

Reference		Settlement	Paragraph	Proposal	Other	Legally Compliant		Sound		If Unsound			Representation		Appear?	Late Rep?
Respondent ID	Comment ID					Yes	No	Yes	No	Not Justified	Not Effective	Not Consistent	Comments	Suggested changes		
<b>Organisations and Agents</b>																
SA 0027	R 5036	Rural Areas												Adequate sewage treatment works capacity in all the settlements will be available to meet the allocations up to 2016 with the exception of Blackawton, Diptford and Ermington where sewage treatment works improvements may be necessary subject to investigation. Whilst SWW will endeavour to meet the demand beyond 2015 being the next investment period, the timing of any improvements that may be required to meet the demand will be subject to approval of future business plans by OFWAT. Localised improvements to both the water distribution and sewerage networks may be necessary which will be assessed on a site specific basis.		
SA 0040	R 5051	Rural Areas	5.1		Vision for the South Hams									In order that the police can attract funding for CIL or request facilities such as CCTV where appropriate, there needs to be a statement in the LDF which endorses designing out crime. Requests the following words to be added and suggests that it could be placed in the "Vision for South Hams" section. <i>Sustainable developments is one of the core principles underpinning planning. Crime, the fear of crime and anti-social behaviour has the power to destroy communities, undermine the quality of life and damage community cohesion. To ensure a better quality of life for all, every opportunity within the planning system must be taken to design out crime. Ensuring designing out crime is considered at the pre-planning discussions will reduce crime, save on the costs of crime and reduce the carbon footprint of that area. In addition this statement will demonstrate compliance with Planning Policy Statement 1 paragraph 36 and 37 and ODPM Safer Places The Planning System and Crime Prevention.</i>		

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SA 0139	R 5143	Rural Areas		All									<p>Considers that there are a number of aspirations for transport in the DPDs but consider that the potential outcomes of the plans in relation to transport are uncertain. In particular, it is not clear how the development would may impact on the SRN or whether proposals will assist in minimising and mitigating potential impacts.</p> <p>As a general requirement, require applications which exceed indicative thresholds in DCLG/DfT Guidance on Transport Assessments (March 2007) to be supported by a Transport Assessment (TA) or Transport Statement (TS). In light of the predominantly rural nature of the district, the Local Authority will require a Transport Assessment for all proposals outlined in the DPD exceeding 25 dwellings and for some non-residential floor space schemes falling under the DfT indicative thresholds depending on the site's context. A Travel Plan will be required for all major developments in accordance with Good Practice Guidelines.</p>			
SA 0139	R 5144	Rural Areas	5.4										The vision for the rural areas is supported, providing that future development within such locations is to meet local needs only.			
SA 0139	R 5145	Rural Areas	5.7										Objectives for the rural areas are supported, particularly RAO4. However, whilst many individual development proposals are small in scale and unlikely on their own to have a significant impact on the SRN, the cumulative effect of a number of development sites within a corridor could have a significant impact which should be considered.			
SA 0226	R 5255	Rural Areas											<p>Considers that the process is flawed because of the short timescales and oversimplification of the process, omission of the preferred options stage and inadequate consultation which have therefore lead to assumptions being made.</p> <p>Agree with the need for affordable housing.</p> <p>Suggest that there needs to be a complete reassessment of housing and employment figures.</p>			
SA 0226	R 5256	Rural Areas	3.3										<p>Considers that the SHLAA did not go into adequate detail in the villages and the decision to omit all villages without a secondary school and shop from the site options is questioned.</p> <p>Feels that 18 villages have received disproportionately large additions of development.</p> <p>Feels that the SHLAA did not distinguish between parts of a large site with different development potential.</p> <p>The SHLAA served the four main towns better than local centres and villages.</p>			
SA 0226	R 5257	Rural Areas	3.13										<p>Considers that there is no rationale between the SHLAA and the site options.</p> <p>Additional sites have not been considered in the STA or DRA.</p>			

