

Dartmoor Local Plan 2018 - 2036

Summary of Representations on the Regulation 19 Dartmoor Local Plan 2018 - 2036

1.1.1 This report summarises the individual representations which Dartmoor National Park Authority received during the Regulation 19 consultation on the Dartmoor Local Plan 2018 – 2036, and the Authority’s response. It is intended as a summary of the main issues raised, a full report of all representations and the Authority’s responses to these is available [online](#).

Policy / Para	Summary of comments	Comments by	DNPA Response
Chapter 1			
Section 1.1			
Strategy	Wording of paragraph 1 sentence 3 does not reflect the NPPF para 172, by using the term ‘Major development will not take place other than in exceptional circumstances’, rather than ‘should be refused other than in exceptional circumstances’	Devon Stone Federation (0002)	The wording is considered consistent with the NPPF, ‘should’ in the NPPF allows local policy a degree of flexibility in the application of the policy and the possibility of introducing other criteria which could allow major development to occur in a National Park, other than the exceptional circumstances stated in NPPF para 172. DNPA have not decided to introduce any further flexibility and so the stronger wording is justified. This approach is consistent with other recently adopted National Park Local Plans, e.g. South Downs Core Policy SD3.
Policy 1.1	Part 1 a) and b) are linked with ‘and’ which means that a conflict between the two purposes cannot occur as is suggested in part 2 of the policy.	Devon Stone Federation (0002)	The purposes are presented as in statute, they should not be edited and are both relevant, they cannot be taken as alternatives.

	A statement should clarify that National Park purposes must be given greater weight than the presumption in favour of sustainable development	Moretonhampstead Parish Council (0132)	The purposes are relevant to establishing local planning policies which identify what is and isn't sustainable in the National Park for the purposes of the presumption in favour of sustainable development. The purposes help inform how the presumption is applied in the National Park, they do not directly compete with the presumption in favour of sustainable development, it would not be appropriate to weigh the purposes against the presumption.
	Should reference Special Qualities.	Hazel Jones (0131)	The purposes are presented as in statute, they should not be edited and are both relevant, they cannot be taken as alternatives.
1.1.4	The National Park Duty should not be described as 'secondary' to the purposes	EJW Glendinning (0005)	The Duty is upon the National Park Authority and must be applied in a way which is consistent with the Act. The purposes are for the National Park. It is therefore appropriate to describe the duty as secondary and separate to the purposes, and this assists understanding.
	The National Park Duty should be moved to para 1 to give it more weight	Moretonhampstead Parish Council (0132)	The Duty is upon the National Park Authority and must be applied in a way which is consistent with the Act.
1.1.8	Should reference importance for health and wellbeing	Hazel Jones (0131)	The Special Qualities are taken from the Management Plan and are subject to a separate consultation exercise, the Local Plan has not revisited this work and treated the existing qualities as robust. These Representations can be considered as part of the current Management Plan review.
	Dark night skies should be standalone special quality	Hazel Jones (0131)	
	The way the landscape is managed (farming, forestry etc.) should be top of the list, highlighting the special qualities are reliant on good management	National Farmer's Union (0026)	

Section 1.2			
Vision	Should include commitment to allowing development, communities and the natural environment to adapt to climate change	Environment Agency (0058)	The absence of resilience and adaptation to the climate change section is noted and a Modification is proposed.
	Concern the definition of sustainable development will not achieve development which is sustainable given the current climate emergency	Buckfastleigh Town Council (0048)	The definition of sustainable development is consistent with the NPPF which reflects the Brundtland Commission definition.
	Should reference the role Dartmoor plays in water management and the need for resilience and adaptation to climate change	Environment Agency (0058)	The absence of resilience and adaptation to the climate change section is noted and a Modification is proposed.
	Should reference the 'production of food'	National Farmer's Union (0026)	The production of food is synonymous with the definition of farming, it is difficult to distinguish between the two in policy without inferring the two are distinct.
Section 1.3			
1.3.1	The definition of sustainable development is anthropocentric and does not allow for preserving biodiversity not needed by humans.	Buckfastleigh Town Council (0048) South Dartmoor Community Energy Limited (0195)	Whilst the Brundtland definition of sustainable development is anthropocentric, seeking to ensure human needs are met sustainably, there are many policies in the Local Plan which allow for broader protection of the environment. For example, biodiversity is protected generally regardless of how useful a protected species is to humanity.
Policy 1.2	Various comments seeking detailed text amendments and inclusions related to climate change, brownfield land prioritisation, sustainable transport, use of natural resources, dark night skies and flood risk	Various	Detailed responses to the issues raised are available in the full Report of Representations
Policy 1.3	Presumption in favour can be used to undermine National Park purposes	Moretonhampstead Parish Council (0132) Buckfastleigh Town Council (0048)	National Park purposes help inform how the presumption in favour of sustainable development is applied in the National Park. The purposes do not directly compete with the presumption in favour of sustainable

