

<b>Comments</b>	<b>PS response</b>	<b>Action</b>
Para 3.13...The OSSR identifies existing facilities as well as informing future investment. I understand that the Churchstow Parish is looking to produce an OSSR for consistency with other the Parishes I suggest a meeting with the relevant South Hams' officer to discuss this and other aspects of the NP would be useful. I can facilitate a meeting.	Suggest amending text to state that Churchstow and WA OSSR plans are being developed .wait till during Reg 14 otherwise will delay the process	WA and C PC PS changed text
Para 5.8.5 All of the facilities listed are in Kingsbridge apart from WA Cricket Ground. Are there any other aspirations in WA or Churchstow? We are aware there is a need to refurbish WA Village Hall.	Update list, however most are in Kingsbridge	PS
KWAC Env1.....No comments		
KWAC Env2....1) My attention has been drawn to the play area and green space in WA between the village hall and school which have been omitted. Is there a reason for this?	Check with WA PC site can be added back	WA PC
2) For consistency with Kingsbridge should the churchyards at WA and Churchstow be included.	Can do,check if supported at WA and C	PS / WA / C
3) Figure 17a needs to be clearer so sites can be identified.	Will update Figure	PS/ S&J K
4) I have concerns regarding small spaces identified on the Churchstow Plan ( Figure 17c). from my experience such small spaces and what appears to be highway verges are not appropriate as LGS.	Agree being modified	C PC/ RS /PS / S & J K
5) My attention has been drawn to the potential to develop a Hub Facility in Kingsbridge Recreation Ground( KLGS2). Identification of the site as an LGS could potentially compromise this aspiration. I suggest this is discussed with the relevant South Hams' officers.	What is in the hub? May need to qualify the designation	RS / KTC
6) Rack Park (KLGS3) suggest access road is excluded from this designation.	Agree	RS/ S&J K
7) See comments on KWAC Env9 in terms of Trebble Park (KLGS6). I understand there are proposals for a MUGA/Skateboard Park on this site. The designation could compromise these aspirations.	Should not affect the designation but should qualify the text	RS

8) Bowcombe Amenity Space (KLS7). There are aspirations for small scale improvements in the OSSR. These could be compromised by this designation.	Don't agree but we should qualify the text	RS/PS
9) Brittons Field (KLS8). I am awaiting comments on this proposed designation.	Not clear	No action
10) NB Homelands (KLS12) is no longer a play area.	Check	RS PS removed reference to play area in plan text
11) Embankment Gardens (KLS16) Clarity regarding the exact location/boundaries of this designation is required.	Update mapping	S& J K / RS
<b>I WOULD SUGGEST A MEETING IS HELD WITH RELEVANT OFFICER'S OF THE COUNCIL TO DISCUSS THE ISSUES RAISED ABOVE.</b>	Should be held during Reg 14 and inform further SHDC comments/ plan at Reg 15	NPG/KTC/SHDC
KWAC Env3.... 1)The opening sentence needs refining.....in particular the last section of that sentence....." <i>must. demonstrate, where necessary due to the size and scale of the development;</i> "	Agree and will edit text	PS
2) I would suggest that the justification to this Policy references the JLP Biodiversity Network Creation Process (document enclosed)	Will do	PS
KWAC Env4....It will be necessary to include the views on a Proposals Map in the body of the NP. The viewpoints should also be identified in the body of the Policy. The NP identifies a substantial number of views 22 for Kingsbridge, West Alvington 8 and Churchstow 9. The purpose of this Policy is to protect key views. Identifying so many views could dilute the effectiveness of this Policy. I would suggest a review is undertaken with this in mind.	39 views for 3 parishes is not unreasonable. I agree that it would be beneficial to include the views in the Plan, but this will involve a significant amount of work	PS /RS/ S & J K
KWAC Env5....No comment.		
KWAC Env6....I would suggest the EA are specifically requested to comment on this Policy. Their comments should come forward as part of the Reg 14 consultation.	EA will do as part of Reg 14. Wording is on similar lines to previously examined plans	No action

