

APPENDIX O:

CONSULTATION COMMENTS AND NEIGHBOURHOOD PLAN STEERING GROUP RESPONSES

The table below summarises the comments submitted to the Regulation 14 draft Pre-submission Consultation Draft Neighbourhood Plan and how these comments have been considered by the Neighbourhood Planning Steering Group (NPSG) and have informed the amendments made in the Regulation 15 Submission version of the draft Neighbourhood Plan.

Consultee	Comments	NPSG response
<p>1. BT Open Reach</p>	<p>Paragraph 8.4 Openreach provides Fibre To The Premise (FTTP) to all developments where there are 30 or more plots. This is ultrafast fibre with speeds up to 1Gbps. This can be provided to developments with less than 30 plots but a developer’s contribution would be required. I therefore recommend that a statement such as <i>"All major developments within xxxxxx local authority area will enable Fibre to the Premises (FTTP) with open access to provide ultrafast broadband capability and customer choice of service providers. For smaller schemes the Council will expect FTTP to be provided where practical and where this is not the case connection to broadband that will deliver</i></p>	<p>We have no site allocations and agree that FTTP is best dealt with at district level through the local plan. No change</p>

	<p><i>speeds above 20Mbps</i>” is included in the local plan. I believe this will support the parish neighbourhood plan in its desire in delivering high speed broadband to all new developments.</p>	
<p>2. Environment Agency Marcus Salmon - Sustainable Places Planning Specialist</p>	<p>We support the objectives of the plan, especially the objective to <i>‘conserve and enhance the Parish’s natural environment for future generations of residents and visitors.’</i></p> <p>Likewise we support Policy TP1 in respect of General Development Principles (especially with regard to the natural environment and infrastructure provision), Policy TP22 in respect of the Natural Environment and Policy TP23 regarding Coastal Management.</p> <p>However, we note that there are no references in the draft plan to other issues pertinent to the Environment Agency, in particular flooding and water quality. For information, a copy of our letter of 20 April 2015 to South Hams District Council in response to the neighbourhood area designation consultation is provided below. Our letter highlighted the main issues with regard to flood risk, coastal erosion and water quality in the parish.</p>	<p>Support for the Plan Objectives and Policies TP1 – General Development Principles, TP22 – The Natural Environment and TP23 – Coastal Management are welcomed.</p> <p>Thank you for forwarding us your letter of 20 April 2015 to SHDC.</p> <p>Since managing flood risk and water quality impacts are the subject of DEV 37 of the emerging JLP and no sites are allocated in the Plan, we do not propose to repeat the policy.</p> <p>In terms of coastal erosion, the supporting text of TP23 – Coastal Management has been amended to refer to the current Shoreline Management Plan for the area.</p>

<p>3. Highways England Gaynor Gallacher – SW Operations Division</p>	<p>Highways England is responsible for operating, maintaining and improving the strategic road network, which in this case comprises the A38(T) which runs some distance to the north of the plan area. As the plan area is therefore located some distance from our network we have no comments to make on the plan’s proposed policies.</p>	<p>Noted. No change.</p>
<p>4. Historic England David Stuart, Historic Places Adviser South West</p>	<p>Such is the number of neighbourhood plan consultations we receive we are unable to respond to them all in as much detail as we would wish. Our attention tends to focus on those which include site allocation proposals as these have the greatest potential for impact on heritage assets. We note that the Thurlestone Plan doesn’t include such policies but the degree of emphasis given by it to the protection and enhancement of local historic character has attracted our attention.</p> <p>Many Plans share similar aspirations but not all develop them to the extent displayed by Thurlestone’s. Not only is there a specific schedule of identified non-designated assets substantiated by evidence but a dedicated policy. We are further impressed by the creation of the Assets Trail as a tangible</p>	<p>Support for the degree of emphasis given in the Plan to the protection and enhancement of local historic character, specifically, the School Heritage Trails and Policy 21 – Non-designated Heritage assets, is welcomed.</p>

	<p>demonstration of the wider involvement of the community in celebrating and valuing its distinctive heritage.</p> <p>It therefore remains only for me to offer our congratulations to your community on the preparation of its Plan. Unless the Plan changes significantly we do not envisage needing to make further comment as it moves forward and we wish it well in its progress to being made.</p>	
5. Marine Management Organisation	<p>The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p>	Noted. No change.
6. National Grid Robert Deanwood – Consultant Town Planner	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the</p>	Noted. No change.

	<p>Neighbourhood Plan area.</p> <p>National Grid's full response is set out in its letter dated 28 Sept 2017</p>	
<p>7. Natural England Darren Horn Planning Adviser – Devon, Cornwall and Isles of Scilly Team</p>	<p>We are pleased to see that the richness of the local environment and the value placed upon it by the local community comes through in this document.</p> <p>It is stated in paragraph 7.12 that there are no statutory sites for biodiversity in the parish. However, there is an area of nationally designated Marine Conservation Zone along the western border (Devon Avon Estuary MCZ). This could be incorporated into the map in Figure 24.</p> <p>In addition to designated sites the Parish contains many areas of Priority Habitat, including deciduous woodland, good quality semi-improved grassland, traditional orchards and coastal and floodplain grazing marsh. We are pleased to see that the document supports habitat creation, connecting these assets together through an integrated green infrastructure plan would help to boost biodiversity and increase the local</p>	<p>Support for the value placed upon the local environment by the local community in the Plan is welcomed.</p> <p>The Devon Avon Estuary MCZ has not yet been designated. <i>[NE has since asked us to disregard this comment.]</i></p> <p>Agreed. We have added a further criterion in TP22 relating to priority species and priority habitats and amended the supporting text accordingly.</p>

	<p>environment's resilience to the effects of climate change. There may already be a strategy in the emerging Joint Local Plan, in which case the NP may be able to complement it at a more local level.</p> <p>There is some confusion in the document around land allocations. It needs to be made clear as to whether the extensions to Thurlestone's settlement boundary constitute allocations: Appendix A (page 98) that <i>'Individual plots or small-scale development sites that provide rounding off opportunities in areas physically and visually related to the built form of the settlement are included'</i>.</p>	<p>The land referred to in the south-east corner of Thurlestone shown in Figure 7 is a consented scheme of 8 dwellings, which is presently under construction and being marketed. <i>[NE has since confirmed that it is happy with this clarification.]</i></p>
<p>8. South West Water</p>	<p>No comment at present, but happy to provide further comment as and when development proposals are formalised.</p>	<p>Noted. No change.</p>
<p>9. RSPB Helene Jessop – Assistant Conservation Officer</p>	<p>Paragraph no 2.19: Vision Suggest a more ambitious vision for the natural environment, so recommend amending from <i>"the preservation of the natural environment"</i> to <i>"conservation and enhancement of the natural environment"</i>. Nature is in trouble and many species are in decline, so an ambition to enhance as well as protect the various natural</p>	<p>Agreed. The Vision has been amended.</p>