			development and one cannot undermine the other.
	There is no need for the presumption to be repeated from the NPPF	Home Builders Federation (0007)	Clarifying how the presumption is applied in this plan assists clarity and understanding. The policy wording is consistent with the NPPF
Section 1.4			
Policy 1.4	General support for the hierarchy and associated illustrations	Various	
	Local Centres should absorb a higher proportion of housing growth than 60%	Wain homes Ltd. (0057)	Full discussion on how the Authority has apportioned forecast development to the settlement hierarchy is available in Section 5.5 of the Housing Topic Paper.
	South Brent is capable of absorbing a higher proportion of growth within the Local Centres	Wain homes Ltd. (0057)	
	Insufficient land has been identified for development within Buckfast	Pearce Fine Homes (0206)	Full discussion on how the Authority has ensured sufficient housing will be delivered throughout the settlement hierarchy is available in section 8 of the Housing Topic Paper
	Wrangaton and Lovaton should be included as a settlement	Ugborough Parish Council (0193) Burrator Parish Council (0047) Mark Brunsdon (0209)	Full discussion on how the Authority has assessed settlements for inclusion in the hierarchy is available in section 3 of the Vision and Spatial Strategy Topic Paper
	Concern the Local Plan does not consider development in surrounding areas	Bridford Parish Council (0041) Hazel Jones (0131)	In respect of development in surrounding areas, the Authority's Duty to Cooperate Statement sets out how the Authority has cooperated with public bodies, including adjacent District Councils and their development objectives.
	The indicative housing delivery figure should be expressed as a target	South Hams District Council and West Devon Borough	It is consistent with other adopted National Park Local plans to not express housing delivery as a target, this would set an

		Council and Plymouth City Council (0006)	unsustainable precedent in a nationally designated landscape.
1.4.6	Incorrect number of villages and hamlets stated, should be 19.	Mark Brunson (0209)	Error noted, Modification proposed.
Map 1.1	Meavy is not identified as a village and hamlet.	Mark Brunson (0209)	Error noted, Modification proposed.
Section 1.5			
Policy 1.5	Concern the policy will be applied to allocated development sites	Buckfast Abbey (0201)	By virtue of allocated sites inclusion in the plan, they are considered to be policy compliant and not constitute Major Development at allocation stage.
	Confusion around whether 'major development' is the statutory or non-statutory definition	Various	A definition of major development is provided in the policy and this is consistent with the NPPF.
	Suggestion the policy needlessly repeats national policy	Pearce Fine Homes (0206)	A local policy is needed to add clarity to the national policy and support other policies in the local plan which rely on the major development test.
	Concern reference to national need, national economy and the need to pursue alternative options misinterprets the NPPF criteria	EJW Glendinning (0005)	These are considered to add clarity to the national policy and to be sound.
1.6.5	Design principles should include more specific natural environment and dark night skies focus	Hazel Jones (0131)	The principles are intended as a positive list of principles for furthering design and are not intended to cover managing the various potential impacts of development. The Local Plan should be read as a whole; avoiding harmful development impacts are covered by other policies in the Local Plan.
1.6.7	Corrugated metal sheeting should be removed from list, not considered vernacular.	Moretonhampstead Parish Council (0132)	Whilst a more modern addition to the list, metal sheeting is ubiquitous amongst Dartmoor's agricultural buildings and is a

			characteristic feature of Dartmoor's architectural landscape. Whilst more modern, it is consistent with the vernacular principle of being a cheap, freely available and effective material, just as more traditional vernacular would have been in their time. The Local Plan and Design Guide have not sought to fix the Dartmoor vernacular in time, but allow it to change.
Policy 1.6	Policy should not give development plan status to supplementary planning guidance	Home Builders Federation (0007)	The policy does not elevate the status of the Design Guide SPD, it forms a material consideration in accordance with its status.
	Review against Sport England's Active Design Principles	Sport England (0074)	The value of the guidance is noted, DNPA will include a reference and link the Site Development Guides which are published alongside the Local Plan.
	Include reference to the design for crime prevention, fear of crime and disorder and/or secured by design initiative	Devon and Cornwall Police (0034)	Insert at 1.6.5 (Community Safety) reference to design for the prevention of crime, fear of crime and disorder as suggested.
1.6.9	the plan should encourage passive design and local renewable energy generation	Okehampton Town Council (0130) Sticklepath Parish Council (0096) Ashburton Climate Emergency (0165)	These ambitions are pursued within Strategic Policy 1.7 (2) within the limitations of development viability and national policy.
	the plan should seek to exceed building regulations related to energy efficiency	Buckfastleigh Town Council (0048)	
Policy 1.7	Policy should focus on reduction of energy and fossil fuel use rather than carbon emissions	Ashburton Climate Emergency (0165)	The policy is focused on energy and carbon, this is considered appropriate

