

## Significant changes to Publication stage policies

## Appendix

Policy / Para	Organisation	Comment	Response
<b>DP1: High Quality Design</b>			
DP1	GOSW	There is too much onus on the applicant who is "required" to provide evidence, e.g. DP1, DP3, DP10. There does not appear to be balance to reflect proportionality of evidence requirements for different types of application.	Not all the evidence listed is 'required' for all proposals, but this was not clear within the pre-submission DPD. Therefore the introductory section (para 3.9) has been amended in chapter 3 to reflect this. The title has also been changed within the supporting text of each policy to 'Evidence that <i>may be required</i> from applicants to accompany planning applications'.
DP1: clause 1	Teignbridge District Council	Why only 2 landscapes mentioned - should this policy not apply everywhere?	Comment accepted. The 2 landscape characters have been deleted. The policy now requires all development to respect the character of <u>all</u> South Hams settlements and landscape.
DP1: clause 1	George Wimpey (Exeter)	Amend first para of DP1: 'All development will display good design which, in particular, respects...'	Policy wording changed in first sentence to include 'in particular', but no change to remaining part of sentence.
DP1: clause 1a	South Devon AONB	1a: design should respond to 'natural features of the area', as well as built features	Suggestion taken on board and the words 'and natural' inserted into policy criteria 1a
<b>DP2: Landscape Character</b>			
DP2	GOSW	Some policy wording appears to be onerous, prescriptive or lacking in clarity. However, exam process allows the Inspector to examine wording in detail, e.g. DP2 'conserve and enhance'	Policy wording clarified in the first sentence to include 'need to demonstrate how they conserve and/or enhance ...'
DP2: clause 1a	Teignbridge District Council	Core Strategy policy CS9 refers to landscape character areas rather than Land Description Units and Appendix 6 refers to Landscape Character Types.	Policy wording is amended to 'identified landscape character areas' which is consistent with the Core Strategy policy wording. Supporting text has been amended to clarify terminology.
DP2: clause 2	South Devon AONB Unit	There are currently no approved management plans for the South Hams coast.	The policy wording has been amended to refer to 'regional policy and local guidance'.
DP2: clause 2	Devon County Council (920)	The Coastal Zone should be a stand alone policy. Should make clear there is presumption against development in undeveloped coastal zone unless it complies with criteria set out in the RSS policy CO1. Ref to development proposals in undeveloped coast against Shoreline Management Plan (SMP) is questionable and needs to be clarified	No need for stand alone policy as regional policy CO1 is sufficient. Regional policy is referenced in policy criteria and supporting text. However, need to have criteria in South Hams policy in order to draw designation on the Proposal Map. Forthcoming Shoreline Management Plan will be relevant when it is adopted, as well as other local guidance and RSS policy, but as the SMP has not yet been adopted, the policy wording has been amended to 'regional policy and local guidance.'
<b>DP3: Residential Amenity</b>			
<b>No Substantive Changes</b>			

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<b>DP4: Sustainable Construction</b>			
DP4	GOSW	Some policies repeat higher level policy, e.g. DP4	Some changes to avoid repeating higher level policy. These are set out in response to other comments below.
DP4	Devon County Council	Include 'siting and orientation of the building to maximise passive solar gain where possible'.	New clause inserted into policy 'Buildings will be sited and orientated to maximise passive solar gain'.
DP4	The Dartington Hall Trust	Policy too onerous - sustainability needs to be viable	Various clauses have been deleted from the policy (no South Hams evidence available to inform policy).
DP4: clause 6	Devon County Council	Need to raise sustainable construction on major development proposals (Code level 5/6 on strategic urban extensions).	Clause deleted from policy (no South Hams evidence available to inform local policy). Local evidence would be required to support future changes in policy.
	Totnes Town Council	LPA should achieve highest possible Code for Sustainable Homes level 4 and implement a gradual increase	Clause deleted from policy (no South Hams evidence available to inform policy). Local evidence would be required to support future changes in policy.
	George Wimpey (Exeter) / The Dartington Hall Trust / Midas Homes	Re. CSH and BREEAM. Comments include inconsistency with RSS, lack of evidence to justify thresholds, impact on scheme viability and energy efficiency of homes should be controlled via building regulations.	Clause deleted from policy (no South Hams evidence available to inform policy). Local evidence would be required to support future changes in policy. Building Regulations are used to control energy efficiency of homes.
DP4: clause 7	Devon County Council / Midas Homes / George Wimpey (Exeter) / The Dartington Hall Trust	Re. 10% carbon dioxide offset target. Comments include inconsistency with and difficulty relating to RSS, lack of evidence to justify thresholds, impact on scheme viability, need for flexibility	Clause deleted from policy - RSS policy available (no South Hams evidence available to inform local policy).
DP4: clause 8	Millwood Homes (Devon) Ltd / South West RSL Planning Consortium / DPDS / George Wimpey (Exeter)	Re. Lifetime Home Standards. Comments include impact on scheme viability and density, lack of evidence to justify thresholds, need for flexibility, part M building regulations adequately cover disabled access.	Clause deleted from policy (no South Hams evidence available to inform local policy). Local evidence would be required to support future changes in policy.
DP4: clause 8	Devon County Council	Development should achieve 100% Lifetime Home Standards and policy should ref 10% of new dwelling built to meet Wheel Chair Standards. Clause 8 is mechanism to deliver clause 1 and should be linked.	Clause deleted from policy (no South Hams evidence available to inform local policy). Local evidence would be required to support future changes in policy.