	<p>and farmed habitats in the parish will be beneficial.</p> <p>Policy No TP5: Reuse of Farm and Rural Buildings</p> <p>Re part IV, in our view it is not adequate to just require appropriate ecological survey to assess impact of proposals, there needs to be an amendment to include the requirement that any adverse impacts will be appropriately mitigated. Many farm and rural buildings will host protected species including bats and barn owls, and other species such as swallows. Re-use including conversion should take account of legal requirements and ensure that provision is made for continued presence of those species via appropriate integral nest/roost sites. Additionally such re-use is an opportunity to provide enhancements for wildlife, eg, via integral 'nest bricks' that provide cavities suitable for use by a range of birds including house sparrows, starlings and swifts, all of which are in decline. Suggest the amendment is "<i>. . . on protected species, to propose appropriate mitigation and ensure that, as a result of the development, there is no loss of existing biodiversity interest.</i>"</p>	<p>Agreed. TP5 criterion IV has been amended.</p>
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	<p>Policy TP15: Change of use of Farm and Rural Buildings Same comment as for Policy TP5. Suggest the amendment is "<i>. . . on protected species, to propose appropriate mitigation and ensure that, as a result of the development, there is no loss of existing biodiversity interest.</i>"</p> <p>Policy TP22: The Natural Environment Recommend amendment to include commitment that biodiversity is protected and enhanced. Suggest II is amended to "<i>any proposals that affect wildlife sites and habitats should be minimised and, where there is likely to be harmful impact on protected and priority species or priority habitats, proposals for mitigation and or compensation as necessary form part of the application. Opportunities to provide enhancement for biodiversity should be included whenever possible.</i>"</p> <p>Chapter 6: The Natural Environment The RSPB recorded 5 breeding territories of ciril buntings in Thurlestone Parish in the most recent national ciril bunting survey in 2016. Three of these territories were between Thurlestone and Buckland and it is possible that development within the proposed settlement</p>	<p>Agreed. TP15 has been amended.</p> <p>Agreed. TP22 criterion II has been amended.</p> <p>Agreed. The supporting text on biodiversity has been amended to refer to the findings of the RSPB's 2016 ciril bunting survey.</p>
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	<p>boundaries may remove habitat used as part of those territories. While the RSPB does not have an in principle objection to such development, we wish to highlight the need to ensure that appropriate mitigation/compensation measures are proposed. As ciril buntings need a mix of hedges/scrub (for nesting sites), invertebrate-rich grasslands (summer feeding sites) and weedy areas (winter feeding sites), simply retaining existing hedges or planting new ones may not be sufficient, so providing replacement areas of suitable habitat equivalent to that lost to any development is recommended so that Thurlestone can retain its ciril bunting population. Prior to the 2016 survey, the RSPB had not recorded ciril buntings breeding in the parish in previous surveys, so the 2016 results are a sign that the parish includes suitable farmland habitats for this rare farmland bird (South Hams district supports c60% of the UK population). Farmland that supports ciril buntings will support other wildlife too. To retain ciril buntings, it is important that Thurlestone retains mixed farming (pasture and arable) of the type that provides habitat for grasshoppers and plenty of seeds for birds in winter (eg, from weedy winter stubbles).</p>	
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<p>10. Devon Countryside Access Forum (DCAF) Hilary Winter – Forum Officer</p>	<p>I am attaching the DCAF's position statement on Neighbourhood Plans. The Forum would be grateful if you could cross-reference the Plan against this statement to ensure that all the matters raised have been considered during the process.</p>	<p>Noted. No change.</p>
<p>11. Devon County Council - Historic Environment Team</p>	<p>Introduction and Around the Parish Overall, a good insight into the character of the parish assisted with stunning pictures.</p> <p>6. Heritage – Objective Suggest taking out the word ‘certain’ and also include protection of designated heritage assets.</p> <p>Para 6.1 (Background) Re number of listed buildings and absence of reference to Scheduled Monuments and other heritage assets.</p> <p>Policy TP5: Reuse of farm and rural buildings Suggest V – any application must be supported by the required archaeological surveys and reports in order to assess the impact of the proposed development on the building and provide a record of the historic fabric.</p>	<p>Support for the Plan’s Introduction and Around the Parish are welcomed.</p> <p>Agreed. The word ‘certain’ in the Heritage Objective has been deleted.</p> <p>Most of Historic England’s Grade 2 listed buildings in the parish comprise 2 or more individual properties (as listed on page 69). There are references in paras 6.3 and 6.4 to the Scheduled Monuments, but the Plan focuses on non-designated heritage assets which have no statutory protection.</p> <p>Agreed. TP5 has been amended.</p>

	<p>Policy TP15: Change of use of farm and rural buildings</p> <p>Suggest IV – any application must be supported by the required archaeological surveys and reports in order to assess the impact of the proposed development on the building and provide a record of the historic fabric.</p> <p>The Historic Environment Team’s full response is set out in its letter of October 2017 and attached baseline information.</p>	<p>Agreed. TP15 has been amended.</p>
<p>12. Thurlestone Golf Club Manager, Simon Bawden</p>	<p>Section 5. Wellbeing Para 5.19 (Change of Use to OSSR)</p> <p>Correction to reference to 1,040 full-time members of Thurlestone Golf Club. The correct breakdown of membership is</p> <p>Full 533 80 yrs + 48 Social 229 Intermediate 43 Juniors 86 of which 12% are girls Tennis 81 Giving a total membership of 1020</p>	<p>Agreed. Para 5.19 has been updated.</p>

	<p>Section 5 - Wellbeing</p> <p>As a key stakeholder and substantial employer in the local area Thurlestone Golf Club with 12 tennis courts provides recreational facilities for the local and wider community. The health benefits of sport and in particular golf have been well documented. TGC also attracts tourism through visiting golfers from all over the South West and beyond. It also maintains significant section of the coastal landscape (providing Thurlestone its unique character) and takes an active and responsible role in defending and, insofar as possible, mitigating the effects of erosion on the coastal path. Furthermore it maintains three beaches that are open to and used by residents and visitors alike.</p> <p>For further understanding and integration TGC is always happy to engage with local groups.</p> <p>Paras 8.19 - 8.22 (Air ambulance night landing site)</p> <p>TGC would also be open to discussion with regard the provision of an Air Ambulance helipad.</p>	<p>The supporting text to TP23- Coastal Management has been amended to refer to the Golf Club’s role in maintaining a significant section of the coastal landscape, its role in defending and mitigating the effects of erosion on the coastal path, and maintenance of three beaches.</p> <p>Noted and welcomed. Site suitability ultimately rests with Devon Air Ambulance Trust.</p>
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<p>13. Philip and Vera Pailthorpe</p>	<p>Policy Nos TP1 to TP29 inclusive We fully support this document. We really appreciate the time and energy put in by local residents to produce our parish neighbourhood plan. It is very important that local people have a say in how Thurlestone is to be developed in future years.</p> <p>This document covers all aspects supported by strong technical arguments to give Thurlestone a brighter outcome for the future of the village with good guidance for future planning applications within this Area of Outstanding Natural Beauty. It is vital to ensure that this area is protected from over-development for future generations.</p>	<p>Support for the Plan and all 29 of its policies is welcomed.</p>
<p>14. Phil Millard Former Thurlestone Parish clerk</p>	<p>Policy TP2: Settlement Boundaries I support this policy very strongly - as it will define the current boundaries of both Bantham and West Buckland. Thurlestone already has this and it will provide clarity for future development of the area.</p> <p>Policy TP4: Open Market Dwelling Agree that any new housing should be infill and should be small scale.</p>	<p>Support for TP2 in respect settlement boundaries for Bantham and Buckland is welcomed.</p> <p>Support for TP4 is welcomed.</p>

	<p>Policy TP6: Principal Residence Requirement Support this policy very strongly- will help housing needs of local people and help the area become a year round community.</p> <p>Policy TP7: Replacement Dwellings & Extensions Strongly agree with this Policy - as a Parish Clerk for 8 years in Thurlestone - there have been quite a few examples of over development when houses have been replaced in recent years.</p>	<p>Support for TP6 is welcomed.</p> <p>Support for TP7 is welcomed.</p>
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<p>15. Alex Williams Owner of Higher Aunemouth Farm and campsite</p>	<p>Para 2.27, Fig 8 I have an observation about the settlement boundaries and something which I would like clarification on. The settlement boundary around Bantham includes Sloopside but then does not include the storage building/barn (owned by the estate) at the bottom of that lane. It then goes around and includes Wragmoor but then seems to cut the allotment in half instead of including the whole allotment. If the NP is going to support the potential for developing properties for the rental market, at sensible rental prices and specifically as principal residences for local people to live in the village all year round, I feel this is going to difficult to achieve with such a tight boundary settlement. Would the committee mind justifying the reasons for this boundary settlement?</p> <p>Policy TP11 – Caravan, camp & chalet sites I realise that the questionnaire showed that there was little support to for the development of new caravan or campsites, however, given that there is much support for more facilities in the parish such as farm shops, cafes,</p>	<p>The settlement boundary criteria are set out in Appendix 1 of the Plan and the Settlement Boundary Topic Paper. The allotments on the land included within the settlement boundary are currently in use and therefore a functional part of the settlement. The rest of the field has been left fallow for the past 6/7 years and therefore does not qualify under the settlement boundary criteria. However, this does not rule out affordable housing on this land, i.e. a village housing initiative or community-led housing, in accordance with TP3.</p> <p>There was strong community opposition to new caravan and campsites (78%) in parish given its location within the AONB, Heritage Coast and Undeveloped Coast, and traffic issues. However, TP11 is a</p>
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	<p>restaurants, and artisan/craft workshops, I believe that more opportunities for people to visit and holiday in the parish either camping or caravanning/camper vans would support and help sustain these types of facilities.</p> <p>I would say that there aren't enough accommodation options for visitors in the parish and those that exist are prohibitively expensive. Caravan and campsites do at least provide more accommodation options but are not going to be a permanent built fixture on the landscape.</p> <p>Para 4.18 states that there is support for seeking ways to extend the tourism season throughout the year and if farmers were allowed to open fields for camping/caravans/camper vans other than just during the school summer holidays, it might go some way towards achieving this.</p>	<p>criteria-based policy which does support the extension of existing caravan and campsites. No change.</p>
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<p>16. Mrs Elizabeth Webb</p>	<p>Paras 2.27, 2.29 and Policy TP2: Settlement Boundaries It is excellent that Bantham and Buckland will now have settlement boundaries. This will prevent both expanding outside the present "boundaries". It is vital that Buckland and Bantham remain as separate entities.</p> <p>Policy TP11: Caravan, Camp and Chalet Sites It is important that there are no new caravan sites.</p> <p>Paras 3.24, 3.28 and Policy TP3: Affordable Housing Smaller sites of affordable housing is much better than larger sites where the inhabitants still feel isolated from the rest of the community. Social housing must be for people with a local connection in perpetuity. Any new housing must be affordable for local people.</p> <p>Policy TP6: Principal Residence Requirement New building must be for full time residents.</p>	<p>Support for TP2 in respect of settlement boundaries for Bantham and Buckland and the supporting text in paras 2.27 & 2.29 is welcomed.</p> <p>Support for the second part of TP11 is welcomed.</p> <p>Support for TP3 and the supporting text in paras 3.24 & 3.28 is welcomed.</p> <p>Support for TP6 is welcomed.</p>
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<p>17. Elisabeth Meldrum</p>	<p>Thurlestone Neighbourhood Plan is an excellent document. Background information and abundant illustrations are valuable in setting the context within which each of the policies is placed. A list of Objectives (page 15) gives a clear overview of the aim to conserve the outstanding natural beauty of the parish but also looks forward to support a lively community living here.</p> <p>TP4- Open market housing IV Who is to assess the excellence governing this exception which relates to a dwelling whose design is of exceptional quality?</p> <p>Local Economy - para 4.20 & 4.21 Para 4.21 refers to the expansion of hotels and pubs which could have a harmful impact on already congested narrow roads, the limited infrastructure and the South Devon AONB. The same could be said about cafes/restaurants.</p> <p>New marine-related workshops - para 4.30 Workshops for marine-related activity need to be small-scale; they are in keep with local traditions; I support them.</p>	<p>Support for the Plan, its Objectives and Vision is welcomed.</p> <p>Agreed. The special circumstances in second part of TP4 (including IV) have been deleted.</p> <p>Policy TP9 – Expansion of existing businesses is subject to criterion VII of TP1 which addresses traffic impact. No change.</p> <p>Support for TP13 is welcomed.</p>
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<p>18. M. J Sparrow</p>	<p>I agree to all aspects of the Neighbourhood Plan. A first rate document which I would like to see vigorously pursued and agreed to by all parties.</p>	<p>Support for all aspects of the Plan and its implementation is welcomed.</p>
<p>19. Michael Wheldon</p>	<p>This Plan is very well considered and fully thought through and has my unreserved support. There are several issues that I particularly want to endorse:</p> <ol style="list-style-type: none"> 1. The settlement boundaries are properly and reasonably delineated and should be confirmed without change. 2. I hope that the current environment of Bantham village can be maintained without change, particularly the attractive street scene. 3. The Coronation Boathouse and quay give a most attractive environment and should be maintained for the building, storage and use of the boats on the Avon. <p>RE: TP25 – Car park I think that additional parking in Bantham is unnecessary. A significant area of the Ham is made over for parking and is not fully used nearly all the time. Since the fields are all</p>	<p>Support for the Plan is welcomed.</p> <p>Support for TP2 – Settlement Boundaries is welcomed.</p> <p>Support for protection of the Bantham street scene, and the protection and marine-related use of Coronation Boathouse is welcomed.</p> <p>Agreed. TP25 has been amended to refer only to Thurlestone.</p>