		Moretonhampstead Parish Council (0132)	
	Some confusion between building regulations and technical housing standards	Various	Unfortunately the language is taken from national policy and guidance and cannot be varied.
	Should pursue Uttlesford principle, building extensions should not result in increase in overall building emissions	Ashburton Climate Emergency (0165)	The Uttlesford principle as described in the representation is not considered accurate, the emerging Uttlesford Local Plan pursues energy efficiency improvements to development in much the same way as the emerging Dartmoor Local Plan. Introducing the described requirement to householders would be very burdensome, building regulations also already requires improvements where notifiable works are being carried out.
	Opportunity to require water efficiency improvements and management measures	Environment Agency (0058)	The policy position is a careful balance taking into consideration various policy alternatives, development viability and national policy. A full discussion on how the Authority has arrived at this policy position is available in the Reducing CO ₂ emissions in new development policy research and recommendations paper ¹ and the Design and the Built Environment Topic Paper.
	The policy should not seek to improve efficiency standards ahead of the government Future Homes standards consultation	Home Builders Federation (0007)	The Future Homes Standard consultation has not concluded and there is no guarantee of an improvement to national standards, in the interim it is appropriate and reasonable to pursue a local approach and this is consistent with national policy and

¹ [DNPA \(2019\) 'Reducing carbon emissions in new development policy research and recommendations'](#)

			guidance. Further discussion on this is available in section 3 of the Design and Built Environment Topic Paper.
Section 1.7			
Policy 1.8	Should reference effects of light pollution	Hazel Jones (0131)	Comments are noted. Modifications are proposed - the addition of quality of life is proposed to part c). The connector between parts c) and d) is proposed to be amended to 'and/or'.
	Part c) should reference quality of life in addition to human health	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	
	The connector between parts c) and d) should not be 'or' which could allow the parts of the policy to be taken as alternatives	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	
Chapter 2			
Section 2.2			
2.2.6	The examples of development types which could impact on Dartmoor's setting should be removed and this be determined on a case-by-case basis.	Imerys Minerals Limited (0198)	The examples are useful as examples, they are not definitive and by mentioning them it does not preclude other development types being found to have an impact.
Policy 2.1	Concern policy fixes the Dartmoor landscape in time and doesn't allow it to respond to change	Buckfastleigh Town Council (0048)	The policy is intended to protect the current special and valued characteristics of the Dartmoor landscape, as identified in the Landscape Character Assessment, from harmful development. is policy does not have any influence over how the Dartmoor landscape may or may not change through non-development related influences, such as agriculture and forestry, which the planning system does not currently have any control over.
	Support for protection given to Dartmoor's landscape setting	Various	

Section 2.3			
2.3.6	Should note risk from the impacts of climate change	Environment Agency (0058)	Noted, a Modification is proposed.
Policy 2.2	Preceding the tests for designated sites and priority habitats (parts b-e) with the mitigation hierarchy (part a) does not reflect the order the tests and hierarchy should be applied	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	The policy is considered sound, however a Modification is proposed which clarifies and helps understanding.
	Protection given to irreplaceable habitats, particularly ancient and veteran trees, and ancient woodland, in the NPPF is not reflected in the Local Plan	Ancient Tree Forum (0213) Woodland Trust (0082)	Veteran trees are referred to in Table 2.1, these are defined by the Ancient Tree Forum as a tree which shows ancient characteristics and by definition includes all ancient trees ² . Whilst the policy therefore includes ancient trees, a Modification is proposed to Table 2.1 for clarity.
	Concern the terminology 'non-functional size' is too ambiguous and not defined, and could allow loss of irreplaceable habitat such as ancient trees	Ancient Tree Forum (0213) Woodland Trust (0082)	Paragraph 2.3.20 states many of Dartmoor's priority habitats will not be suitable for compensation because of their irreplaceable nature, irreplaceable habitats are defined by the NPPF. A proposed Modification inserts this definition into the Glossary for clarity. Individual habitats have not been identified as this could weaken protection, the approach allows for irreplaceable habitats to be identified on a case by case basis.
	Irreplaceable habitats should be defined and identified	Woodland Trust (0082)	All habitats in Table 2.1 are given the same protection as irreplaceable habitats in the NPPF, except where they are of 'non-functional size'. This term was not defined intentionally to allow for professional interpretation. However, in hindsight this could be misinterpreted as allowing for loss

