) Land at Woolwell | 1             | • Site is suitable for development.  
• Land at Woolwell represents a coherent and logical extension to Plymouth which is consistent with the growth agenda for the City.  
• Want an enlarged area allocated.  
• Area is demonstrably able to deliver a sustainable neighbourhood.  
• No objection to the local greenspace proposed but wants clarity on how the area will form part of the wider open space/green infrastructure strategy. |
| 0400 (SH_04_04_08/13) Woolwell Extension | 1             | • Site is suitable for development.  
• Land at Woolwell represents a coherent and logical extension to Plymouth which is consistent with the growth agenda for the City.  
• Want an enlarged area allocated.  
• Area is demonstrably able to deliver a sustainable neighbourhood.  
• No objection to the local greenspace proposed but wants clarity on how the area will form part of the wider open space/green infrastructure strategy. |
| 0403 Cann Lodge, Tamerton Foliot | 5             | • Object to development.  
• Site is unsuitable.  
• Opposed to housing.  
• Site is greenfield with a historic context in a Conservation Area containing habitat and specimen trees and at the lower sides, below the level of the drains. |
| 0413 (SH_04_18_16) Field North of Roborough Farm | 2             | • Object to development. |
| 0590c Melville Building, Royal William Yard | 3             | • Drake’s Reservoir should remain green.  
• Reservoir is used as a recreational greenspace regularly every day and a much loved beauty spot.  
• Object to the site becoming a car park, an alternative site for car parking would be Stonehouse Creek which is an eyesore. |
| 0744a Southway Football Hub, Bond Street | 2             | • Support. |
| 0840 Land at Staddiscombe Road/Goosewell Road | 4             | • Pleased the upper part of the site is now being considered to remain as an open space in the form of Sports/Playing Field, but still concerned for housing on the lower part.  
• Will the established pathways and hedgerow boundary be protected?  
• Loss in any part of the site would be felt.  
• Site falls within the statutory safeguarding consultation zone for Wembury Point. Need to consult the DIO at pre-app/application stage for residential/employment. |
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| **0899** Royal Parade and Old Town Street | 1 | • Support.  
• British Land will undertake their own review of the opportunities for development.  
• Support the allocations for mixed use retail-led development.  
• Additional uses for intensified City Centre should include (but not be restricted to) C3, C1 and B1.  
• Allocations should not be limited in any way.  
• Seek clarification on the ‘economic importance’ constraint.  
• Support the aspirations of the City Centre masterplan. |
| **0900** Royal Parade and East of Armada Way | 1 | • Support the allocations for mixed use retail-led development.  
• Additional uses for intensified City Centre should include (but not be restricted to) C3, C1 and B1.  
• Allocations should not be limited in any way.  
• Seek clarification on the ‘economic importance’ constraint.  
• Support the aspirations of the City Centre masterplan. |
| **0909a** Broadreach, Richmond Walk | 3 | • Most of the site is within medium-high risk tidal flood zones. Level of risk is expected to rise due to climate change. The sequential test needs to be satisfied and the exception test passed before any development.  
• Site abuts conservation area and is adjacent a number of listed buildings.  
• Has an appropriate historic environment assessment been undertaken to assess the sites suitability for development?”  
• Need to think of recreational impacts on European protected sites and green infrastructure provision. |
| **0917** Land North of Lake View Close | 3 | • Opposed to housing.  
• Site is greenfield with a historic context in a Conservation Area containing habitat and specimen trees and at the lower sides, below the level of the drains.  
• The Plan shows the site is previously developed which is incorrect.  
• Opposition to a housing development is reconfirmed. |
| **0942** Land at Stuart Road/Victoria Park | 1 | • Site should be considered for housing and employment. |
| **0949** Brickfields Recreation Ground | 1 | • Agree with the allocation.  
• To deliver additional facilities, enabling development will be critical to the success of any new scheme.  
• Recognise the need to reinvest any housing development in the built infrastructure associated with the rugby club and the need for sustainability to ensure viability.  
• If the rugby club can’t regenerate then alternative options of relocating the club will need to be considered.  
• Need an element of flexibility in respect of infrastructure requirements.  
• A redeveloped sports stadium would help deliver the principles of the City Centre and Waterfront area vision. |
| **0956** Open Space at Plympton House | 3 | • Strongly object to the development of land, should remain as pasture/greenspace.  
• Would result in considerable traffic increase.  
• With Sherford and other developments there’s no shortage of housing.  
• Would require additional access which is not appropriate.  
• In previous appeal decision inspector stated he thought the land was protected as green open space.  
• Coniferous and deciduous trees on and adjoining the Plympton House premises are a feature of the area and should be protected and controlled.  
• Development must be compatible with the character of the house and grounds as |
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| 0960 (SH_49_18_16, SH_49_19_16, SH_49_20_16) Langage extensions                         | 2               | • Proposed greenspace from Holland Road includes an area to be developed as part of Langage Business Park phase 1 and 2. Greenspace needs to be realigned to follow the footpath.  
• Part of the proposed greenspace (adjacent to Langage Business Park) should be employment land. |
| 0971 MDEC Central Park Avenue                                                            | 1               | • Plymouth’s aspirational strategic cycle network may need to be accommodated in any development of this site.                                                                                                  |
| 0974 Royal Assurance site, Armada Way                                                     | 1               | • British Land will undertake their own review of the opportunities for development.  
• Support the allocations for mixed use retail-led development.  
• Additional uses for intensified City Centre should include (but not be restricted to) C3, C1 and B1.  
• Allocations should not be limited in any way.  
• Seek clarification on the ‘economic importance’ constraint.  
• Support the aspirations of the City Centre masterplan.                                  |
| 0976 Bull Point Barracks, Foulston Avenue                                                 | 4               | • Site falls within the statutory explosive safeguarding consultation zone for Ernesettle and Bullpoint and falls within the statutory vulnerable building distance zone. Will need to consult the DIO to ensure any proposed structures are non-vulnerable.  
• Any development of this site should be conservation led and existing historic environment should be enhanced by any proposal.  
• Development should include improved public access.  
• Site includes a number of grade II listed buildings and scheduled monument.  
• Unsure whether an appropriate historic environment assessment has been undertaken.  
• Need to think of recreational impacts on European protected sites and the provision and linking of green infrastructure. |
| 0981 Elburton (Land at Candish Drive)                                                     | 1               | • Site is perfectly placed to help achieve the emerged preferred option for development distribution in the topic paper.                                                                                       |
| 0985 (SH_04_14_14) Land West of Broadley Park Road                                       | 2               | • Object to development.                                                                                                                                                                                     |
| 0992 Land at Mowhay Road/Coombe Farm, Kings Tamerton                                      | 23 (including a petition with 43 signatures against development) | • Object to the site becoming a gypsy and traveller site.  