	<p>owned by the same landlord, it is very unlikely that he will set aside additional land without charging for it and there is sufficient parking for all users if they are prepared to pay. The attraction of the local environment is of green fields unaffected by any development, and it should be maintained undeveloped in this form as long as possible.</p>	
<p>20. Bruce Murray Acting Chairman of the Mead Management Company</p>	<p>Policy TP1- General Development Principles Particular account should be taken of the very limited access via single track roads. During the busy period in summer time to reach a main road can easily double. This makes commuting difficult from these villages.</p> <p>Policy TP2 – Settlement Boundaries Fully support the need to keep a clear boundary between settlements.</p> <p>Policy TP3 - Affordable Housing There is a chronic lack of affordable housing in the South Hams. However, new affordable housing should be driven by local employment and in view of the transport limitations this is likely to be working from home. BT has failed to provide sufficiently fast Broadband connectivity</p>	<p>Criterion VII of TP1 addresses traffic impact. No change.</p> <p>Support for TP2 is welcomed.</p> <p>The second part of TP8 - New economic proposals – supports proposals that facilitate homeworking, and TP24 supports a Community Wifi network to improve connectivity in Bantham and Buckland. No change.</p>

	<p>to many properties in the area and needs to act to fix this.</p> <p>Policy TP7 – Replacement Dwellings & Extensions Replacement dwellings should not include demolition of bungalows to be replaced by houses, especially where such rebuilding is out of character with the surrounding homes.</p> <p>Para 3.54 (Housing for older people) Retaining and extending the stock of bungalows for elderly and disabled residents is crucial.</p>	<p>Support for TP7 and para 3.54 of the Plan is welcomed.</p>
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<p>21. Porta Planning LLP on behalf of Church Farm (Amenities) Limited</p>	<p>The Plan’s housing objective seeks for small-scale housing in the Parish, of the right type and in the right location, and for it to contribute towards making the Parish more sustainable in the future. The Plan does not allocate any sites for development but instead takes a holistic approach to sustainable development by looking at the Parish in the context of the village network.</p> <p>As part of the Plan, the boundaries for settlements have been reviewed and assessed, including Thurlestone. The policies in the Plan prioritise infilling and the protection of the Countryside and the Plan states that <i>“in accordance with the wishes of the community, the settlement boundary for Thurlestone to ‘largely remain ‘as is’ (subject to three minor revisions) so as to prevent further sprawl into the open countryside (AONB, Heritage Coast and Undeveloped Coast)”</i>.</p> <p>Church Farm supports the proposed retention of the existing settlement boundary for Thurlestone, as illustrated in Figure 7 (Policy TP2 – Settlement Boundaries). This approach will ensure that the character and sustainability of Thurlestone will be protected and that only</p>	<p>Support for the proposed retention of the existing settlement boundary for Thurlestone, as illustrated in Figure 7, is welcomed.</p>
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	<p>appropriate, small-scale infill housing developments will be brought forward.</p> <p>Policy TP4 – Open market housing, part 2, states that <i>“proposals for open market housing on land adjoining the settlement boundaries designated in this Plan, including agricultural or amenity land, and in the open countryside within the South Devon AONB, Heritage Coast and Undeveloped Coast will not be supported unless there are special circumstances, such as...” etc.</i></p> <p>This Policy allows for sites adjoining defined settlement boundaries in the Plan to be brought forward for open market housing developments, subject to adhering to the special circumstances criteria. Notwithstanding this, it is our opinion that this approach does not accord with the objectives of Policy TP2 which seeks for small-scale infill development located within the defined settlement boundaries, so as to prevent further sprawl into the countryside.</p> <p>As currently worded, Policy TP4 provides the opportunity for agricultural land surrounding</p>	<p>.</p> <p>Agreed. The special circumstances in second part of TP4 have been deleted.</p>
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	<p>Thurlestone to be brought forward for future housing development. We request that Policy TP4, part 2, is amended to exclude Thurlestone, as the village has seen 38 completely new or additional dwellings since October 1998, of which 13 have been granted since 2014 (para 3.30 of the Plan). Any further development outside the defined settlement boundary, would significantly impact on the character and sustainability of Thurlestone village and result in further sprawl into the countryside.</p> <p>Porta Planning's full response is set out in its letter dated 26 October 2017.</p>	
<p>22. Nicola Lynch</p>	<p>Para 1.5 (Introduction) The challenge for the parish is to balance the housing needs of local people and the conservation of the unspoilt and undeveloped character of the area which is its main attraction for both residents and visitors who are essential to the local economy. The impact of tourism, particularly though not exclusively in relation to its affect on housing, needs to be managed in order to maximise its benefit to the area and local people.</p>	<p>The supporting text has been amended to reflect the fact that it is the unspoilt and undeveloped character of the area which is its main attraction for both residents and visitors who are essential to the local economy.</p>