<p>KWAC Env7....Suggest second sentence (re Devon Carbon Plan) is amended to remove “must”. Emphasis rather to encourage reference to the Devon Carbon Plan.</p>	<p>Change ‘must’ to ‘should’</p>	<p>PS</p>
<p>KWAC Env8....No comment.</p>		
<p>KWAC Env9..Is there any background evidence available to support the statements made in para 5.3.9. I note that Trebble Park is identified as a Local Green Space.....be careful this could restrict potential improvement to this allotment site.</p>	<p>Only anecdotal thus far will need a statement from KTC and WAPC</p>	<p>KTC/WAPC</p>
<p>KWAC Env10....This policy requests submission of a Tree Survey. The DM Local List determines what information should accompany a planning application. This need not be repeated in this Policy.</p>	<p>Text to be amended to remove the need for tree survey</p>	<p>PS</p>
<p>KWAC H1....Amongst other comments Cassandra Harrison has commented as follows on this Policy:-</p>		
<p>1) Criterion e) have you got evidence to submit to show that 50% discount on First Homes is viable? The advice from Locality was that NP groups should not set the discount, this is something for the LPA to do. All you can really say is discounts should ensure First Homes prices are affordable to local incomes, subject to exploring this with the LPA.</p>	<p>Yes, evidence provided in the Draft Housing Needs Survey (HNS) by AECOM and to be included in the Appendix. The HNS goes beyond the current work of SHDC</p>	<p>No change for Reg 14</p>
<p>2) Criterion f) this local connection is different to what is in the Council's adopted Local Allocation Policy, see attached page para 5.14. You can't set different local connection criteria as it is not compliant with Housing legislation.</p>	<p>Issue has been commented on by AECOM we hope that the LPA can support this approach</p>	<p>PS continue discussions with AECOM</p>
<p>I would add that the Policy in parts repeats JLP Policy and is somewhat complicated. I suggest the Group look at Policies in other NPs that have successfully navigated the Examination process for potential approaches to simplifying the content..</p>	<p>Do not agree that the policy is complicated , the current draft follows the lines of other made or examined plans e.g. Salcombe and South Huish and guidance from Locality</p>	<p>No change for Reg 14</p>

<p>KWAC H2...I have concerns about the statement in the first part of this sentence that market homes will only be supported where they cross subsidise an affordable housing. The JLP and SDP set out the requirements that any housing scheme should meet in terms of affordable housing. This need not be repeated. If you are seeking to exceed JLP or SDP requirements then this needs to be fully evidenced.</p>	<p>This policy is similar to the to the Made version of the Salcombe Plan on the subject . There is strong evidence for this approach in the HNS. With a focus on affordable housing.</p>	<p>No change for Reg 14</p>
<p>KWAC H3...This Policy repeats JLP Policy so need not be included.</p>	<p>Do not agree JLP policy is less explicit in TTV 27. Similar wording has passed examination at South Huish and Salcombe</p>	<p>No change for Reg14</p>
<p>KWAC H4...I would need to have access to the evidence base to comment.</p>	<p>Evidence is included in the HNS which can be viewed at Reg 14</p>	<p>No change for Reg 14</p>
<p>KWAC Em1....I have already, in correspondence regarding KWAC BE1, drawn attention to the mismatch between the Policies cited here.</p>	<p>Text amended</p>	<p>PS</p>
<p>KWAC Em2....I am concerned that redlining this area in a Plan that will become part of the Development Plan could result in undesirable consequences. For example the selling and buying of land may be unduly affected (the proposed designation will appear on land searches). The Roger Tym Study is dated. The preparation of a Development Brief for this area should be based on up to date research alongside robust and full consultation with landowners tenants and employees. The Development Brief that has been produced sets out good approaches to achieving the latter goal and good ideas for future development/redevelopment of the area. I suggest these need to be fully worked through with stakeholders in advance of any designation in the NP.</p>	<p>Do not agree, the concept is not new in fact there was a policy in the 1989-2001 Local Plan but has since been discarded by the LPA. There is local support for this approach Development Brief makes clear a way forward.</p>	<p>No change for Reg 14</p>
<p>KWAC EM3...I would suggest this policy is reviewed in the light of the Government's changes to the Use Classes Order</p>	<p>Use class E is stated in the Development Brief It is</p>	<p>No change for Reg 14</p>