• Object strongly to housing.  
• There are more suitable sites.  
• Don’t think the site should be developed.  
• No objection to housing but would object the site for gypsy/traveller site.  
• Worried about the fall in property prices.  
• Site contains a fire-damaged farmhouse which should be redeveloped for private or community use.  
• Could it be restored/used as a rendezvous for local wild-life activities?  
• Area is part of an important green corridor and rural aspect would be compromised with new housing. |
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<td>• Area is important natural space for wildlife and contains various sensitive species.</td>
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<td>• Would fragment green corridors and thus against Plymouth policy.</td>
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<td>• Ancient hedgerows and well documents flooding and sewerage issues at Weston Mill, development would make this worse.</td>
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<td>• Site would take substantial groundworks to build which may affect neighbouring properties.</td>
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<td>• On the intersection of two major roads, access would be a problem.</td>
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<td>• While transport constraints have been identified, amenity should also be considered due to noise and air quality impacts.</td>
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<td>• If the Transport Strategy identified the need for highway improvements in the vicinity of A38, some of the land may be needed to provide necessary infrastructure.</td>
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<td>• Roads will need major work to accommodate housing.</td>
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<td>• Environment Agency Flood Map for Surface Water shows more of the land to be at risk of flooding than the Flood Map. The sequential test will need to be satisfied prior to development but it is possible that the at risk areas could be avoided.</td>
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<td>• Part of site is former landfill site. Potential contamination and potential soakaway solution difficulties.</td>
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<td>• Concerns about it being too isolated from services if it’s a gypsy and traveller site.</td>
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<td>• Would need improved access to the A38 which is currently busier due to energy from waste plant.</td>
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<td>• Topography is challenging and could affect the soundness of existing properties.</td>
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<td>• Concerned that no sites have now been identified for gypsy and traveller use – will this be a weakness in the Plan when it reaches its public enquiry?</td>
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<td>• The current proposal for housing (with open space improvements) is too vague, greenspace and housing should be defined before proposal is acceptable.</td>
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<td>• Hoped that Kings Tamerton Woodland will be designated as a nature reserve in the future.</td>
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<td>• Undesignated area around site 0264 and part of this site should be designated greenspace to allow a green corridor between Kings Tamerton Woodland and Ham Woods.</td>
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<td>• The site to be designated as greenspace should be near the top of the hill, adjacent to the current housing on Kings Tamerton Road and Coombe Way. The corridor should be of a substantial width and should facilitate public access between the nature reserves as well as facilitating wildlife movement.</td>
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<td>• Need to confirm access to the site. Coombe Way is not suitable.</td>
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<td>• Want the space retained as woodland/nature reserve.</td>
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<td>• Cities are equally recognised as maintaining habitats and biodiversity.</td>
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<td>• Site is an important green corridor from Ham Woods to King’s Tamerton with wildlife and important habitats through to Ernesettle.</td>
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<td>• Area is prone to flooding and sewerage spillage would be worsened.</td>
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<td>• Area has no amenities such as shops, doctors or schools.</td>
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<td>• Where would the new traffic go? How many houses? How will this affect flooding?</td>
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<td>• Plan doesn’t adhere to the green corridors strategy which maintains biodiversity in Ham Woods.</td>
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<td>• Would have a negative impact on the local environment and threaten flora and fauna.</td>
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<td>• Kings Tamerton does not have the facilities or infrastructure to cope with additional housing.</td>
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<td>• Lack of services i.e. only one small shop, no doctors surgery, dentist etc.</td>
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<td>• Poor public transport and access.</td>
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<td>• Important wildlife zone providing an important corridor and valuable greenspace.</td>
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<td>• Drainage is also an issue.</td>
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| 0996 Land at Outland Road Depot | 6 | • Need to think of recreational impacts on European protected sites and the provision and linking of GI.  
• Strongly object to this site being designated for housing.  
• Site should be managed as greenspace and incorporated into either Kings Tamerton Woods or Ham Woods, or both.  
• Needs a proper management plan and input from the local communities.  
• Object to the previous proposal for a gypsy and travellers site due to having children and parking their cars in the street.  
• The infrastructure needs to be extended before any residential development were to take place.  
• How has the Sustainability Appraisal process validated the inclusion of site as housing?  
• Site is not suitable due to the multiple ownership of land and the amount of development constraints.  
• Land opposite is designated as greenspace but there appears to be no discernible different between this piece of land and that. |
| 1010 Island Farmhouse, Plymbridge Road | 2 | • Site is a former landfill site with potential contamination and soakaway solution difficulties.  
• A garden centre would dilute the health and wellbeing opportunities that further/improved sporting facilities could deliver.  
• Development on this site has the potential to benefit Central Park and the immediate area, not by becoming a garden centre but: by improving access (north-south route between Coronation Avenue and Venn Lane and a direct access between Outland Road and the Cricket Field); improved landscape cohesion (similar treatment to the CP05 proposal for the corner between Peverell Park Road and Outland Road) and financial contributions (by expecting freehold receipts to contribute to the park’s restoration and rejuvenation).  
• Selling the land for less than development value would reduce immediate benefits.  
• Central Park needs a maintenance compound.  
• Disagree with the constraints.  
• Would increase traffic.  
• Site should be developed for uses ancillary to the sporting and leisure focus of the Park.  
• Development of the land to support community activities will provide an opportunity to work alongside community groups and provide an improved local infrastructure.  
• Site should be protected for future sporting use in line with para 14 of policy CP04 in the Central Park Area Action Plan.  
• Support if access remains for the Goals Soccer Centre and Peverell Park, Central Park. |
| 1014 Land between 140 & 150 Dunraven Drive | 8 | • Why has the farmhouse had extensions if it's going to be demolished?  
• Need to think of recreational impacts on European protected sites and the provision.  
• No objection subject to access path being developed.  
• Additional lighting and handrails at suitable locations would aid the elderly.  
• Ideal proposal as long as the site is for housing and footpath only.  
• Site is currently an eye-sore.  
• Don’t object to housing infill but would object if a lot of houses were to be built.  
• Object, it could become a precursor to the development of Southway Valley Nature Reserve.  
• Worried about it being developed at a high density.  
• Recently cleared trees causes concern for residents. |
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| **1015**<br>Milfields Trust, 278 Union Street, Stonehouse | 2 |  • No objection to development.  
  • Redevelopment would provide opportunity to make improvement to sewer system and help reduce food risk and water quality.  
  • Need to think of recreational impacts on European protected sites. |
| **1016**<br>Boringdon Park, Plymbridge | 8 |  • Support, but need to consider how traffic will access. Concerned about increasing the volume of traffic into Plympton along Plymouth Road, Larkham Lane and the St Mary’s Bridge area.  