	<p>Para 1.12 (introduction) There is concern about the protection of the Scheduled Ancient Monument at Bantham Ham in light of recent events such as Tribal Clash, the shoot and other commercial activities. What is the impact of these on the ancient monument? Does it need a greater level of protection?</p> <p>Policy TP2 – Settlement Boundaries and para 2.27 Defining settlement boundaries for Bantham and Buckland is essential to protect the historic individual character of both villages and the surrounding countryside in perpetuity.</p> <p>Para 3.37 (Open Market Housing) Any development in the three villages needs to be proportionate to the size of the existing settlements. Infill is the most appropriate approach. The priority must be to respond to the need for affordable housing for local residents and to protect this through the use of principal residence requirements.</p>	<p>This Plan only deals with non-designated heritage assets that have no statutory protection but contribute to ‘our sense of place’. The Scheduled Ancient Monument at Bantham already has the highest level of protection. Any further information would need to be obtained from Historic England. No change.</p> <p>Support for TP2 in respect of settlement boundaries for Bantham and Buckland is welcomed.</p> <p>Support for TP4 and specifically, criterion 2 (principal residence requirement) is welcomed.</p>
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<p>23. Graham Gilbert</p>	<p>Policy TP2 – Settlement Boundaries I strongly agree with the policy of drawing a tight settlement boundary around the three villages and the specific reference to not permitting a coalescence between Bantham and Buckland. However, the need for affordable homes is made elsewhere in the plan and there is an obvious rounding line east of the Valleyside properties in Buckland which, if the settlement boundary was adjusted, would allow up to 10 such properties to be provided for without prejudicing quality agricultural land.</p> <p>Policy TP4: Open Market Housing I believe that the wording of Policy TP4 (P34) should remove the special circumstance sub section ref: 2. iv. Allowing open market housing outside the settlement boundary because the design is "truly outstanding or innovative" leaves the Parish vulnerable to the vagaries of what someone in Authority decrees as outstanding or innovative - no doubt someone believes that the carbuncle recently approved to be built on Burgh Island falls into such a category!</p>	<p>Support for TP2 is welcomed.</p> <p>The agricultural land to the east of Valleyside is one of a number of sites that may qualify as a rural exception site and may be suitable for affordable housing, i.e. a village housing initiative or community led housing (in accordance TP3). However, the scheme will depend on local landowners making land available for such initiatives.</p> <p>Agreed. The special circumstances in the second part of TP4 have been deleted.</p>
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	<p>Policies TP8 & 9: New Economic Proposals & Expansion of Existing Businesses</p> <p>The plan evidences the desire to support the local economy and refers to new businesses and existing businesses. There is a need I believe, in the Policy statement itself (TP9), to emphasise the support to SUSTAIN (ie not just expand) local businesses.</p> <p>For example it is clear that the 2 existing permanent year-round retail businesses in Bantham are potentially at risk of failing due to the lack of dedicated customer parking spaces and in particular the pub's reliance on Bantham Estate's goodwill with regard to the nearest off-street parking. Such facilities are an essential part of Community life and every effort should be made to support them accordingly.</p> <p>It may be that the Plan is already regarded as being drafted so as to deal with eg any future proposal to provide for customer parking on the land opposite the Village Stores. However, the simple insertion of the words "maintenance and" before the word "expansion" in the first line of TP9 would, in my opinion, strengthen the policy statement.</p>	<p>Agreed. TP9 has been amended to refer to proposals "for the maintenance and expansion" of existing businesses.</p>
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	<p>Policy TP13: New marine-related workshops This policy states support for new marine related workshops and cross references to TP1. However, without any cross reference to TP2 or indeed clarifying that they would need to be sited on or close to the Avon estuary, isn't there a danger that such new workshops could be applied for on rural sites away from the estuary and that, as the Plan is drafted, Council would have to support said applications?</p> <p>Figure 15: Public Rights of Way Footpath 8 should be drawn correctly to show it continuing to the west of the road connecting Aunemouth Cross to West Buckland. I believe that this section which joins the lane to the main road down into Bantham is in fact a Green Lane which became overgrown but is now restored thanks to the efforts of a local resident.</p>	<p>Agreed. TP13 has been amended so that any new marine-related workshops must be located in or close to the Avon estuary.</p> <p>The path referred to is identified on the DCC PROW OS map 1:10,000 as Unsurfaced Unclassified County Road no 301. No change.</p>
<p>24. Mark Fairbrass</p>	<p>Figure 7 Although its hard to see on the settlement boundary plan, it appears the line is drawn through the middle of the land belonging to The Thatches and Seadrift and puts my garage outside the boundary.</p>	<p>The settlement boundary plan for Thurlestone has been drawn up by SHDC and accords with the emerging Joint Local Plan.</p>

<p>25. Alan Taylor Bigg</p>	<p>General The Plan accurately reflects many of my own views and those of neighbours with whom I have discussed the future of the Parish. I heartily endorse it</p> <p>Paragraph 2.19: Vision I am particularly concerned about the (long standing) age imbalance in the Parish. I would like to add "with a balanced age profile" after the word community in the vision.</p> <p>Policy TP6: Principal Residence Requirement This Policy may be the best chance to ensure that the Villages' communities are viable given the unhealthy level of unoccupied homes.</p> <p>Policy TP7: Replacement dwellings & extensions This is essential to prevent the current trend to supersizing replacement buildings. Such constructions damage the access roads, stretch infrastructure services such as water and sewage, inflict unacceptable disruption to neighbouring properties and are generally deleterious to the environment. Additionally, it is observable that the very large new houses stand unoccupied for long periods thus making little contribution to the community.</p>	<p>Endorsement of the Plan is welcomed.</p> <p>The demographic age imbalance is addressed in the Housing Objectives.</p> <p>Support for TP6 & TP7 is welcomed.</p>
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<p>26. Nick Wheldon</p>	<p>Policy TP25 – Car Park I am fully supportive of this neighbourhood plan with one exception. A new car park on a greenfield site in Bantham would be unwelcome. Large green areas of Bantham are already given over to car parking, and no more could be used for parking without serious impact on the local environment. There is already provision for very large numbers of cars during the day, and there is provision 24 hours a day for local residents and businesses.</p> <p>TP21- Non-designated heritage assets I am keen to keep the historic Bantham street scene unchanged for future generations to enjoy. It would also be desirable to keep the use of Coronation Quay boathouse for the storage, maintenance and building of boats.</p> <p>TP2 – Settlement Boundaries I am very strongly in favour of the proposed settlement boundaries.</p>	<p>Agreed. TP25 has been amended to refer only to Thurlestone.</p> <p>Support for the future protection of the Bantham street scene, and the use of Coronation Quay boathouse for the storage, maintenance and building of boats is welcomed.</p> <p>Support for TP2 is welcomed.</p>
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<p>27. Gill and David Stone</p>	<p>Congratulations on all your hard work. We now have a comprehensive and clear Neighbourhood Plan that reflects the wishes of the community and neighbourhood, which we hope will be respected by the various examiners and others who will pass judgement on it. Lots of hard work has gone into this and thanks to all the research and local interest, we have a good plan for our future.</p>	<p>Support for the Plan and endorsement that it reflects the wishes of the community is welcomed.</p>
<p>28. Gillian Marshall</p>	<p>Very impressed with the finished document and so appreciate the amount of work and detail that has gone into it which totally underlines the wishes of the Parish.</p>	<p>Support for the Plan and endorsement that it underlines the wishes of the parish is welcomed.</p>
<p>29. Joan Sparrow</p>	<p>The proposed plan is an excellent document, fully reflecting the way in which our parish should be both preserved and developed for the future. It strikes the right balance, aiming to keep the unique identity of this very special area and also to maintain a vibrant, living community. I fully support it and would encourage every other resident to do the same.</p>	<p>Support for the Plan and endorsement that it strikes the right balance is welcomed.</p>

<p>30. Catherine Delafield</p>	<p>Policy TP18: Recreation and Sport The section about care over development near the beaches needs to be as strong and clear as possible. Further erosion of a delicate landscape must be guarded against and there may be knock-on effects from other policies such as TP25 re car parking.</p> <p>Policy TP25: Car Park More car parking will bring more cars and the road system cannot cope. Policies might include a park and ride or walking from existing sites to avoid gridlock. A green site should not be taken up just because of the localised demands of the school run. This proposal needs to be reviewed or at least strengthened.</p> <p>Para 2.19 I would commend the vision statement as helpful and inclusive giving a way forward for this excellent document.</p> <p>Para 2.14 I have raised a concern about the need for some interface with the South Milton plan. This area impacts very much on the Thurlestone boundary and co-ordination would be beneficial to both parishes.</p>	<p>Support for the second part of TP18 is welcomed. (Note: this policy has been moved to TP22 – The Natural Environment, since it concerns the landscape.)</p> <p>TP25 has been amended so that it relates only to land within or adjoining Thurlestone to deal with localised school car parking issues and Parish Hall car park overflow.</p> <p>Support for the Plan and specifically the Vision statement is welcomed.</p> <p>Noted. No change.</p>
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<p>31. Declan Dwyer</p>	<p>My wife and I are very much in favour of your well thought out and professionally presented neighbourhood plan. It ensures that the essential character of our beautiful village and surrounding area should be preserved, while allowing limited building for full time local living.</p> <p>Policy TP6: Principal Residence Requirement Currently only 20 of the 83 properties on the Yarmer Estate are lived in all the year round. It is deserted during the winter. This second home epidemic has driven up the price of local houses, harmed economic development in the area and has over filled the place with holidaymaker strangers in the summer.</p>	<p>Support for the Plan is welcomed.</p> <p>Support for TP6 is welcomed.</p>
<p>32. M.J. Stickland</p>	<p>I have read through the whole of the draft document. I write to congratulate the authors on a magnificent document. Its thoroughness and its technical content will impress any inspector in the next part of the process.</p>	<p>Support for the Plan is welcomed.</p>

<p>33. David Houghton</p>	<p>Fully support the policies laid down in the Plan. Hope that proposed building developments currently being discussed will be rejected – as laid down in the Plan criteria. Would support more houses being built for younger families as permanent residents.</p>	<p>Support for the Plan is welcomed. The Housing Objectives address the case for building more houses for younger families as permanent families. No change.</p>
<p>34. John and Caroline Montague</p>	<p>Para 3.28: Support infill only housing</p> <p>Para 4.21 and TP11: Expansion of hotels and pubs impacts on congested road System</p> <p>TP17 – Footpaths & cycle tracks, TP18 Recreation & Sport, TP19 - Change of Use to OSSR & TP20 – Change Use from OSSR: Support TP22 – Non-designated heritage assets & TP23- Natural Environment: Agree</p> <p>TP9 – Business expansion and TP27 Community Wifi: Do not support</p>	<p>Noted. No change.</p> <p>Criterion VII in TP1 addresses traffic impact. No change</p> <p>Support for TP17 - TP20, TP22 and TP23 is welcomed.</p> <p>Noted. No change.</p>