² www.ancienttreeforum.co.uk/ancient-trees/what-are-ancient-veteran-trees/

			of a small piece of irreplaceable habitat, such as an ancient tree, which wouldn't affect the wider network. A Modification to Part 3 e) is proposed to clarify irreplaceable habitats are exempt from the exceptional circumstances in e).
	Policy should require development to 'conserve <u>and</u> enhance'	Natural England (0046)	'Conserve and/or enhance' was stated in error and is not consistent with the Track Changes version of the plan, a Modification is proposed to address the error. Not all development is required to deliver net gain (e.g. householder and small-scale development is only required to contribute towards enhancement), therefore the policy should not require net gain from all development.
	'No net loss' should be replaced with 'net gain'	Natural England (0046)	Two Modifications are proposed to ensure there is no confusion of when biodiversity net gain is applied in policy 2.2 and 2.3.
	The mitigation hierarchy should be applied to all biodiversity across the plan area	Natural England (0046)	A modification is proposed to clarify the mitigation hierarchy applies to all Dartmoor's biodiversity.
	Net gain should be required for the mitigation level of the hierarchy as well as the compensate	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	Noted, modification proposed.
	Definition of international sites does not include all possible sites in Para 176 of NPPF	Natural England (0046)	Not all international sites as stated in NPPF para 176 are relevant to the Dartmoor context. Nevertheless, for clarity and completeness a Modification is proposed to Para 2.3.4.

	Allowing exceptional circumstances for international sites is unlawful	Dartmoor Preservation Association (0022)	The exceptional circumstances for international sites are consistent with national policy and statute, it is not possible to rule out development of these sites in all scenarios.
	Consideration should be given to inclusion of a specific policy for the South Hams SAC	Teignbridge District Council (0059)	The South Hams SAC is mentioned specifically in policy preamble, its protection is otherwise consistent with the strategic policy and this approach is considered sound.
2.3.24	The policy should not only apply to unprotected habitat, it should also be used to guide compensation of protected habitat.	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	This is noted and a Modification is proposed.
Policy 2.3	General support for inclusion of the policy	Various	
	All development should be required to deliver net gain, regardless of whether there is an impact on biodiversity, this is suggested in the draft Environment Bill	Natural England (0046) South Hams District Council and West Devon Borough Council and Plymouth City Council (0006) Woodland Trust (0082)	The Environment Bill is currently in draft and has not received Royal Assent. Requiring all development to achieve net gain is problematic as sites may not have the scope to deliver and it will not always be proportionate to minor proposals (e.g. change of use to 1 st floor flat). DNPA's policy approach does not require all development to achieve net gain, development below the threshold is only required to make a 'proportionate contribution to biodiversity enhancement', this is not equivalent to net gain as defined by the Natural England metric. Development is also only required to deliver net gain where it has an impact on biodiversity, ensuring a proportionate approach which

			doesn't unnecessarily burden minor development, such as changes of use.
	Encourage more environmentally friendly land management practices, e.g. natural regeneration, species re-introduction and re-wilding	John Willis (0029) Environment Agency (0058)	The planning system nor the Local Plan have powers to control land management practices unrelated to development.
	Further clarity needed on financial contributions	Buckfastleigh Town Council (0048)	This is intended to be established on a case by case basis to cover the costs of net gain in each scenario. Further guidance is intended to be provided post-adoption of the policy.
Section 2.4			
Policy 2.4	Should acknowledge role these features play in flood management	Environment Agency (0058)	Acknowledged, but this criteria is not directly related to the reasons for which areas of conservation of importance are designated as set out in the Wildlife and Countryside Act 1985 and should not therefore form part of the policy's reasoned justification.
Section 2.5			
Policy 2.5	Concern about the impact of dark sky status on development proposals in adjacent Districts and that more certainty about DNPA's intentions should be included in preamble	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	The potential for dark sky status to impact on adjacent planning authority areas is acknowledged and discussed in the Natural Environment Topic Paper section 6.2. It is concluded that significant impact is unlikely due to the presence of significant settlements along the National Park's boundary, but that neighbouring authorities should be given sufficient notice and opportunity to comment on proposals as they emerge. Evidence surrounding dark night skies is continuing to emerge and DNPA have not yet finalised their intentions. It would not be appropriate to add this to