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SA 0226	R 5258	Rural Areas	3.4										Notes Sustainability Threshold Assessment was carried out by Enfusion (Note to Inspector SA was carried out by enfusion STA was carried out in-house). Designations such as SSSIs, AONBs, National Parks, Local Nature Reserves and County Wildlife Sites have been ignored.			
SA 0226	R 5259	Rural Areas	3.5 - 3.6										Design Review Assessment and Enquiry by Design There was limited representation at the EbD events held in June 2009. The maps used at the event did not contain contours and therefore sites were chosen on unsuitable topography in Salcombe and Wembury. There was no reference to the SID or STA during the EbD events. Village and parish plans were not used and acknowledged by the PFBE. Feels that the late delivery of the report contributed to the omission of the preferred options stage.			
SA 0226	R 5260	Rural Areas	3.7										Considers that the Strategic Infrastructure Delivery Plan is missing details on roads, sewage, water, surface drainage and energy supply. Since this information has not been used to select sites, it contributes to making the documents unsound.			
SA 0226	R 5261	Rural Areas											Considers that the community consultation process has largely been conducted on the website without making use of alternative forms (eg radio and forms more familiar to the public) as such the communication has been unsatisfactory and little publicity has been given to the process.			
SA 0226	R 5262	Rural Areas											Considers that new documents should be written with established short term housing needs for affordable housing in mind. Open market housing should not enter into these needs. Planners should approach communities and where possible agree small, brownfield sites for the immediate needs.			
SA 0245	R 5382	Rural Areas	4.8			✓			✓	✓			The EbD workshops involved too few community members. The PFBE facilitators had no knowledge of the area and carried out a desktop study. Sites chosen at the EbD are not necessarily those selected by the community. There was not enough community involvement or participation.	No		
SA 0245	R 5383	Rural Areas	2.4			✓			✓	✓			The consultation with the public has not been as meaningful or as rigorous as the evidence seems to imply. Local people have not been involved early enough in the process and there has been no real opportunity to engage with the DPD before this stage. The EbD days were not meaningful consultation with local people as most of the participants were parish, town, district and county councillors and officers.	No		

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SA 0245	R 5384	Rural Areas	6.5			✓			✓	✓			The number of houses on the sites selected seems to be arbitrary and there is no local justification for the housing numbers.	Local evidence of need for specific housing numbers.	No	
SA 0263	R 5288	Rural Areas		All									Welcomes the extension to the consultation period but sees few signs of this leading to proper and full consultation with residents and local councils. Disappointed at the lack of public exhibition or explanation and little publicity outside of the website. The whole Preferred Options Consultation has been omitted and results in concern about the legality of the exercise.			
SA 0263	R 5289	Rural Areas		All									Question the basis for growth targets assumed or set given the new central government.			
SA 0263	R 5290	Rural Areas		All									Fully support need for limited, well defined development in Kingswear, Blackawton and Stoke Fleming, including the need for more affordable housing in all of these communities. One of the main concerns of the Dartmouth and Kingswear Society is the long, drawn-out process of the LDF which has left adopted Local Plans ineffective and very out-of-date, so completion of the new planning process is urgently needed. Despite this, the plans seem to have been completed in too short a time, leaving them open to criticism. The plans do not adequately consider alternative sites, some are very site specific, whilst others are over-generalized and lacking in vision detail. Most rely on green field sites. The needs of smaller villages (without primary schools) must not be left out of the forward planning process. Considers the plans are unsound.			
SA 0271	R 5296	Rural Areas											The Site Allocations DPDs are not in proximity to and do not affect any statutory designated conservation sites. However the South Hams Special Area of Conservation (SAC) interest feature, Greater Horseshoe Bats, use the wider countryside within the South Hams for foraging, commuting to foraging sites and travelling between the constituent roots of the SAC. Some allocated sites could have adverse impacts on the SAC if the developments do not consider the Greater Horseshoe bats during the design and planning of the sites. Natural England was consulted by South Hams during the production of the HRAs and does not disagree with the findings.			