<p>35. Stewart Barnes</p>	<p>Policy TP21: Non-Designated Heritage Assets Surprised that no mention is made of pill boxes as part of the heritage to be protected or preserved. Bantham - grid 6519 4415 is one site. The other overlooks Leasfoot Beach, but may be just outside the boundary? Suggest these warrant listing as part of our heritage and to be protected and preserved.</p>	<p>The WW2 pill box at Bantham, which is located underneath the Surf Lifesaving Club, is included in the designation of the Scheduled Ancient Monument and therefore has statutory protection. The pill box overlooking Leasfoot Beach is outside the Plan area.</p>
<p>36. Margaret Houghton</p>	<p>We were so impressed by the finished plan and congratulate the team and endorse the plan.</p>	<p>Endorsement of the Plan is welcomed.</p>
<p>37. Joan Gillan</p>	<p>An excellent presentation. I just hope it won't turn out to have been a waste of time. Also, that the "powers that be" will take note and implement it.</p>	<p>Support for the Plan and its implementation is welcomed.</p>
<p>38. Pat Gocher</p>	<p>Congratulations. A very impressive and informative plan. Any queries I had were answered by careful reading of it. When the Plan is eventually passed it would be good if copies were available for individuals to have (or buy). An interesting document for the future.</p>	<p>Support for the Plan is welcomed.</p>

<p>39. Carter Jonas on behalf of Bantham Estate</p>	<p>Paragraphs 1.1 - 1.15</p> <p>The Bantham Estate (“the Estate”) agrees with the statement at paragraph 1.5 in relation to the area’s special qualities and the need to strike a balance between encouraging the right type of future development and preserving the unspoilt, undeveloped character of the area.</p> <p>As the major landowner in the Parish, the Estate, has a major role to play in the local economy. This is on the basis that, as the Plan acknowledges at paragraph 1.15, the Estate owns/manages the beach and its car park, farm land and numerous properties, including the Grade II Listed cottages, as well as running the shoot.</p> <p>Against this background, we are surprised that the Plan:</p> <ul style="list-style-type: none"> a) does not recognise the Estate and/or its importance to the local economy; b) does not include policies that support the Estate’s need for long-term sustainability and self-sufficiency; c) does not include policies that relate specifically to the Estate and the role it can play delivering objectives of the Plan. <p>The Estate, would welcome further, detailed</p>	<p>The Plan’s policies relate to the Plan Area, irrespective of land ownership, and are based on over 2 years’ community engagement and consultation in the parish. This included 3 Steering Group meetings to which the owner of the Estate was invited and presented his draft proposals for the Estate, and a further 6 meetings which took place with members of the Local Economy, Housing and Wellbeing Working Party Groups. The factual information obtained in the course of these meetings has formed part of the evidence base of the Plan. The Plan’s policies address the sustainable development of the Plan Area as a whole. No change.</p>
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	<p>discussions with the Neighbourhood Plan Group in this regard before the next version of the Plan is produced.</p> <p>Paragraphs 2.1 - 2.19 The Bantham Estate’s view is that the Pre-Submission Consultation Draft Thurlestone Parish Neighbourhood Plan 2015-2034 could be regarded as premature in that it must be in general conformity with the Higher Order Local Plan, which, in this case, is the emerging Plymouth and South West Devon Joint Local Plan. That Plan has only recently been submitted to the Secretary of State and has not yet been the subject of an examination. Ideally, therefore, work on the Neighbourhood Plan should be put on hold until the Local Plan has been adopted, although this would less of concern for the Estate if the matters raised in its various responses to the draft Neighbourhood Plan can be addressed in the next version of the Plan.</p> <p>Figure 6: Objectives and Policy TP1 The Bantham Estate (“the Estate”) supports the broad objectives set out at Figure 6 in the Plan. It is, however, concerned that those broad objectives are not reflected in Policy TP1 –</p>	<p>There is no need for there to be an up-to-date Local Plan in order to make a neighbourhood plan. The law regarding prematurity and emerging local plans is well established.</p> <p>The relevant local plan for the purposes of testing the general conformity of neighbourhood plans to strategic policies is the current development plan, which in the case of South Hams District, this is the Local Development Framework, in particular, the 2006 Core Strategy.</p> <p>No change.</p> <p>Policy TP1 - General Development Principles sets out the overarching criteria applicable to all development proposals. Policies TP3-TP7 address the Housing</p>
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	<p>General Development Principles. In particular, the Estate is of the opinion that the General Development Principles set out at Policy TP1 should also include:</p> <p>a) a commitment to additional housing consistent with the Plan’s first objective; and b) support for existing businesses and the provision of new employment opportunities for local people, which is listed at the second objective.</p> <p>Paragraphs 2.26 - 2.29 and Policy TP2 There is an identified need for an appropriate amount of additional market and affordable housing in the Parish. Save in exceptional circumstances, the Neighbourhood Plan seeks to locate new housing within newly defined settlement boundaries for each of the three villages. The Bantham Estate (“the Estate”) is of the opinion that settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new</p>	<p>Objectives set out in Figure 6 and Policies TP8-TP16 address the Local Economy Objectives. No change.</p> <p>TP3 is a criteria-based policy which supports affordable housing where it can be demonstrated that there is a clearly identified need on either infill (including previously developed land) or a rural exception site. TP4 is a criteria-based policy which supports open market housing where it is of a size, type and tenure that reflects identified housing needs on infill. The purpose of Policy TP2 - Settlement Boundaries is to prevent encroachment into the countryside and provide clarity and certainty for the future development of the area. No change.</p>
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	<p>homes in edge of village locations which technically, might sit outside the arbitrary boundaries, as drawn.</p> <p>The Estate's view is that applications for small-scale housing development that are consistent with the overall objectives of the Plan should be considered on their merits.</p> <p>Against this background, the Estate's view is that figures 7, 8 and 9 should be removed from the Plan.</p> <p>Paragraphs 3.1 - 3.39 and Policy TP3, Policy TP4, Policy TP5 and Policy TP6</p> <p>The Neighbourhood Plan seeks to distinguish between open market and affordable housing. The Bantham Estate's ("the Estate") view is that the affordable housing should be broken down further to encompass both affordable and keyworker housing. The provision of keyworker housing may be an issue for the Estate: in order to retain and attract staff to manage the Estate and to support those functions that contribute towards the local economy, including tourism, the Estate may, in the future, need to be in a position to offer its employees keyworker housing on appropriate terms. The Estate would ask the Neighbourhood Plan Group to amend Policy</p>	<p>Our understanding is that the Estate owns 20 rental properties in Bantham, either long term rentals or rented to Estate workers. There are 47 affordable properties in the parish and there is the opportunity under the Plan to deliver a village house initiative and/or community led housing for which Estate workers may be eligible.</p> <p>No change.</p>
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	<p>TP3 – Affordable Housing accordingly by inserting references to keyworker housing alongside references to affordable housing.</p> <p>Policy TP4 – Open Market Housing: The Estate supports Policy TP4, as drafted. It would make the point, however, that seeking to accommodate “up to five dwellings” on individual plots within the built-up areas of the three principal settlements goes to the comments made by the Estate in relation to the appropriateness or otherwise of defined settlement boundaries.</p> <p>Policy TP5 The Estate can see why the Plan would seek to apply a ‘principal residence requirement’ in relation to one off applications for new development. However, in the context of the Estate’s need for long-term self-sufficiency/ sustainability, there may situations whereby in order to facilitate/bring forward viable development that is consistent with the main aims and objectives of the Plan, a more flexible approach is required. With regard to Policy TP5 iii, the Estate’s view is that a ‘principal residence requirement’ is unreasonable and unwarranted in so far as the</p>	<p>Noted. No change.</p> <p>This Plan supports a principal residence requirement in the case of all new open market dwellings, including converted farm and rural buildings. 39% of dwellings in the parish are already second homes and/or holiday lets. In Bantham, 58% of dwellings are second homes and/or second homes and only 2 properties are owner-occupied. Buildings that are empty for much of the year do not contribute to sustainable development and the community’s Vision of: <i>“A vibrant coastal and rural community....”</i></p>
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	<p>reuse of farm and rural buildings are concerned. This is on the basis that redundant farm buildings are often in less sustainable, more isolated locations or within existing farm complexes, which makes them better suited to less than year round occupation.</p> <p>Policy TP8, TP9, TP10, TP11, TP12, TP13, TP14, TP15 & TP16</p> <p>The Bantham Estate (“the Estate”) supports policies TP8 – TP16, all of which relate to the local economy.</p> <p>The Estate is however concerned that the Plan does not acknowledge the contribution that it makes to the local economy. In this regard, the Estate would welcome discussions with the Neighbourhood Plan Group about a bespoke policy for the Estate that would support:</p> <ul style="list-style-type: none"> - New multi-faceted Estate-related development (including development that facilitates/supports other objectives of the Plan such as rural diversification and employment-generating development, especially where it is consistent with the policy of encouraging year-round working; and/or the development of a new ‘business hub’, tourism-related development and proposals for recreation and sport (e.g. the golf club). 	<p>No change.</p> <p>Support for Policies TP8 – TP16 is welcomed.</p> <p>We note the Estate’s suggestion of a bespoke policy for the Estate, but (as stated above) the Plan’s policies relate to the Plan Area as a whole, irrespective of land ownership.</p> <p>No change.</p>
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	<ul style="list-style-type: none">- The re-use of redundant or under-used Estate buildings;- Key worker and affordable housing for Estate employees; and- Limited market housing as part of a multi-faceted approach to facilitating the Estate's need for long-term self-sufficiency/sustainability. <p>On the last of these points, the Estate notes that the chapter on 'wellbeing' includes a number of initiatives (e.g. improvements to/the provision of additional footpaths & cycle ways; new play facilities; new and improved sport and recreation provision) that are likely to affect or require Estate land and which are likely to require external funding.</p> <p>The Estate would welcome discussions with the Neighbourhood Plan Group about these initiatives and how it might work with the Parish Council to 'enable' some of these initiatives to be brought forward. That discussion could also be extended to include the Plan's aspirations to maintain/improve heritage assets, the local environment and community infrastructure.</p>	
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<p>40. South Hams District Council</p>	<p>Click on the following links for the LPA's full consultation response and attendance note of a meeting with NPSG representatives on 15 Nov 2017</p>	
<p>The Vision</p>	<p>The vision effectively gives an impression of what is seeking to be achieved. Specific mention of types of development may be better expressed within the stated Aims and Objectives under the relevant themes.</p>	<p>The Vision has been through two rounds of public consultation in the parish and was endorsed by 98% of respondents in the parish Questionnaire. No change.</p>
<p>Objectives</p>	<p>Wellbeing, Heritage, Environment and Resources Objectives - fully support these aims Housing Objective – This is broadly consistent with adopted and emerging local policies, as well as national guidance. It has always been difficult to use the planning system to intervene in how open market properties are procured, as the name suggests, the premise of restricting open market ownership is something of a contradiction in terms. There is an onus on any planning document to show how identified needs will be met, which will be examined when looking at the relevant policies. Local Economy Objective – The specific mention of providing new employment opportunities ‘for local people’ may be seeking to extend the remit of the neighbourhood plan beyond what is permitted. Infrastructure Objective – For the plan to deliver any meaningful infrastructure, it needs first to accept the</p>	<p>Support for the Wellbeing, Heritage, Environment and Resources Objectives is welcomed. Comments on the Housing Objective noted. No change. Agreed. The reference to “for young people” in the Local Economy Objective has been deleted. The level of infrastructure supported by the Plan (i.e. community WiFi, air ambulance night landing site and</p>