	not clear what review is needed. The recently published revision to the Permitted Development Rights from E to Residential may have an impact but this is addressed in the brief whilst still supporting the central shopping area. We. Will await any review of the SPD in this regard	
KWAC EM4...No comment.		
KWAC EM5...No comment.		
KWAC EM6...No comment.		
KWAC BE1...I have already commented in detail on this Policy.	Text amended to address earlier comments and advice from AECOM	PS text amended
KWAC BE2.... The Policy and Design Brief proposed for Kingsbridge Quay differs from the JLP Policy TTV10 in that it introduces elements, for example the retention of like for like car parking, that could undermine the possibility of achieving a viable scheme on this site. I would suggest that, in the first instance, a meeting is convened with relevant officers of South Hams Council to discuss the content of this Policy and the Brief.	Noted however the policy develops and expands on TTV10 so we see no contradiction. Suggest a meeting is held during Reg 14 to inform SHDC's response.	No change for Reg 14
KWAC BE3....There is no need to repeat requirements that are already specified in the JLP and SPD. Section 2 of this Policy (regarding subdivision) I believe would be better served as stand-alone Policy. I would suggest that an evidence base for this new policy is produced based on issues that have arisen i.e. cases where subdivision has been detrimental.	This policy goes beyond the JLP and once made would have greater weight than the SPD. Point noted on separating section 2.However a similar policy combining the	No change for Reg 14

	requirements has passed examination at South Huish	
KWAC BE4....This Policy need not repeat the Policy protection afforded to Designated Heritage Assets which already enjoy adequate protection from these Policies.	Noted however it is felt that development that impacts on DHAs also needs further consideration. The policy text follows similar lines to South Huish which has passed examination	No change for Reg 14
KWAC T1....		
1) For information Public Footpaths cannot be used by cyclists.	Text modified to support cycleways only where permitted	PS
2) I would suggest this Policy is fully discussed with relevant South Hams' officers. I can provide contact details. My attention has been drawn to potential inconsistencies in the content and concerns at not being able to fully comment on the suggested routes without access to a proposals plan.	With the exception of the Churchstow to Kingsbridge routes, proposal plans are not available including the Primrose Trail. Many are the subject of long standing discussions with the landowners and adjoining parishes. There is a risk that the examiner may deem the policy more an aspiration however similar policies have previously passed examination (Salcombe, South Huish, Ogwell) The Town and Parish Council	No change for Reg 14

	would welcome help from officers to confirm the routes and suggest this is held during Reg 14.	
KWAC T2...I have commented on Policy KWAC BE2, I would suggest this proposal is added to the discussion with relevant South Hams officers as indicated.	See comments on BE2. The town council / community have been unable to identify a site for the fuel hub	No change for Reg 14. Continue discussions with SHDC, KTC/ NPG
KWAC T3....Criterion b) is overly restrictive? Criterion g): I am presuming the land proposed for the car park is in public control?....If not has the owner been consulted.	Noted however the policy reflects the community's wishes.	No change for Reg 14
KWAC T4....Has the Highway's Authority, Devon County Council, been consulted. This sort of Policy is not normally acceptable to Examiners since it is not land use based. I suggest the proposals included in this Policy are transferred to the general text as Community Actions.	We will await the advice on the Examiner on this and if necessary change to a community aspiration. A similar policy did pass examination at Kenton (nr Exeter. There have been ongoing dialogue with DCC/ HA on the issues at West Alvington and Churchstow	No change for Reg 14
KWAC HW1....I would suggest "permitted" is replace with "supported" in the second para of this Policy.	Agreed, text changed	PS text changed
KWAC HW2....No comment. I would suggest however that the first paragraph of this Policy is discussed with relevant South Hams' officers to ensure this aligns with the Council's approach.	Noted however similar text has passed examination at Salcombe	No change for Reg 14, ongoing discussion with SHDC
KWAC HW2....Suggest that since a choice on sites has not been finalised the last para of this Policy is moved to para 5.8.6. It can be stated in the justification.	Agreed, text moved	PS text moved