  • Want sufficient onsite parking for visitors  
  • Regard should be had to the setting of heritage assets and a systematic process of assessment should be undertaken in line with Historic England guidance on the setting of heritage assets, including The Historic Environment and Site Allocations in Local Plans.  
  • National Trust would welcome discussions over the planned cycle facilities in relation to its ownership of Plymbridge Woods and the associated cycle trails.  
  • Would support Borrington Park being designated as Strategic Greenspace.  
  • Support the site to accommodate playing pitches and other recreational uses but this will not be possible unless some residential development is allowed to help pay.  
  • Recognising the site is suitable for playing pitches indicates that an urbanising effect on the land is acceptable - meaning it’s not a particularly sensitive landscape which is correlated with the lack of designation.  
  • Reasons for rejection can be addressed and dismissing the site as unsuitable is unsound.  
  • Redevelopment of adjacent minerals working and industrial land would be costly and therefore site should expand to include greenfield land.  
  • Redevelopment focused solely on the former china clay works is unlikely to deliver policy compliant levels of affordable housing.  
  • Proposal is adjacent to Scheduled Ancient Monument and Listed Buildings and any development should seek to conserve and enhance the setting.  
  • Opportunities should be taken to enhance access understanding and enjoyment.  
  • Unsure of whether an appropriate historic environment assessment has been undertaken.  
  • Development, including landscaping, lighting and recreational structures may have a negative impact on the setting adjacent designated heritage assets.  
  • May be positive opportunities to enhance the setting of these monuments and also to recreate former parkland on the west side of Plymbridge Road and to improve access to and interpretation of the heritage assets. |
| **1030**<br>Sugar House, Sutton Harbour | 3 |  • Previous comments on Sutton Harbour sites 0141, 0344 and 0967 apply to this site.  
  • Need to think of recreational impacts on European protected sites.  
  • There may be scope to explore a small convenience foodstore within this site. |
| **1036**<br>Land SW of Belliver Way | 2 |  • Playing field land needs to be protected as set out in the Plan for Pitches and meet the requirements of the NPPF.  
  • Need to think of recreational impacts on European protected sites. |
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| Stonehouse Barracks       | 10              | • Site falls within the statutory explosive safeguarding consultation zone surrounding Plymouth Sound. DIO will need to be consulted on to ensure proposed structures are non-vulnerable.  
• Redevelopment could provide opportunity to improve current sewer system and implement a drainage route that impacts development outside this area and improve water quality and reduce flood risk.  
• It would be beneficial for the city if the sand AGP could be refurbished and brought back into the supply chain as part of the overall development of the site.  
• Concerned that such designation does not cause conflict between residential, operational Port, and ferry uses nor restrict or prevent future use and growth of the Port or its tenants operations.  
• Re-development should have regard to the Associated British Ports ongoing use of the neighbouring site.  
• Concerned about increase in traffic movement, particularly surrounding Millbay Road roundabout and the new developments there.  
• Need to review traffic control measures.  
• Proposed pedestrian/cycle route through the ferry port and site to Pound Street will increase the quality of the journey to the Red House.  
• Continuing the proposed waterfront link with the Southwest Coast Path at Eastern King Point would allow access to areas which is currently inaccessible.  
• Want increased access to sea and outdoor spaces and use of the sports grounds within site for learners and local community.  
• Playing field land needs to be protected as set out in the Plan for Pitches and meet the requirements of the NPPF.  
• Concerned that such designation does not cause conflict between residential, operational Port, and ferry uses nor restrict or prevent future use and growth of the Port or its tenants operations.  
• Site includes a number of highly graded historic assets and is within a conservation area.  
• Welcome the potential reuse of this site but are unsure of whether an appropriate historic environment assessment has been undertaken.  
• Will need an appropriate evidence base.  
• Need to think of recreational impacts on European protected sites.  
• There may be scope to explore a small convenience foodstore within this site. |
| Peverell Park cricket pitch | 5               | • Any reduction in sports fields is regressive thinking.  
• Even if the land is not being used at the moment it doesn't mean it won't be in the future.  
• Should be kept as greenspace.  
• Youth Football could be provided on the cricket outfield and help to provide an income stream at the site to aid sustainability.  
• Support the proposal for a Cricket Pitch |
| Higher Efford Pitches      | 3               | • Proposed establishing a walking and cycling route from Marsh Mills to Efford Cemetery which would require the Efford Pathway via the tunnel at Crabtree to be upgraded and widened and the current path from Military Lane to Efford Cemetery to be better maintained. This would give (mainly off-road) access by bike to the proposed sports. Would reduce parking demand and be a healthier mode of travel. |
| Radford Quarry, Plymstock  | 1               | • Welcome the rejection.  
• The site is a County Wildlife Site with rare biodiversity and important habitats.  
• Recommend resources are allocated to ensure it is managed to conserve/enhance the biodiversity interest and allow public access that does not damage the nature |
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| 0404 Land south of Coombe Lane, Southway | 2 | - Strongly object to the development of the site.  
- Preservation of greenspace is good for the mental wellbeing of Plymouth residents.  
- Convenient space, avoids the need for car travel to other areas which adds to pollution.  
- Access roads are not able to accommodate increased traffic due to the width restrictions. |
| 0405 Land at West Trehills, Tamerton Foliot | 2 | - Strongly object to the development of the site.  
- Preservation of greenspace is good for the mental wellbeing of Plymouth residents.  
- Convenient space, avoids the need for car travel to other areas which adds to pollution.  
- Access roads are not able to accommodate increased traffic due to the width restrictions. |
| 0412 Tamerton Road, Belliver | 3 | - Why has the site been rejected when other sites closer to the AONB have not?  
- Due to farm buildings to the west on Roborough farm, some form of economic or residential development could take place - ideally self-build.  
- Welcome rejection as a means of furthering a 'green' link and non-main road access from Coombe Valley to Dartmoor National Park.  
- Potential to link into the triangle behind Green Café and to provide an exit from the West fork of Coombe Valley as part of the increased development proposed at Bradley/ Roborough. |
| 0416 (SH_04_11-08/13) West Trehills Farmhouse, Allern Lane, Tamerton Foliot | 4 | - Strongly object to the development of the site.  
- Preservation of greenspace is good for the mental wellbeing of Plymouth residents.  
- Convenient space, avoids the need for car travel to other areas which adds to pollution.  
- Access roads are not able to accommodate increased traffic due to the width restrictions.  
- Site should not be excluded /rejected.  
- Represents a suitable site that is capable of delivering houses within the current 5 year period. |
| 0419 Old Newnham Farm, Plympton | 1 | - Object to rejection of site.  
- The construction of the Hemerdon Mine road has not been properly factored in to previous discussion about heritage or landscape impact.  
- The road provides a clear visual and physical separation of the site.  
