

## Summary of response to DNPA's Local Plan Review Modifications Consultation Examination Document ED56

This document sets out a summary of the Representations the Authority received during the Local Plan Proposed Modifications consultation (7 June – 19 July 2021). The summary is structured by section and provides a description of the Authority's response to the issues raised. Where the Authority's response proposes an action, this is set out in the Proposed Modifications.

This is a Summary Report; where a Representation requests specific detailed changes these are not included here, but may be viewed in the full Report of Representations. This full Report shows all Representations received during the modifications consultation and the Authority's response to each. Both reports are submitted to the Planning Inspectorate as part of the examination of the Local Plan.

*Table 1. Summary of Representations and Authority response*

Main Modification	Summary of comments	Comments by	DNPA response
<b>MM03</b>			
<b>Section 1.2, The Vision</b>	Support	Environment Agency (0058)	
<b>Section 1.2</b>	Concern the presumption in favour of sustainable development erodes NP purposes and local decision making	Buckfastleigh Town Council (0048)	This amendment avoids repetition of national policy DNPA are required to comply with. It does not in itself undermine local decision making, and supports Local Plan policy.
<b>MM05</b>			
<b>Paragraph 1.3.1</b>	Concern removal of 'indicative housing delivery figure' amounts to a housing target	Buckfastleigh Town Council (0048)	This amendment was considered necessary to align the Plan with the NPPF, better reflect precedent in the policies of other National Parks, and to give greater confidence in the delivery housing to meet local needs.
<b>MM06</b>			
<b>Paragraph 1.5.5</b>	Concern a qualitative threshold for major development is not appropriate.	Buckfastleigh Town Council (0048)	National policy sets the definition for major development in National Parks. A fixed definition could needlessly constrain necessary development.
<b>MM08</b>			
<b>Paragraph 1.6.12</b>	Support	Buckfastleigh Town Council (0048)	
<b>MM11</b>			
<b>Environment Strategy</b>	Amend proposed wording to include statement of intent to deliver outcomes for heritage at risk	Historic England (0220)	Modification proposed to respond to this and paragraph 3.1 in Inspector's post-hearing note.
<b>MM12</b>			
<b>Paragraph 2.3.16</b>	Support	Environment Agency	

		(0058)	
<b>Paragraph 2.3.18</b>	Support	Natural England (0046) Buckfastleigh Town Council (0048)	
<b>Strategic Policy 2.2</b>	Support	Natural England (0046)	
<b>MM13</b>			
<b>Paragraph 2.3.24</b>	Support	Natural England (0046)	
<b>Paragraph 2.3.30</b>	Suggestion to consider call for sites to find available and appropriate projects aiming to deliver net gain	Environment Agency (0058)	DNPA are considering this as the national approach to net gain develops.
<b>Policy 2.3</b>	Support	Natural England (0046) Buckfastleigh Town Council (0048) Sheena Felton (0226)	
<b>MM14</b>			
<b>Section 2.6, Policy 2.6 (3)</b>	Support	Historic England (0220)	
<b>MM16</b>			
<b>Policy 2.8 (2)</b>	Advise policy should be removed and reference to Historic England guidance should be updated	Historic England (0220)	DNPA consider policy contains additional safeguards over national policy and guidance. Reference to guidance to be updated.
<b>MM17</b>			
<b>Paragraph 2.7.1</b>	Support	Environment Agency (0058) Buckfastleigh Town Council (0048)	
<b>Paragraph 2.7.3</b>	Support	Buckfastleigh Town Council (0048)	
<b>Paragraph 2.7.4</b>	Support	Environment Agency (0058)	
<b>Policy 2.9 (3)</b>	Support	Environment Agency (0058)	
<b>MM18</b>			
<b>Section 3.1</b>	Support	JLP Councils (0221)	
<b>Section 3.1</b>	Concern modification amounts to imposition of national housing targets	Buckfastleigh Town Council (0048)	Government does not set housing targets for National Parks. This amendment was considered necessary to align the Plan with the NPPF, better reflect precedent in the policies