	premise of a reasonable amount of new development to generate funds for investment.	small car park) is likely to be funded by grants and/or the community, rather than needing to rely on developer contributions for delivery. No change.
Policy writing	Neighbourhood Plans are advised not to try and repeat local or national planning policy. The Thurlestone NP group needs to consider whether each policy is necessary for inclusion in future drafts of their plan. If policies remain that are already the subject of local and/or national policies, care needs to be taken to ensure consistency with existing policy to avoid ambiguity over interpretation in the decision-making process.	No specific examples have been provided, except for TP22 (see below) but the wording of the Plan policies has been checked for any inconsistencies.

POLICY TP1 – GENERAL DEVELOPMENT PRINCIPLES	Overarching set of criteria, designed to apply to all decision-making, with a focus on core planning principles. These are locally specific, and replicate elements of existing policies that have been adopted locally and nationally. The criteria relating to identifying and mitigating impacts relating to the AONB have been written in conjunction with the South Devon AONB Manager, and are considered to provide adequate protection to the designated landscape. This policy is cross-referenced in almost all other NP policies.	Noted. No change.
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POLICY TP2 – SETTLEMENT BOUNDARIES

Drawing boundaries around Bantham and Buckland is contrary to both the emerging JLP and adopted CS. Neither LPA document draws a boundary around Buckland or Bantham, as they are not considered to be sustainable locations for new development. This follows an extensive assessment of rural settlements using a sustainability toolkit. At an LPA level both Bantham and Buckland sit within sensitive landscapes, and as they do not have boundaries are considered to be in the countryside. They also sit within the Undeveloped Coast, and AONB, afforded the settlements the highest level of protection from inappropriate development. Whilst it is accepted that NPs have the option of identifying boundaries as a policy tool, the NP needs to do so in a way that is consistent with locally adopted policies. The CS and JLP use boundaries to show where specific policies will be applied (such as Undeveloped Coast). By trying to draw boundaries around settlements that are not identified in the CS or JLP as sustainable, ambiguity is created over where the Undeveloped Coast and Development in the Countryside policies should be applied. The principles for drawing the boundaries are also inconsistent with those used to inform the emerging JLP boundaries. The NP seeks to identify 'opportunity or infill sites' that 'round off' settlements within boundaries. In doing so, the NP is identifying sites for development. The process for identifying sites for development requires an assessment of all reasonable alternatives before identifying preferred sites. To use a line on a map to identify a development site, without a robust site selection process behind, it circumvents the appropriate process for site selection and does not represent sound plan making. It is agreed that there

Neighbourhood plans are entitled to designate settlement boundaries. Settlement boundaries add an extra layer of protection against inappropriate development and encroachment into the countryside by providing clarity and certainty for the future development of the area, rather than relying on adopted and emerging countryside policies whereby proposals are considered on a case-by-case basis on their merits. This is important given that the parish is subject to three landscape designations - AONB/Heritage Coast and Undeveloped Coast. The Housing and Settlement Boundary Topic Papers provide more detail. No change.

The criteria used for drawing the boundaries have been amended to exclude the 'rounding off' criteria, and are consistent with those applied in the emerging JLP and other settlement boundary reviews carried out elsewhere in the country.

	<p>should be no coalescence between identified settlements, but the use of boundaries in this way is not considered to be the correct tool to meet this aim. SHDC propose that the boundaries are removed, and allow the combination of adopted and emerging Development in the Countryside, Undeveloped Coast and Designated Landscapes policies to provide protection against inappropriate development in these locations. If the NP would like to identify new development sites in Bantham and/or Buckland, then a site allocations process should be followed, with justification for identifying sites in these locations. It is accepted that Bantham and Buckland do form a network of rural villages that look to Thurlestone for a limited level of services and amenities. However, given the distances between the settlements, and local topography, it is expected that most people will drive to Thurlestone by car, and as such it is not considered appropriate to label either Buckland or Bantham as ‘sustainable’.</p>	
<p>POLICY TP3 – AFFORDABLE HOUSING</p>	<p>Provides criteria which must be met in order to deliver affordable housing schemes. The policy preface identifies 2 specific types of housing that the plan is seeking to deliver, both of which identify local people on low or medium salaries as a specific need group. The NP also identifies infill plots as being preferable for development other than sites adjoining existing settlements. For the NP to rely upon plots within existing settlements, where land values are already elevated, to deliver affordable housing seems unrealistic, unless land owners altruistically suppress the value of their land to reduce the overall delivery costs of a new home. The NP also seems to place an</p>	<p>TP3 supports affordable housing on either infill or rural exception sites to meet identified local housing need. No preference for infill is expressed in the policy.</p> <p>Given limited infill available and high land prices, community-led housing is seen as a valuable opportunity to provide 1 or 2 small-scale sites for young working people on land in the parish that might not otherwise be allocated for housing, or which is unlikely to be of interest to mainstream housebuilders.</p> <p>The Plan is not required to identify and allocate a site, but there are local families interested in</p>

	<p>over-reliance on community-led housing to deliver affordable housing schemes, without any evidence of a Community Land Trust existing in the NP area or actively looking for a site. To be able to demonstrate that the identified short-term affordable housing need of 5 dwellings can be met, the NP should consider identifying a CLT/Community-led housing site. This will give greater certainty of delivery, and reduce the burden and risk on community groups by not relying on the groups themselves to identify and purchase a site. Para 3.38 says that most of the land adjoining settlements in the NP area is grade 3, and only the provision of affordable housing would justify the loss of productive agricultural land. Adopted and emerging Development in the Countryside policies require just that, and could be used to deliver Affordable Housing on sites adjoining exiting settlements. By not considering the merits of sites adjoining existing settlements the NP cannot be considered to be applying the presumption in favour of sustainable development as required by the NPPF – which does apply even in the AONB, as long as the proposal is not considered to be ‘major’, and the requirements of the CRoW Act are fully met. The NP are encouraged to reconsider their approach to sites adjoining existing settlements. The NP could meet its aims for delivering community-led, affordable housing by allocating a site for that use and delivery on a specified site.</p>	<p>progressing this initiative and there are a number of possible sites that may be suitable. This initiative is currently being progressed with the Council’s housing officers.</p> <p><i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP4 – OPEN MARKET HOUSING</p>	<p>It is useful to provide specific guidance that can enable the delivery of new housing. The requirement for small- scale schemes is consistent with other elements of the plan, although this does not provide any indication of overall quantity of housing that</p>	<p>The overall quantity of market housing is determined by the amount of infill (including previously developed land) available in each settlement. In the case of a village housing initiative, the quantity would depend on the number of houses needed to</p>