- It's intended that the important and visually sensitive part of the site be offered as a new extension to the current strategic open space of PCC, this isn’t mentioned in the assessment or for the reasons for rejection. |
| 0587a Plymouth Airport | 2 | - Has anyone considered solar panels on the airport site?  
- Object to rejection of the site.  
- Airport site is an appropriate location for jobs, homes and high quality public spaces, as well as first class community, sports, leisure and education facilities in the north of the city.  
- Airport is not considered to have any redevelopment potential as an airport.  
- PCC continue to safeguard and have ignored advice and evidence reports.  
- Plymouth is having to look elsewhere at ‘greenfield’ sites for development which is contrary to the NPPF.  
- Site hasn’t been considered and not given proper assessment due to the safeguarding. |
| 0730a Land off Plymbridge Road, Woodford | 1 | - Unsure why the assessment/rejection reasons have changed.  
- Greenfield nature of the site should not be a barrier to development when it can contribute significantly to housing needs.  
- Development of the site for a reduced number of dwellings compared with the |
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| previous would not have an unacceptable impact on the setting of Plympton.  
• No justification for including the site within the proposed Strategic Green Space and strongly object to its inclusion. | 1 | |
| 0740c Plymstock Quarry Central | 1 |  
• Object to rejection of site.  
• Current discussions are not reflected in the assessment.  
• The process of considering changes to the master plan has already been commenced with senior planning officers of the council and therefore the reasons for rejection are perverse. |
| 0740d Plymstock Quarry East | 1 |  
• Object to rejection of site.  
• Current discussions are not reflected in the assessment.  
• The process of considering changes to the master plan has already been commenced with senior planning officers of the council and therefore the reasons for rejection are perverse. |
| 0793a Seaton Neighbourhood West, Derriford | 1 |  
• Object to rejection of site.  
• Don’t understand reason for rejection, if further information is required happy to engage with officers to discuss.  
• Not a valid reason for refusal. |
| 0793b Seaton Neighbourhood East, Derriford | 1 |  
• Object to rejection of site.  
• Don’t understand reason for rejection, if further information is required happy to engage with officers to discuss.  
• Not a valid reason for refusal. |
| 1002 Land at 60 Vinery Lane, Elburton | 1 |  
• Don’t agree with reasons for rejection.  
• EA have raised no objection on flood risk grounds.  
• Improvements at Sherford has increased the size of the culvert to deal with known flood issues.  
• Approach here is identical to Broadreac, Richmond Walk (0909a) which is proposed for residential.  
• Housing is already allocated around and it would be logical to complete the transition of this part of Elburton.  
• A suitable location with ready access to facilities that Sherford will provide.  
• Recent permissions and allocation suggest it is a sustainable location. |
| 1017 Land off Horsham Lane, Tamerton Foliot | 2 |  
• Strongly object to the development of the site.  
• Preservation of greenspace is good for the mental wellbeing of Plymouth residents.  
• Convenient space avoids the need for car travel which adds to pollution.  
• Access roads are not able to accommodate much increased traffic due to the width restrictions. |
| 1021 Land north of Coombe Lane, Southway | 2 |  
• Strongly object to the development of the site.  
• Preservation of greenspace is good for the mental wellbeing of Plymouth residents.  
• Convenient space avoids the need for car travel which adds to pollution.  
• Access roads are not able to accommodate much increased traffic due to the width restrictions. |
| 1033 Land adj to 54 Blunts Lane, Estover | 1 |  
• Strongly object to the land included as part of the community park.  
• Strongly object to footpaths which have been indicated.  
• Any rights of way would need to be separately negotiated and would be resisted.  
• Want to build a single dwelling on the land which will be an area significantly reduced from the original area.  
• Would argue the impact of a single dwelling on the natural environment. |
| 1035 Whiston Farm, Whitson Cross Lane, Tamerton | 2 |  
• Strongly object to the development of the site.  
• Preservation of greenspace is good for the mental wellbeing of Plymouth residents.  
• Convenient space avoids the need for car travel which adds to pollution. |
### Site reference and address

<table>
<thead>
<tr>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foliot</td>
<td>• Access roads are not able to accommodate much increased traffic due to the width restrictions.</td>
</tr>
</tbody>
</table>
| Land at Haye Road | 2 | • Disagree with the decision to reject due to being 'an unsuitable location for housing'.  
• Site was deemed suitable in the previous land allocations assessment by PCC without any input from land owner so now wondering why this has changed.  
• Land would provide valuable links to Sherford and Plymstock Quarry in the form of transport links and housing.  
• Area is well catered for in terms of food retail but the policy should express that local needs retail within an active frontage would be acceptable. |

### APPENDIX III: SUMMARY OF SITE SPECIFIC COMMENTS IN THE THRIVING TOWNS AND VILLAGES POLICY AREA

**INCLUDING REJECTED SITES AND SITES WHICH WERE NOT CONSULTED ON BUT RECEIVED COMMENTS**

<table>
<thead>
<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
</table>
| SH_07_09_14/16 Land to the east of Winstone Lane, Brixton | 7 | • This site is not suitable for development because it is within the South Devon AONB, which is a significant constraint that is not outweighed by any other consideration.  
• As well as being within the AONB, this is a greenfield site and is outside the Brixton Village Development Boundary. Alternative sites for small scale development outside of the AONB have fewer constraints.  
• The village does not have the infrastructure to cope with additional housing.  
• Sherford will provide homes for an additional 12,000 residents – why is more housing needed in Brixton? |
| SH_07_10_14/16 Land to the south of The Crescent, Brixton | 7 | • This site is not suitable for development because it is within the South Devon AONB, which is a significant constraint that is not outweighed by any other consideration.  
• As well as being within the AONB, this is a greenfield site and is outside the Brixton Village Development Boundary. Alternative sites for small scale development outside of the AONB have fewer constraints.  
• The village does not have the infrastructure to cope with additional housing.  
• Sherford will provide homes for an additional 12,000 residents – why is more housing needed in Brixton? |
| SH_14_03_08/13/16 Woodlands Yard, Dartington | 5 | • The site is not suitable for employment due to access, amenity and landscape constraints. The existing use of the site for education purposes is appropriate.  
• Appropriate-scale business will complement the existing activity on this site and the site is currently available for development.  
• The Neighbourhood Plan supports DHT in its proposals for further small scale employment and craft buildings on the site provided development is single storey in height and access and amenity constraints identified by the JLP are addressed.  
• The proposal includes part of the Scheduled Dartington deerpark pale. This designated heritage asset should be excluded from the development area. Also, a Romano-British farmstead has been found in nearby North Wood. The area therefore has potential for further related archaeological discoveries. A programme of archaeological assessment and mitigation should be required.  