			of other National Parks, and to give greater confidence in the delivery housing to meet local needs.
<b>Section 3.1</b>	Concern policy doesn't support local people who have moved away and can't afford to move back to the NP.	Mr S Hutchins (0118)	The definition of Local Person at section 3.3 already includes allowance for this scenario.
<b>MM21</b>			
<b>Policy 3.8 (2)</b>	Concern PD rights should not be removed for householder development	Mr Jeremy Maddock (0083)	The modification already introduces flexibility in how PD rights are removed.
<b>MM25</b>			
<b>Policy 3.11 (3)</b>	Support	Environment Agency (0058)	
<b>Policy 3.12 (3)</b>	Support, but concern policy requirements are onerous	Buckfastleigh Town Council (0048)	DNPA is committed to supporting applicants where they are committed to achieving this policy. To ensure low-impact development is robustly controlled the policy tests do need to be scientifically robust and strictly enforced.
<b>MM32</b>			
<b>Section 6 (Strategy)</b>	Support	Imerys Minerals Ltd. (0198)	
<b>MM33</b>			
<b>Section 6.1</b>	Support	Imerys Minerals Ltd. (0198) Aggregate Industries (0091)	
<b>MM34</b>			
<b>Section 6.1</b>	Support, mod to para 6.1.11 not in track changes doc.	Imerys Minerals Ltd. (0198) Aggregate Industries (0091)	Drafting error will be corrected in final document.
<b>MM35</b>			
<b>Section 6.3</b>	Support	Imerys Minerals Ltd. (0198)	
<b>MM36</b>			
<b>Paragraph 7.1.10</b>	Support	Natural England (0046)	
<b>MM38</b>			
<b>Proposal 7.6 (3)</b>	The alternative site allocation at Buckfastleigh is unsound because: <ul style="list-style-type: none"> <li>• Insufficient consideration of infrastructure costs</li> <li>• Delay to potential delivery</li> </ul>	Coworth Homes (0056) Buckfastleigh Town Council (0048) Ms Beshlie Pool (0223)	The process and considerations DNPA made are set out in detail in ED43 and address these points in detail.

	<ul style="list-style-type: none"> <li>• Unclear why preferred site is more sustainable</li> <li>• Outstanding potential ecological issues</li> <li>• Site is outside Buckfastleigh Parish</li> <li>• Loss of greenfield land</li> </ul> <p>Concern the site will not deliver 45% affordable housing. Concern at loss of greenfield land</p>		
<b>Proposal 7.6 (3)</b>	Support	Dean Court Business Partnership (0050) Gordon White (0224)	
<b>Section 7</b>			
<b>Map 7.12</b>			
<b>MM45</b>	Concern that the settlement boundary for Bittaford does not include a small equestrian facility adjacent to the north western edge of the settlement boundary	Moorhaven Ltd. (0205)	The methodology states that areas of equestrian use are normally excluded from the settlement boundary. Officers do not believe exceptional circumstances exist which warrant inclusion of this area
<b>MM48</b>			
<b>Glossary, Statement of Heritage Significance</b>	Suggested change to definition providing guidance on content of statement. Suggested inclusion of guidance.	Historic England (0220)	Comment does not respond to a soundness issue, existing definition is technically correct. A glossary is not the ideal place for guidance on how a statement should be undertaken.
<b>MM49</b>			
<b>Glossary, Heritage Asset</b>	Support	Historic England (0220)	
<b>MM51</b>			
<b>Glossary, Significance</b>	Support	Historic England (0220)	
<b>Additional Modifications</b>			
<b>AM01</b>			
<b>Paragraph 1.1.8</b>	Concern change to special qualities might be used to restrict nature recovery and afforestation	Buckfastleigh Town Council (0048)	This responds to a drafting error, the revision aligns the special qualities with those in the Management Plan that were agreed through consultation.