	<p>could be delivered through this route. The mention of the allotment site in Bantham gives credibility to the suspicion that this site is being promoted as a site for development, but without having gone through a rigorous and transparent site selection process.</p> <p>The wording of criteria 2 imposes overly restrictive criteria on sites that could be considered sustainable. The criteria reflects the restrictions applied in previously adopted 'development in the countryside' policies that are no longer applied by the LPA as they are not considered to be NPPF compliant, on the basis that such restriction do not reflect the presumption in favour.</p> <p>The emerging JLP policy position regarding development in the countryside is considered to be more aligned to the NPPF presumption in favour of sustainable development.</p>	<p>cross-subsidise the affordable housing. Criterion iii of the first part of TP4 has been deleted. The second part of TP4 has also been amended to exclude the 'special circumstances' that allow open market housing in the countryside, given the location of the parish within 3 landscape designations and on the basis of responses to this consultation from the community.</p> <p><i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP5 – REUSE OF FARM AND RURAL BUILDINGS</p>	<p>Provides a criteria-based framework to enable reuse of agricultural buildings for residential purposes. Refers back to policy TP1, but nowhere is it required that the location of new homes are required to be in a demonstrably sustainable location. There is a risk of applying this policy and enabling new isolated homes in the countryside, which is contrary to adopted and emerging local policy and national planning guidance.</p>	<p>The adopted and emerging local plan and NPPF all have criteria-based policies that allow reuse of redundant buildings in the countryside for residential uses. No change.</p> <p><i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>

<p>POLICY TP6 – PRINCIPAL RESIDENCE REQUIREMENT</p>	<p>Policy requiring all new homes to be occupied as a principal residence. The aims of this policy are understood, and the social benefits of providing more homes for local people are understood. However, the evidence provided only partly justifies the policy, and reference made to the similar St Ives NP policy only identifies part of the issue. The justification for the St Ives policy allied the number/proportion of second homes with average house prices and local wages. Given the reliance on infill plots in this plan, it may also be pertinent to look at the cost of building plots too. Once all of these component pieces of evidence are prepared, the issue of affordability and accessibility of housing will be better understood, and therefore providing more robust justification of the policy.</p>	<p>Noted. Detailed evidence is produced in the Housing Topic Paper, including average house prices and cost of building plots. No change.</p>
<p>POLICY TP7 – REPLACEMENT DWELLINGS AND EXTENSIONS</p>	<p>Criteria for replacement of dwellings and extensions... The application of this policy in identified sustainable settlements is considered overly restrictive, and not in conformity with the presumption in favour of sustainable development. The provisions of TP1 and adopted and emerging residential amenity policies should be engaged to ensure inappropriate subdivision of plots does not take place.</p> <p>There are however instances when the division of plots or redevelopment of large buildings where the addition of new homes provides a more appropriate housing mix and/or a better use of the site. SHDC proposes that this policy is only applied in the countryside, as consistent with the emerging JLP policy position and national planning guidance.</p>	<p>TP7 was supported by 94% of respondents and seeks to address a particular local issue. This policy has been amended to apply only to Thurlestone in order to protect visual amenity and retain a reasonable proportion of bungalows, which are ideally suited to the needs of older people and people wishing to downsize: in 2011, 47% of the population of the parish was aged 60+. The policy has also been amended to ensure inappropriate subdivision of plots does not take place.</p> <p><i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>

<p>HOUSING FOR OLDER PEOPLE</p>	<p>The analysis of the issue is well constructed and relevant. Did the NP consider having a policy specifically aimed at delivering more housing for older age groups? Could a site be identified for that purpose?</p>	<p>Specialist adaptable housing for older people offered by developers such as Blue Cedar Homes was considered not to be viable or deliverable in the parish. No change.</p>
<p>POLICY TP8 – ECONOMIC DEVELOPMENT</p>	<p>This enabling policy is encouraging, and supported in its aims. The policy seeks to enable greater flexibility in working practices, which is recognised as being much needed in rural areas. The policy is supported.</p>	<p>Support for TP8 is welcomed.</p>
<p>POLICY TP9 – EXPANSION OF EXISTING BUSINESSES</p>	<p>Existing business expansion is something that should be encouraged, providing that the business is located in an appropriate location in the first place! In order to compliment policy TP8, should B-class uses not also be encouraged to expand, as long as the requirements of TP1 are met? This would be more consistent with other economy-related policies in the NP?</p>	<p>TP9 has been amended so that it relates to tourism-related businesses. B Class Uses are considered too wide. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP10 – NEW BUSINESSES</p>	<p>Another enabling policy is to be supported, although the policy is too prescriptive in the types of businesses it aims to deliver – the use classes order does not differentiate between specific types of A1 use for example, and so policy cannot ensure that other businesses in the same use class could be resisted. The location of the parish, and known users, are likely to dictate which types of businesses are created – surf/water sports shops for example, rather than shoe shops or furniture stores.</p>	<p>TP10 has been amended so that it relates to tourism-related businesses. B Class Uses are considered too wide. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>

<p>POLICY TP11 – CARAVAN, CAMPSITES AND CHALET SITES</p>	<p>Additional guidance on this type of use is helpful, particularly within the AONB and Undeveloped Coast. However, this presupposes that an existing site is already in an acceptable location, and that a better location cannot be used for caravanning or camping. Possibly consider the relocation of existing sites if it can be demonstrated that the new location is more sustainable and less visually obtrusive?</p>	<p>The community has not raised any concerns or objections about the location of any existing caravan or campsites. No change. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP12 – NEW BUSINESS HUB</p>	<p>It is not clear what the policy is expecting to deliver – possibly a large, multi-use building, seemingly not restricted to a location within an existing settlement? This is seemingly not restricted by use. SHDC preference would be for a site to be identified and allocated for this purpose.</p>	<p>TP12 has been amended to make it clear what the policy is expecting to deliver: a large, multi-use building would not qualify. The hub may occupy a former farm or rural building (TP15), but is subject to TP1, and the requirements of criteria I & II. The Plan is not required to identify and allocate a site. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP13 – NEW MARINE-RELATED WORKSHOPS</p>	<p>The importance of the coast and marine related industry is not to be undervalued, but it is unclear how viable new marine businesses will be on a watercourse as limited in scale as the River Avon. Larger maritime settlements such as Salcombe and Dartmouth are struggling to sustain their own marine industries, and they benefit from more efficient supply chains and larger pools of employees. Community aspirations may not be entirely consistent with market forces. Some evidence of latent demand would provide helpful justification for this policy.</p>	<p>TP13 has been amended so that any new marine-related workshops would be confined to sites on or close to the Avon Estuary. Boat building is a traditional local industry – Bantam boats – and the existing boat repair and maintenance facilities at Coronation Quay are a valuable facility for local boat owners who would otherwise have to travel out of the parish. The Local Economy Topic Paper provides more detail. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>

<p>POLICY TP14 – STORAGE SPACE</p>	<p>Storage uses fall within the use class B8, and this would not normally be encouraged in rural or visually sensitive areas. B8 also includes ‘Wholesale warehouses, distribution centres and repositories’. There is also permitted development rights from B8 to C3 dwelling houses. The potential implications of supporting more storage uses should be considered carefully before including in the final draft of the plan.</p>	<p>TP14 seeks to address a particular local issue and is subject to TP1. PD rights for change of use from B8 to C3 dwellinghouses (Class P) do not apply in the AONB. No change <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP15 – CHANGE OF USE OF FARM AND RURAL BUILDINGS</p>	<p>The aims of the policy are understood, although it seems potentially too permissive to offer support to all new business uses regardless of use class or location of the farm buildings. Possibly restrict to specific identified uses?</p>	<p>The adopted and emerging local plan and NPPF all have criteria-based policies that allow reuse of redundant buildings in the countryside for commercial uses. No change. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP16 – RETENTION OF EMPLOYMENT USES</p>	<p>The first part of the policy could be used to justify loss of employment to residential – particularly if it is meeting a local need. Is that what was intended? It seems to be slightly inconsistent with the preceding policies.</p> <p>The second part of the policy isn’t about retaining employment uses at all, and should be the subject of its own policy, as it sets criteria applicable to proposals for the loss of employment uses, rather than retention.</p> <p>The Devon covenant is typically used to restrict the resale of ex-local authority homes. It is not considered the most appropriate mechanism for delivering affordable housing. SHDC will consider alternative mechanisms and work with NP group on this issue.</p>	<p>Agreed. TP16 has been renamed: Loss of Employment and Tourism-related Uses. The reference in the second part of the policy to occupancy criteria (Local Connection and Devon Covenant) has been deleted.</p>