• Development of this site would require improvements to pedestrian and cycle access. |
| SH_14_30_16 Beacon Park, Dartington | 4 | • This site should be allocated for development as it is lightly constrained and would contribute to the shortfall in allocated employment land in Totnes.  
• The Neighbourhood Plan Group considers this site suitable for employment use but not residential or mixed use development given its distance from the village. |
<table>
<thead>
<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
</table>
| SH_57/27_13_13 Land to the south of A38, off Godwell Lane, Ivybridge | 1 | • This site has potential for cirl buntings to be present on any suitable habitat; the Council should follow the RSPB recommendations re site survey for cirl buntings and then mitigation/compensation as appropriate to ensure there is no net loss of habitat used by cirl buntings.  
• The potential to cater for pedestrians and cyclists along the A38S is limited in places. Development of this site would also require improvements to bus services. |
| SH_57_16_14/16 Filham Moor, Ivybridge | 1 | • This site should be considered for development in conjunction with adjacent sites south of the A38 and together they offer a reasonable alternative to other options for growth in Ivybridge. |
| SH_57_17_14/16 Filham Moor and Yeo Corner, Ivybridge | 1 | • This site should be considered for development in conjunction with adjacent sites south of the A38 and together they offer a reasonable alternative to other options for growth in Ivybridge. |
| SH_28_01_13 Land off Treblepark Road, K1, Kingsbridge | 1 | • This site is within 250m of one cirl bunting breeding territory. |
| SH_28_02_08/13 Land at Coombe Lane, Kingsbridge | 1 | • This site is steeply sloping with poor vehicular access and should be rejected for development.  
• This site is within the SSSI Impact Risk Zones. |
| SH_28_03_08/16 Dodd Meadow, Kingsbridge | 1 | • This site is within the SSSI Impact Risk Zones. |
| SH_28_07/08/13 Belle Hill, Land to North of Buckwell Close, Kingsbridge | 1 | • This site is not suitable for development as there are landscape, infrastructure, access, sustainability and flooding constraints.  
• Part of this site falls within the SSSI Impact Risk Zones.  
• Development of this site will impact on the AONB and its setting.  
• The site's pedestrian route into Kingsbridge will make pedestrian access unsafe for residents in the area, due to the fact that many more people will have to walk in the road, given the narrow pavements in the area. |
| SH_28_31_14 Dennings, Wallingford Road, Kingsbridge | 1 | • This site is within the SSSI Impact Risk Zones.  
• This site is steeply sloping with no direct access to a public road and should be rejected for development. |
| SH_49_18_16 Land south east of Lee Mill Bridge, Lee Mill | 3 | • Any development in the Ivybridge/Lee Mill area should be kept north of the A38 or development will be separated by the A38 and will encroach into a river valley.  
• What are the economic drivers for growth in the South Hams that would support the need for further development?  
• Highways England consider that infrastructure could be considered a constraint, depending on the type and scale of employment development proposed.  
• It may be difficult to achieve pedestrian and cycle facilities to serve any development on this site due to land ownership. |
<p>| WD_06_13_16 Land to the north of the A3072, Hatherleigh | 1 | • This site is supported as an allocation for mixed use development; constraints are recognised but can but be addressed through masterplanning. |
| WD_08_13_16 | 13 | • Site is not suitable for housing given landscape, heritage, environmental, flooding. |</p>
<table>
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<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
</table>
| Great Rookery Orchard, Exbourne |  | Infrastructure, and access and traffic constraints.  
  • Development would have potential recreational impacts on European protected sites.  
  • The site is designated as Important Open Space.  
  • The boundary of the site is incorrect, as the site does not extend to Duck Lane, as the garden of Church Cottage extends from the garage along Duck Lane and along the boundary with Rookery Orchard.  
  • Has an Historical Impact Assessment been undertaken for this site?  
  • Allocation should be removed from the plan. It is within the setting of the Grade II* Listed parish church and has potential for archaeological evidence for medieval settlement.  
  • Should be assessed for its setting impact and archaeological potential prior to inclusion in the plan.  
  • Development appears to be fine in principle with access from the west, but some significant trees along the frontage may be compromised by the formation of an access and suitable sight lines.  
  • Access to Duck Lane should be for pedestrians only. |
| WD_15/23_03_13/16 Land to the west of Fatherford Lodge, Okehampton | 1 | • The SHLAA pack states that whole of the site is unsuitable for development, but then goes on to say that it would be suitable as a windfall site for 50 houses. This needs to be clarified and should be removed from any further development discussions until at least after 2034. |
| WD_15_45_16 Old Mill, Okehampton | 1 | • The site includes the whole of the car park, if this were all developed it could accommodate more than the 10 houses proposed. Should the boundary be amended? |
| WD_21_09_16 Land to east of Bratton Clovelly | 10 | • This site is unsuitable for development due to heritage constraints, flooding, poor access, topography and the presence of high tension power lines running across the site.  
  • Development of this site would have potential recreational impacts on European protected sites.  
  • Attempts have been made to quantify the need for affordable housing in Bratton Clovelly but this work has not proven conclusive. However, local need should be prioritised on any future development in the Parish. Wider need should only be accommodated if appropriate investment is made to support the extra housing.  
  • Council tax payers of West Devon should have been able to decide if a JLP was a suitable route to plan for West Devon. Bratton Clovelly has minimal links with Plymouth and has far more links with Exeter.  
  • Has an Historical Impact Assessment been undertaken for this site? This site lies close to the historic medieval core of the village. There is some archaeological potential for early settlement evidence. A programme of archaeological assessment and mitigation should be required.  
  • This site is suitable and available for development; the site can be developed within 5 years. Identified constraints to development on the site can be addressed.  
  • Achieving satisfactory vehicle access to serve this site would be challenging. |
<p>| WD_35_13_13/16 Land at North Road, Lifton | 1 | • This site should be considered suitable for development; submissions have been made to accompany 2323/16/OPA for the site and technical consultation responses have been positive. |
| WD_45_01_08/13 Land at New Launceston Road, Tavistock | 1 | • Allocation of this site cannot be justified by the evidence base or considered the most appropriate strategy when considered against reasonable alternatives. |
| WD_45_03_08 Land at Neathern Brook, Tavistock | 1 | • This site (plus additional land) is suitable for residential development; constraints on site are acknowledged but can be addressed through masterplanning. |</p>
<table>
<thead>
<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>WD_45_14_08/13 Land off Callington Road (Site B), Tavistock</td>
<td>1</td>
<td>• This site is a logical and sustainable extension of Tavistock and should be allocated for development. It could be delivered as part of a comprehensive development with SP23a.</td>
</tr>
</tbody>
</table>
| WD_45_78_16 Mount Kelly Prep School, Tavistock | 3 | • Sport England is concerned with the proposed housing allocation of the (ref: WD_45_78_16) Mount Kelly Prep School for 100/120 houses. The existing facilities including playing fields need to be replaced (if lost to housing) in line with para 74 of the NPPF and Sport England policy.  