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DP4: clause 9	Millwood Homes (Devon) Ltd	CHP: large scale development is not defined. CHP not always most efficient form of energy generation for site	No change. Policy has 'where appropriate' within the text, so will not apply if it is not the most efficient way to deliver sustainable energy to a scheme.
<b>DP5: Biodiversity and Geological Conservation</b>			
DP5	GOSW	Policy approach to SAC/SPA designation is not clear	Policy approach for SAC/SPAs is clarified by new criterion in DP5: 'Providing SACs and SPAs with the highest level of protection and enhancement'. Reference to having regard to the Habitats Directive has been added to clauses 2 and 3.
DP5: clause 1b	Torbay Borough Council	Natura 2000 (N2K) sites have not been specifically identified. South Hams SAC is afforded the highest level of protection under government and RSS. Need to cross reference with CS10. Need to refer in policy to these sites to 'clearly identify hierarchy of designated biodiversity sites' required under PPS9 and RSS ENV1.	Policy approach for SAC/SPAs is clarified by new criterion in DP5: 'Providing SACs and SPAs with the highest level of protection and enhancement'.
<b>DP6: Historic Environment</b>			
<b>No Substantive Changes</b>			
<b>DP7: Transport, Access and Parking</b>			
<b>No Substantive Changes</b>			
<b>DP8: Public Open Space, Sport and Recreation</b>			
<b>No Substantive Changes</b>			
<b>DP9: Local Facilities</b>			
<b>No Substantive Changes</b>			
<b>DP10: Gypsies and Travellers</b>			
DP10: clause 1d	Friends, Families and Travellers	Criteria (d) delete 'and the landscape' and add 'unduly' before harm. Any development could be turned down on these issues and have an impact.	Criteria (d): 'and the landscape' has been deleted as landscape is covered by the landscape policy DP2.
<b>DP11: Housing Mix and Tenure</b>			
DP11	GOSW	Some policies - unnecessarily negative wording, e.g. DP11	Policy wording changed to be more positive - 'should only' replaced with 'will'.
<b>DP12: Tourism and Leisure</b>			

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DP12: clause 2c	Bendalls Leisure Limited, Dartmouth Golf and Country Club	Criteria (2c) 'seek to re-use an existing building' is too vague and could be read to prohibit new buildings and facilities in the countryside. Clause does not properly reflect national and regional planning guidance for rural areas in PPS7 and RSS policy TO1. Clause 2c is not consistent with clause 2a of DP15. 2c should read 'make use of suitable existing buildings or previously developed land before proposing new buildings or development of greenfield land'.	Policy criteria 2c deleted as it repeats policy DP15 (2a), which provides a clear strategy for rural areas.
<b>DP13: Holiday Caravan, Camping and Chalet Sites</b>			
<b>No Substantive Changes</b>			
<b>DP14: Protection of Employment Land</b>			
DP14: clause 1c	South Devon AONB	Support protection of marine employment sites. But need to change policy slightly (1c) to 'the nature of the services provided at the site are not of strategic importance to the wider economy and can be met more suitably elsewhere'.	Criteria 1c is unchanged. But new criteria 1d inserted into policy as follows "the nature of the employment provided at the site is not of strategic importance to the wider economy nor has locational requirements that could not be met elsewhere". This does not change policy, but strengthens the protection of employment uses, such as marine employment sites, which are of strategic importance to the wider economy.
<b>DP15: Development in the Countryside</b>			
<b>No Substantive Changes</b>			
<b>DP16: Conversion and Reuse of Existing buildings in the Countryside</b>			
DP16	GOSW	Some policy wording appears to be onerous, prescriptive or lacking in clarity. However, exam process allows the Inspector to examine wording in detail.	Criteria 1c (now clause 2) to clarify that the use of a traditional building applies to residential (including holiday use) proposals. Criteria 1f clarified to include reference to traditional building.
<b>DP17: Residential Extensions and Replacement Dwellings in the Countryside</b>			
<b>No Substantive Changes</b>			
<b>DP18: Horse Related Uses and Structures</b>			
<b>No Substantive Changes</b>			