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SA 0698	R 5385	Rural Areas				✓		✓				✓	<p>The plan is unsound as it fails to comply with PPS12 paragraph 8.2 as there is no provision made in the DPDs for waste management facilities. The LDF briefing paper: Waste issued by Devon County Council requests that the boundaries of waste management facilities identified in WPP1, WPP2, WPP3 of the waste local plan are shown on the proposals map. The plan is therefore unsound as because it does not take into account or refer to the allocated waste sites identified in WPP1, 2 and 3 of the adopted Devon Waste Local Plan.</p>	<p>The Rural Areas DPD should be revised to include all sites identified in the Waste Local Plan policies WPP1, 2 and 3 that are located within the South Hams DC boundary. Of specific interest is the allocation for a Strategic Waste Management Facility at New England Quarry (WLP ref SH17). The strategic significance of this potential waste site is such that the allocation of this site in the WLP should be fully reflected in the DPD: the extent of the red-line allocation should be included on a base-plan and supporting text should be included to explain the relationship between the DPD and WLP, and the opportunities and constraints associated with the SH17 allocation in the WLP. These amendments will ensure that the DPD is compliant with PPS10 and therefore sound.</p>	Yes	
SA 0774	R 51799	Rural Areas											<p>GOSW welcome the publication of the DPDs which appear to be in accordance with the adopted Core Strategy, based on robust evidence and which also appear to be based on a robust and in depth engagement with the communities served by SHDC.</p>			
SA 0774	R 51800	Rural Areas											<p>Paragraph 2.6 makes reference to the Regional Spatial Strategy (RSS). A letter from the Secretary of State for Communities dated 27th May 2010 sets out that the Government is committed to the early abolition of the Regional Strategies. This will apply to RPG10 as well as the emerging RSS for the South West. The Secretary of State has asked that LPAs and the Planning Inspectorate to have regard to this intention in decision making. Therefore the text in the DPDs may need to be amended once an announcement is made. The intention to abolish Regional Strategies is not in itself likely to be a soundness issue for these DPDs. The context for the plan is an adopted Core Strategy which provides the plan's essential framework to 2016. Planning for the delivery of homes remains an important objective. National policy will continue to provide the framework for local authorities in the absence of Regional Strategies and the evidence gathered to inform their preparation will be available to authorities. As you bring forward the DPD, you may wish to use this evidence or have your own.</p>			

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														If the Council is still comfortable with the levels of housing provision proposed in the DPDs, it is recommended that the Council makes progress to submission of the plans on the current time scale envisaged.		
SA 0774	R 51801	Rural Areas												In the context of the DPDs, GOSW supports the approach which provides certainty of the allocations for the first five years, within the framework of the adopted Core Strategy, followed by an indication of the direction and quantum of development following 2016. The review of the Core Strategy will be achieved by 2016.		
SA 0774	R 51802	Rural Areas												Subject to the scrutiny of the Planning Inspector, the evidence base in support of the allocations appears to be robust and appropriate for the purpose. The Design Review Assessment process is very interesting and it appears to have enabled significant engagement with the people in the neighbourhoods served. It is noted by GOSW that the DRA has informed not only the choice of allocations but those smaller villages that might be more appropriate to accommodate development. The form of bottom up engagement in plan preparation is supported.		
SA 0774	R 51803	Rural Areas												GOSW note that there appears to be robust evidence on the type of infrastructure that is needed to support development and neighbourhoods. This evidence has been prepared with the County Council and other infrastructure providers. The Council will want to satisfy itself that the infrastructure expectation set out in appendix 1 of each DPD, particularly for 'big ticket' items such as schools, reflects or are flexible enough to respond to any funding programme changes that might be forthcoming following the Government's Budget announcements to significantly reduce public sector spending.		
SA 0774	R 51804	Rural Areas												Employment and commercial allocations appear to be generally and broadly described as such in the plans proposals e.g. RA 1 and RA2. The plan might be improved if it was possible to provide more policy guidance of the type/nature of employment and commercial development that would be appropriate at these allocations. PPS4 provides national guidance on these matters.		