• Work undertaken to date to prepare an outline planning application for this site has not identified any constraints that cannot be addressed. The site is available and suitable for residential development.  
• Allocation of this site cannot be justified by the evidence base or considered the most appropriate strategy when considered against reasonable alternatives. |
| WD_49_06_08/13 Land at Abbey Meadows, Crapstone | 1 | • This site should be selected for development; it was assessed as suitable in the SHLAA and received community support at a recent open day organised by the Neighbourhood Planning Team. |
| Dartington | 1 | • SH_14_26_16 is within 2km of cirl bunting breeding territories. RSPB has ad hoc records of cirl buntings within 250m of above site (from February 2013) and within 250m of some of the allocations at Dartington (RA3 and SH_14_04_13), indicating that cirl buntings have recolonised the area since the 2009 survey. |
| T5 Dartington/Totnes | 1 | • This site should be included as part of the unbuilt eastern part of T6. It is currently being progressed for delivery as a community-responsive custom / self-build residential development. |
| SP22A Parcel 4 Okehampton | 1 | • This does not appear in the JLP; as this area has already been given planning consent, will the site now fall under the Windfall category should it ever go ahead? It also needs to be noted that during this planning process, DCC Highways stated that the slip road onto the A30 to the east of the town will need to be upgraded before any further development takes place in the Town or Hamlets. How will this affect the overall strategic plan if this deters any future development of the employment land? |
| SP23a, Land at Callington Road, Tavistock | 1 | • Allocation of this site is supported. |
| SP23B, Land at Plymouth Road, Tavistock | 1 | • The area available for development has been increased (to the south) since the consultation during July and August 2016 and the allocation footprint should be increased accordingly. |
| T1 Totnes | 1 | • There is a cirl bunting record (June 2014) within T1. |

**Rejected Sites**

<table>
<thead>
<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
</table>
| SH_05_09_14/16 Land at Holwell Farm, St. Ann’s Chapel, Bigbury | 3 | • Further explanation of reasons for rejection is necessary.  
• Current assessment of community facilities is disputed by the agent for this site.  
• Fully supportive of the rejection of the site.  
• Kingston Parish Council is broadly supportive of the approach to allocating development in the JLP, particularly that villages such as Kingston “can support an appropriate and proportionate level of growth over the Plan period. It is anticipated that development in these locations will come forward through strategic allocations within the JLP where appropriate, and through Neighbourhood Plans.” Rejection of the site in Bigbury is supported and the reasoning applies equally to Kingston. |
| SH_27_02_13/16 Land at Stibb Farm, Ivybridge | 2 | • Rejection of SH_27_02_13/16 for the reasons given is supported but also due to the topography of the land and the major issues with drainage/water run-off from Dartmoor in that vicinity.  
• This site should be selected for development; access can be secured through a...
<table>
<thead>
<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SH_49_17_16</strong> (part) Lee Mill</td>
<td>1</td>
<td>• This land is available for development of 190 houses; there are no known constraints to prevent development and building could commence within two years.</td>
</tr>
<tr>
<td><strong>WD_34_04_16</strong> Land west of Station Road, Meeth</td>
<td>1</td>
<td>• The rejection of this site is challenged; landscape constraints can be addressed through careful design and Meeth is a sustainable location for development. Development of a mix of tenures will also contribute to addressing Meeth’s housing need, particularly in terms of the need for affordable housing.</td>
</tr>
<tr>
<td><strong>SH_50_12_16</strong> Site behind Wolston Chapel and Live and Let Live Inn, Landscombe</td>
<td>1</td>
<td>• This site should be reconsidered as suitable for development; constraints could be overcome by sympathetic design and careful consideration given to the density of development and the proportion of affordable housing for local people. Community facilities, such as a village shop, could be offered as part of any development in order to increase the sustainability of the village and provide a much needed service for those unable to travel to larger town centres.</td>
</tr>
<tr>
<td><strong>SH_50_13_16</strong> Site behind The Bungalow, Memory Cross, Landscombe</td>
<td>1</td>
<td>• This site should be reconsidered as suitable for development; constraints could be overcome by sympathetic design and careful consideration given to the density of development and the proportion of affordable housing for local people. Community facilities, such as a village shop, could be offered as part of any development in order to increase the sustainability of the village and provide a much needed service for those unable to travel to larger town centres.</td>
</tr>
<tr>
<td><strong>SH_52_10_16</strong> Land at Paignton Road, Stoke Gabriel</td>
<td>1</td>
<td>• Rejection of this site is supported; there are landscape and infrastructure constraints to any development in this area. Any proposals should come forward via the Neighbourhood Plan.</td>
</tr>
<tr>
<td><strong>Other</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dartmouth</td>
<td>1</td>
<td>• All proposed allocated sites are within 2km of cirl bunting breeding territories.</td>
</tr>
<tr>
<td>Dittisham</td>
<td>1</td>
<td>• The area in Dittisham encompassed by “The Ham”, “Shinners Meadow” and the intervening space should be designated as Local Green Space.</td>
</tr>
</tbody>
</table>
| Ivybridge | 1 | • Proposals for Ivybridge should be reviewed in light of Ivybridge Neighbourhood Plan Groups’ aspirations for regeneration of the town centre.  
• Sites to the east and west of Ivybridge should be rejected, as they would exacerbate existing traffic and air quality issues in the town  
• Sites south of the A38 should be developed as part of a comprehensive mixed use development. |
| Kingsbridge | 1 | • All proposed allocated sites are within 2km of cirl bunting breeding territories. |
| Modbury | 5 | • The document does not show the location of alternative sites for Modbury; the community wanted a dispersed development pattern on smaller sites rather than a large extension to the town.  
• Modbury Neighbourhood Plan Group, with the support of the local Ward Member, have put forward a number of smaller sites that would accommodate the total housing numbers for Modbury in a way that would be more acceptable to the local community.  
• There is an ad hoc record of cirl bunting c750m to NE of Modbury. So, whilst all allocations at Modbury are more than 2km outside 2009 breeding range, potential for cirl bunting presence should be considered. |
| Okehampton | 2 | • Alternative strategic options for Okehampton’s future are provided by Cllr Rush, these include infrastructure and transport planning concepts.  
• Any development in Okehampton and Okehampton Hamlets should be on brownfield sites before any further greenfield sites are taken up.  
• Principles in the Core Strategy should be carried forward into the JLP, such as the Masterplan for the east of Okehampton, Design for Living Standards and the Okehampton town centre relief road. |
<table>
<thead>
<tr>
<th>Settlement or Site reference</th>
<th>No. of Comments</th>
<th>Comment Summary</th>
</tr>
</thead>
</table>
| Okehampton                  |                | • Okehampton has an issue with parked vehicles and the JLP should contain policies to address this.  