<p>POLICY TP17 – FOOTPATHS AND CYCLE TRACKS</p>	<p>New walking and cycling infrastructure brings with it clear benefits, and this policy is supported. However, the creation of new infrastructure has the potential for environmental harm, and at present this policy is one of the few that does not refer back to TP1. SHDC suggests that this policy is cross-referenced with TP1 to ensure that the potential impacts of such development is understood and mitigated against.</p>	<p>Agreed. This policy has been cross-referenced with TP1.</p>
<p>POLICY TP18 – RECREATION AND SPORT</p>	<p>Facilities for children of all ages to play and recreate are encouraged. Prior to the creation of new facilities, management structures should be carefully examined and put into place. Investment in such facilities often comes from developer contributions, and it is not considered that this plan identifies new growth at a sufficient scale to generate the required levels of investment.</p> <p>The need for new grass pitches should be coordinated with Sport England, who have a good understanding of sports clubs and facilities across the LPA area.</p> <p>SHDC considers that policy 18(2) is not required in addition to policy TP23.</p>	<p>There was support for a level sports pitch in Thurlestone, but only small numbers were involved, so not a priority aim and does not warrant seeking developer contributions. However, if land and grant funds should become available for such a proposal, then this Plan supports it.</p> <p>The second part of TP18 has been moved to TP23 since it relates to the Natural Environment. Justification for the policy is dealt with under TP23.</p> <p><i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP19 – CHANGE OF USE TO OPEN SPACE, SPORT OR RECREATION</p>	<p>The health and social benefits of increasing OSSR provision is acknowledged. The policy says nothing about mitigating for the loss of biodiversity or habitats as a result of development.</p>	<p>Agreed. TP19 has been amended to include a criterion about mitigating for the loss of biodiversity or habitats as a result of the development.</p>
<p>POLICY TP20 – CHANGE OF USE FROM OPEN SPACE, SPORT AND RECREATION TO OTHER USES</p>	<p>Needs to be cross-referenced with Sport England guidance on loss of facilities.</p>	<p>Agreed. The supporting text has been amended to cross-reference with the Sports England Guidance.</p>

<p>POLICY TP21 – NON-DESIGNATED HERITAGE ASSETS</p>	<p>The implementation of this policy will require professional input from decision makers within the LPA.</p>	<p>The LPA’s heritage specialist is supportive and his comments are welcomed. No change.</p>
<p>POLICY TP22 – THE NATURAL ENVIRONMENT</p>	<p>The sensitivity of the natural landscape throughout the NP area is acknowledged. This is reflected in the existing local and national policies that apply to the vast majority of the plan area. The NP should consider whether it is appropriate to include a policy that is so well covered by other statutory documents. If the policy remains, care should be taken that terminology is consistent with all relevant documents, and does not use language that creates ambiguity or uncertainty in decision making.</p>	<p>Natural England and RSPB have endorsed this policy. No change. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP23 – COASTAL MANAGEMENT</p>	<p>The aims of the policy are understood. The policy needs to be cross-referenced with the current Shoreline Management Plan for the area to ensure compatibility.</p>	<p>The supporting text has been amended to cross-reference with the current Shoreline Management Plan, which is in our evidence base. TP23 now includes the second part of the original TP18 which protects the beaches and their immediate vicinity from inappropriate development. This policy is of particular local importance, given the location of the beaches within 3 landscape designations and, in the case of Bantham, a Scheduled Ancient Monument. The community values its unspoilt beaches – as do its visitors. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>

<p>POLICY TP24 – COMMUNITY WIFI</p>	<p>(Online draft version has this policy numbered as TP27?) Local and national policies already exist that relate to telecommunications infrastructure. SHDC suggests that NPPF and local policies are referred to before including this policy in future iterations of the NP.</p>	<p>NPPF and local policies are referred to on page 86 of the Pre-submission Consultation Draft plan. TP24 is aimed at small-scale parish requirements. No change. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP25 – CAR PARK</p>	<p>This is a permissive policy that enables change of use from agricultural or amenity land to car parking. This is not restricted to within or adjoining settlements. It seems a little incongruous that the NP says that agricultural land is too valuable to be used for anything other than affordable housing, but the permanent loss of such land for car-parking – of any scale – is considered acceptable? There is no limit on scale or number of fields that could reasonably be lost to car parking. For more clarity it is considered more appropriate for the NP to identify and allocate a site for this use. The use of a field as a car park can fall under the 28-day rule, and need not require the physical development of the site.</p>	<p>Agreed. TP4 has been amended so that it only applies to land within or adjoining Thurlestone and is limited to 20 parking spaces. This policy is a response to a local issue (school parking and parish hall overflow) and if land should become available, then the Plan supports it. The Plan is not required to identify and allocate a site. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP26 – AIR AMBULANCE NIGHT LANDING SITE</p>	<p>As above. If a site is needed, then the plan should allocate a site that use. It is questionable that such a resource is needed, does ‘permanent’ mean hardstanding, and presumably includes lighting? The land will not be utilised for the defined use for the vast majority of the time. Better to find an existing site that could be adapted for that use at short notice – Parish Hall car park for example. Otherwise there is the potential for environmental harm from this policy.</p>	<p>Devon Air Ambulance Trust has selected a preferred site on land adjoining Thurlestone. Hardstanding is not required. The landing site would have a grass surface and would be subject to TP1, so as to address any potential environmental harm. The Parish Hall car park is not suitable as it is used for evening functions and closely surrounded by built development. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>

<p>POLICY TP27 – SOLAR PANELS AND ARRAYS</p>	<p>The policy may usefully define how ‘close’ to a farm building is going to be assessed? Otherwise the policy is broadly consistent with local policy and national guidance.</p>	<p>The term ‘close’ in TP27 is the term used in the South Devon AONB Guidance and is not defined, but the second part of TP27 has been amended to make it clear that, by contrast, solar arrays on open farmland will not be supported.</p>
<p>POLICY TP28 – WIND TURBINES</p>	<p>If a site doesn’t fall within PD rights, turbines can only come forward on sites allocated by NPs or Local Plans. As such this policy is surplus to requirements, as clearly no sites are being allocated for that use.</p>	<p>TP28 is included to provide certainty, given the location of the parish within 3 landscape designations. <i>Position agreed by LPA on 15 Nov 2017 – see attendance note</i></p>
<p>POLICY TP29 – COMMUNITY HEATING</p>	<p>This policy is consistent with local policy and national guidance.</p>	<p>Noted. No change.</p>

<p>Additional comments</p>	<p>The Thurlestone Neighbourhood Plan seeks to closely manage development within a sensitive landscape, whilst enabling small-scale organic development that meets the priorities and needs of the local community first. The broad aspirations of the plan are consistent with adopted and emerging local policy.</p> <p>It is acknowledged that the emerging neighbourhood plan has been subject to a ‘health check’, and subject to some proposed amendments has been considered ‘sound’. As described in the introduction, there could be a difference between a ‘sound’ plan, and a plan that can be applied alongside locally adopted policies in a complimentary manner to maximum positive effect. For the most part, this consultation response poses questions or proposes amendments that are</p>	<p>The NPIERS ‘Healthcheck’ confirms that the policies in the Plan (subject to some amendments that were incorporated in the Pre-Submission Consultation Draft Plan) meet the requirements of the Basic Conditions, including, the requirement to have regard to national policy and to be in general conformity with the strategic policies in the adopted development plan. The term ‘sound’ does not apply to neighbourhood plans.</p> <p>The remaining comments raised by the LPA have already been addressed in the above responses, following positive and constructive discussions with the LPA officer on 15 Nov 2017.</p>
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designed to make a positive contribution to the next iteration of the neighbourhood plan. The outcome of these deliberations are unlikely to determine whether the plan meets the required basic conditions, where conformity with local and national policy is questioned.

There are two policies that at present are considered to conflict with both adopted and emerging policy and national guidance to such a degree that the plan is not considered to meet the basic conditions. These policies relate to the settlement boundaries drawn around Bantham and Buckland (TP2) – and the proposed use that these boundaries are designed to serve, and the replacement dwelling policy (TP7).

Some concern is also raised over the reliance on community-led housing schemes to deliver the identified affordable housing need. Reference is made to funding that is being held by SHDC at this present time for the delivery of community-led housing. There is no guarantee that any of this will be spent in the parish of Thurlestone, and no expectation that the funding will be used to procure sites on behalf of community groups.

The Housing Needs Survey provides a limited snapshot of need, and has a limited relevance of 3-5 years. Like all statutory DPD, review and monitoring of the effectiveness of the plan will be required. Under-delivery of affordable housing to meet an identified housing need could result in proposals on unallocated sites being approved. SHDC encourages neighbourhood plans to identify and allocate sites

	<p>for specific uses to provide certainty of delivery, providing that the requisite allocations processes are followed. It should also be noted that newly arising need is required to be factored into a review cycle of this neighbourhood plan.</p> <p>The plan is well-written and comprehensively researched. SHDC considers that the draft Thurlestone neighbourhood plan can be brought into compliance with local policy and national guidance subject to the advice and guidance provided being followed.</p>	
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