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SA 0774	R 51805	Rural Areas											Some site allocations include a 'grey' edge rather than a firm line. These appear to reflect that these allocations are development either wholly or partially beyond 2016. All allocations up to 2016 probably should have a firm definition. It might be that intended directions of locations of development beyond 2016 can be indicated, with the intention that they are firmed up following review of the Core Strategy. This might be a matter that the Inspector can provide more clarity on. It does not appear to be a matter which leads to question the soundness of the plan.			
SA 0774	R 51806	Rural Areas											It is presumed that the Development Policies DPD recently found to be sound will provide the framework for ensuring that the proposals emerging on the various allocations will be managed so as to provide for sustainable development. However, if there are any specific actions on sites that might address carbon reduction, the plan might be improved if these are included as part of the allocations.			
SA 0774	R 51807	Rural Areas											GOSW note that the proposed allocations amount to 550 dwellings to the period to 2016 which is only 50 dwellings short of the Core Strategy policy to provide 600 to 2016. GOSW do not think that this is a significant conflict with the Core Strategy for a number of reasons. Firstly, this DPD provides a framework beyond 2016 which addresses this minor shortfall. GOSW would expect consents for some homes in the rural areas to have reduced this gap since the CS was adopted. There will continue to be windfall planning consents on sites not allocated. If the Inspector is provided with sufficient information and justification it might be open to him/her to include additional allocations if that was felt merited and appropriate. Broadly, the allocations appear to be appropriate to the places by way of scale and sustainability in relation to services and facilities at those places. It is further noted that the evidence base supports with reason the choice of allocations where allocations are being made.			
SA 0993	R 51798	Rural Areas											South West Councils Strategic Leaders Board and the South West Regional Board will only respond with a further letter if it is considered that there are significant issues relating to the implementation of the Regional Strategy.			
SA 0994	R 51797	Rural Areas											The Coal Authority have no specific comments to make on the document at this stage.			

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SA 0995	R 51808	Rural Areas											The County Council is reaffirming the policies set out in the adopted Devon Structure Plan and these strongly support focussing development located at the main urban areas at the market towns. Similarly, it supports the broad scale of development being proposed in the context of the most recent assessments of housing needs within the South West Devon area. DCC has no strategically significant specific policy objections to the proposals.			
SA 0995	R 51809	Rural Areas											DCC has no overall objections to the proposals as Education Authority and increased housing development is not anticipated to require action except where appropriate requirements have been properly included in the Infrastructure Delivery programmes attached to each document.			
SA 0995	R 51810	Rural Areas											A number of sites have potential environmental and/or archaeological interest which will need to be considered when applications for development or the production of masterplans are proposed.			
SA 1021	R 53232	Rural Areas											No specific comments relating to Rural Areas DPD.		L	
<b>Individuals</b>																
SA 0697	R 5386	Rural Areas											At the publication stage of the DPD, members of local communities should not feel that they have to make as many changes to the DPD as is the case in the South Hams. This means the consultation process has not been as vigorous or as inclusive as it should have been which means the DPD is unjustified.			
SA 0697	R 5387	Rural Areas											Responding to the DPDs on the portal is difficult as it requires responses to specific paragraphs. This wouldn't be a problem if there were not huge gaps in the DPD which need addressing. Using the portal is frustrating and time consuming and the emails generated by this are significant. Sometimes commenting by paragraph isn't helpful when there are issues running through the DPD. SHFoE found that there are general issues which need to be responded to in all DPDs. It is time consuming and frustrating to get issues and changes across on the portal. Questions the cost of the portal and the number of people who have used the portal to make comments.			

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SA 0697	R 5388	Rural Areas											The forms are difficult to complete. People do not feel as if they know what is going on. The DPDs should not be generating anxiety at this late stage because the meaningful community consultation should have been done. There is anger over the sites that have been selected, the building on greenfield sites, the lack of affordable housing and the scale of development and members of the public do not know which test of soundness their concerns relate to. Those who have filled in the form on line have found that there is not enough space to write, which requires an additional document to be attached which is complicated and could easily be simplified.			
SA 0999	R 53253	Rural Areas											Raise concern about consultation process and ease of participating in the DPD.			