                               |                | • There should be no further development to the east of Okehampton, as this would ruin the views of Dartmoor for the town. |
| Salcombe                    | 1              | • All sites are within 2km of cirl bunting breeding territories.  
                               |                | • RA3 is within 250m of 2 cirl bunting breeding territories.  
                               |                | • RA4 is within 250m of 2 cirl bunting breeding territories.  
                               |                | • SH_41_07_16 is within 250m of 1 cirl bunting breeding territory. |
| Stokenham/Chilington        | 1              | • All sites are within 2km of cirl bunting breeding territories. |
| Tavistock                   | 1              | • Employment sites should be developed in Tavistock to reduce the strain on the transport infrastructure. |
| Woolwell                    | 1              | • A number of sites have been proposed by the Neighbourhood Plan Group for designation as Local Green Space, these include;  
                               |                | o Roborough Green  
                               |                | o Cann Wood View  
                               |                | o Riverford Close  
                               |                | o Play park  
                               |                | o Church Park Road  
                               |                | o Bickleigh Village Green |

**APPENDIX IV: SUMMARY OF COMMENTS ON PROPOSED NEW LOCAL GREEN SPACE SITES**

<table>
<thead>
<tr>
<th>Site reference and address</th>
<th>No. of Comments</th>
<th>Key issues raised in engagement</th>
</tr>
</thead>
<tbody>
<tr>
<td>LGS - Plympton</td>
<td>1</td>
<td>• Support.</td>
</tr>
</tbody>
</table>
| LGS - Sparkwell            | 2              | • Client owns land north of the railway in Sparkwell which is currently designated as greenspace. Wishes a 1.808 ha portion of this designation be changed and considered for housing.  
                               |                | • Site has access issues but believe it could be an addition to site SH_49_09_14 and accommodate 60-70 dwellings." |
| LGS - Woolwell             | 3              | • Proposed greenspaces should be viewed as essential areas.  
                               |                | • Surrounding Pinewood Drive should be maintained due to proximity to ancient woodland.  
                               |                | • Bickleigh Parish Neighbourhood Plan Working Group propose the following sites for Local Green Space designations in Woolwell: Cann Wood View; Riverford Close; Play Park and Church Park Road and are currently out for consultation.  
                               |                | • Welcome the identification of the strip of land between Woolwell and the surviving trackbed of the historic Dartmoor Tramway as potential greenspace. |

**APPENDIX V: NEW SITES PUT FORWARD FOR DEVELOPMENT**

<table>
<thead>
<tr>
<th>Address</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chittleburn Business Park</td>
<td>• Extension to Chittleburn Business Park should be included for potential employment to help meet the demands of Sherford.</td>
</tr>
</tbody>
</table>
| Drake Memorial Park         | • Undeveloped area is available for future crematoria facilities for Plymouth.  
                               | • Designated for cemetery/burial use and want it safeguarded. |
| Forder Valley Road          | • Land near the filling station on Forder Valley Road that is currently identified as greenspace. |
### Address Details

<table>
<thead>
<tr>
<th>Address</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Holland Road Langage</td>
<td>◦ Would like it to be considered for development (residential or otherwise).</td>
</tr>
<tr>
<td>Land between Brixton and Elburton</td>
<td>◦ New site suitable for 5-500 homes and mixed use.</td>
</tr>
<tr>
<td>Land east of Haye Road</td>
<td>◦ Land should be allocated for cemetery and associated facilities to ensure continued and established use of memorial park and to safeguard opportunities to expand.</td>
</tr>
<tr>
<td>Site bounded by Elliott Road to the east</td>
<td>◦ New site should be considered for future development.</td>
</tr>
<tr>
<td>Site East of Bell Close</td>
<td>◦ Site should be considered employment.</td>
</tr>
<tr>
<td>Turnchapel Wharf</td>
<td>◦ Site should be considered/recognised as a marine employment site.</td>
</tr>
<tr>
<td>SH_58_12_08/14 Land at Cliff Road, Wembury</td>
<td>◦ This site should be considered suitable for development as relates well to the existing built form and has good access to Wembury’s services and facilities.</td>
</tr>
<tr>
<td></td>
<td>◦ There is reasonable expectation that growth will be delivered within the AONB, subject to suitable design and masterplanning.</td>
</tr>
<tr>
<td></td>
<td>◦ The site available for development includes but is significantly larger than the footprint of SH_58_12_08/14 and on this basis, the whole of the site should be reassessed.</td>
</tr>
<tr>
<td>Land to north west of Ivybridge</td>
<td>◦ Additional land is available for development in this location.</td>
</tr>
<tr>
<td>Land to west of Ivybridge</td>
<td>◦ Additional land is available for development in this location.</td>
</tr>
<tr>
<td>The Triangle (as marked on plan) Ottery, Lamerton</td>
<td>◦ This site should be considered for residential development in keeping with the Duke of Bedford style houses in the hamlet. Water and electricity are available on the site and there is road frontage.</td>
</tr>
<tr>
<td>Land to the rear of Follaton Bungalows, Plymouth Road, Totnes</td>
<td>◦ This site should be considered for development; it represents a sustainable extension to Totnes and would provide a mix of tenures, with a high provision of affordable housing for local need.</td>
</tr>
</tbody>
</table>

### APPENDIX VI: OTHER COMMENTS

<table>
<thead>
<tr>
<th>Theme</th>
<th>Comment Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whole Plan</td>
<td>◦ The use of online consultation format has made it difficult to engage with the process.</td>
</tr>
<tr>
<td></td>
<td>◦ The lack of policies at this stage of the process has made it difficult to comment.</td>
</tr>
<tr>
<td></td>
<td>◦ The JLP should seek to consider planning to a larger area, such as Devon and Cornwall or a South West region.</td>
</tr>
<tr>
<td></td>
<td>◦ Does the JLP mean anything now that Plymouth has broken away from the deal on a united Devon and Somerset?</td>
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<tr>
<td></td>
<td>◦ The hierarchical approach to allocating developments in settlements is supported.</td>
</tr>
<tr>
<td></td>
<td>◦ The proposal that the Councils prepare a Site Allocations Development Plan Document (DPD) in the event that Neighbourhood Plans do not enable development at the JLP rate is supported.</td>
</tr>
<tr>
<td></td>
<td>◦ All allocated sites should be tested against the sustainability objectives as part of the Sustainability Appraisal process.</td>
</tr>
<tr>
<td></td>
<td>◦ Too much information at once.</td>
</tr>
<tr>
<td></td>
<td>◦ Not clear what the relationship between those areas marked ‘Local Greenspace nominations’ and those areas listed as ‘rejected’ is.</td>
</tr>
<tr>
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<td>◦ Fully support the approach of a Joint Plan to deliver housing and economic growth.</td>
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<td>Arts, Culture and Heritage</td>
<td>◦ More stringent development management should take place in Conservation Areas; Article 4 of the Planning Guidance should be incorporated into the JLP policies.</td>
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<td>◦ The evidence base for the Plan may need to be supplemented to determine if there is any harm to the historic environment. Recommend that the Councils follow Historic England Advice Note 3: Site</td>
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<th>Theme</th>
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| **Economy**                  | • Employment should be the focus of the JLP.  
• Residential development should only come forward once more jobs are available in the area.  
• Broadband provision should be enabled through the JLP to support the creation of high quality employment.  |
| **Environment and Greenspace** | • The JLP should recognise that major development in the AONB is grounds for refusal to approve a site.  
• The Plan should give full weight to sections 115 and 116 of the NPPF and the presumption against any ‘major’ development within the AONB. Any new/proposed sites should be tested, explicitly, against the provisions of the current South Hams AONB Management Plan.  
• Protect South Hams AONB from development. Any new/proposed sites should be tested against provisions of current AONB.  
• Major development in AONB should be grounds for refusal and any size development should be carefully considered.  
• The JLP should afford better protection for the setting of Dartmoor Nation Park – views into the Park are just as important as those out looking of it.  
• The JLP should acknowledge the presence of the United Nations Educational, Scientific and Cultural Organisation (UNESCO) Biosphere Reserve and use ecosystem principles for the policy development.  
• South Hams District Council (SHDC) intends to adopt the strategic approach to cirl buntings and development set out in wildlife and development guidance note: Cirl Bunting (Devon County Council, Teignbridge District Council and RSPB, current working draft June 2016), therefore the JLP needs to reflect this and reference this document.  
• Consideration needs to be given to the guidance that will be given to the Neighbourhood Plan Groups when considering their own allocations. Many sites in the SHLAA packs have the potential to impact on cirl buntings.  
• The JLP should contain policies that meet the requirements of the NPPF for local planning authorities to move “from a net loss of biodiversity to achieving net gains for nature.”  
• The intention to subject the JLP to a Habitats Regulations Assessment is supported by the RSPB.  
• The proposed Local Greenspace Designations are welcomed by Natural England.  
• The option sites and the preferred allocation sites should be tested against the sustainability objectives as part of the Sustainability Appraisal process.  |
| **Getting Around**           | • The JLP should support infrastructure projects, such as the reinstatement of the rail link from Plymouth – Tavistock – Okehampton – Exeter.  
• The JLP should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.  
• Consideration should be given to impacts on level crossings associated with increased development.  
• Devon Countryside Access Forum submitted a Planning Position Statement giving advice to the council in terms of: reducing car use and improving health through the provision of access; existing Rights of Way and other access opportunities and other recreational space.  
• Recommend a Park and Ride scheme to the east of the city for South Hams traffic entering along the A379. Would be an invaluable contribution to the city’s traffic flow and loss of land would be minimal and reduce congestion and air pollution. External residents would also benefit in terms of employment, shopping, entertainment, hospital and other services and help address issues at Laira Bridge and benefit new development such as Sherford and Saltram Meadow.  
• Health and wellbeing should be supported with walking and cycling routes where appropriate but due to the topography and rural nature of Devon, cars are essential and should not be ignored due to any health and wellbeing policies.  |
| **Health and Wellbeing**     | • Plan makes no reference or cognisance of the important sporting and leisure contribution made by Plymouth Swallows Gymnastics Club.  
• Plymouth Swallows Gymnastics Club feels it offers a valuable resource to Plymouth’s Health and Wellbeing and Sports offer and may wish to continue to improve and expand to meet the needs of a growing, successful City and this should be recognised in the Plan.  |
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<td>Living and</td>
<td>• Build cost to purchase price should be a measure of success - current ratio is very risky.</td>
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<td>• At the moment price must be a multiple of build cost making building very profitable and purchase both costly and in the long term potentially risky.</td>
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<td>• National developers have previously not respected the local vernacular or the local landscape, other models of development should be considered, such as self-build, Rent Plus, Housing Development Trusts, and Tiny House schemes to allow development to be more in keeping for this area of Devon.</td>
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<td>• Development of housing specific to the needs of older people in rural areas should be supported; this will free up family homes for younger people and enable rural communities to meet their own housing needs.</td>
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<td>• Needs to be some sort of prioritising of the benefits of cost versus value (number of homes generated) and prioritise and deliver 5 sites before moving onto the next five and so on.</td>
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<td>• Preference for brownfield and unused areas before removing playing fields and greenspace, but understand providing affordable homes is paramount.</td>
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<td>• Homelessness is a key issue across the country and should be addressed through the JLP where possible.</td>
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<td>Local Community</td>
<td>• Many of the key services and facilities necessary for a sustainable community are beyond the scope of the JLP; how can it hope to have any influence over these services?</td>
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<td>• What can the JLP do to better support local Neighbourhood Planning Groups?</td>
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<td>• Needs to respond positively to meeting demographic needs across the entire JLP area.</td>
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<td>• Need to ensure that smaller rural communities are able to meet their own changing demographic needs. There is a recognised substantial shortfall for housing that is suited for over 55s and, more acutely, over 85s in rural communities.</td>
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<td>• A positively worded policy needs to be included to promote housing for older people within the small and large villages throughout the plan area.</td>
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**APPENDIX VII: LIST OF STAKEHOLDERS WHO COMMENTED**

Associated British Ports  
Barkingdon Manor Estate Managing Trustees  
Bickleigh Parish Neighbourhood Plan Working Group  
Biosphere Reserve Coordinator and Service Manager  
Blue Cedar Homes  
Boyer Planning  
Bratton Clovelly Parish Council  
Brixton Parish Council  
Buckland Tout Saints Parish Council  
Cavanna Homes  
Collier Planning  
Co-operative Group Ltd  
Dartington Hall Trust  
Dartington NP Group  
Dartington Parochial Church Council  
Dartmouth Town Council  
Design Development  
Devon Archaeological Society  
Devon Countryside Access Forum  
Devon County Council  
DIO Safeguarding  
Dittisham Parish Council
Sherford New Community Consortium
South West HARP Planning Consortium
South West Strategic Developments Limited
South West Water
Sport England
Sutton Harbour Group
Tamerton Foliot Village Conservation Society (TFVCS)
Tavistock Town Parish Clerk
Taylor Wimpey
The Drake Memorial Park Limited
The FA
Trustees of the Cann Estate
Wainhomes (South West) Holdings Ltd.
Walker Developments Ltd
Woodland Trust