			policy preamble as the Local Plan has no power to influence dark night sky status, doing so would be misleading.
Section 2.6			
2.6.2	National Park designation means that non-designated heritage assets may have higher significance and be given greater weight in decision making than a comparable asset outside the National Park.	Devon County Council (0049)	Guidance on determining an asset's significance is provided by Historic England, the asset's location within a designated landscape is not a criteria which could be used to elevate significance. Indeed doing so could weaken designation outside designated landscapes. The proposed policy provides a high level of protection to heritage assets, commensurate with National Park purposes.
Section 2.7			
Section 2.7	Consider moving section between section 2.3 and 2.5	Environment Agency (0058)	Noted, modification proposed moving section to 2.5.
2.7.1	Plan should acknowledge the Moor's role in helping to adapt to the impacts of climate change.	Environment Agency (0058)	Noted, Modification proposed.
2.7.4	Purpose of FRA is to demonstrate the flood risks to and from a proposed development, although it does inform the sequential test, that is not its purpose.	Environment Agency (0058)	Noted, a modification is proposed.
Policy 2.9	The plan should make provision for major development in downstream Districts providing contributions to off-site natural flood management works within the National Park	Environment Agency (0058)	Acknowledged, although this falls outside the National Park so the Authority has no ability to pursue within its Local Plan. This will be considered for future Duty to Cooperate conversations with consideration given to national policy constraints.
Graphic	The exception test should only be applied after the sequential test	Environment Agency (0058)	The policy wording states the exception test is only applied for development which does not satisfy the sequential test.
Chapter 3			

Section 3.1			
Policy 3.1	The increase to the indicative housing delivery figure is not justified	Cavanna Homes (0013) Claude Williams (0088) Bridford Parish Council (0041)	A discussion of how the indicative housing delivery figure has been calculated and evidence to support its accuracy is provided in section 4 and 5 of the Housing Topic Paper.
	The indicative housing delivery figure is insufficient to meet Dartmoor's needs	Wainhomes Ltd. (0057) Cavanna Homes (0013) Pearce Fine Homes (0206)	
	There is insufficient evidence to demonstrate the indicative housing delivery figure will meet Dartmoor's needs	Cavanna Homes (0013) Wainhomes (0057) Home Builders Federation (0007) South West Housing Association Planning Consortium (0010)	
	The indicative housing delivery figure should be expressed as a target	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006) Wainhomes Ltd. (0057)	National Park Authorities are exempt from the housing delivery test and it is consistent with other adopted National Park Local Plans to not express housing delivery as a target. A target would set an unsustainable precedent whereby land in a nationally designated landscape could be released for development regardless of local need, this would not achieve the conservation and enhancement objectives for National Parks as expressed through national policy.
	A Strategic Housing Market Needs Assessment is required to determine Dartmoor's Objectively Assessed Need (OAN)	South West Housing Association Planning Consortium (0010)	Using Strategic Housing Market Needs Assessments to determine housing need is now not directly supported by national policy.

	<p>A Local Housing Needs assessment is required to determine Dartmoor's housing need in accordance with the Government methodology</p>	<p>Home Builders Federation (0007)</p>	<p>National policy supports National Park Authorities identifying a housing need figure using a locally determined methodology. The Authority's methodology is locally appropriate and consistent with the methodologies of other adopted National Park Local Plans. Further discussion is available in section 4 and 5 of the Housing Topic Paper.</p>
	<p>The indicative housing delivery figure is insufficient to meet the 600 homes to be delivered within the JLP plan area</p>	<p>Wainhomes Ltd. (0057)</p>	<p>The Authority and JLP Councils believe the Local Plan will deliver sufficient housing to meet the 600 home allowance, further discussion of how this has been agreed, evidence to support its deliverability and how this will be monitored is available in section 4.2 and 5.4 of the Housing Topic Paper and section 2.5 Monitoring and Governance Topic Paper.</p>
	<p>Detailed queries over how the Authority's housing supply figures are calculated</p>	<p>Various</p>	<p>Detailed queries over the Authority's housing supply figures are addressed in the Full Report of Representations.</p>
	<p>The need for housing needs assessments to justify development is likely to act a barrier to development, particularly on brownfield sites</p>	<p>Teignbridge District Council (0059)</p>	<p>Housing needs assessments allow the Authority to ground truth local affordable housing need before a development is permitted, this provides a safeguard against the oversupply of housing and ensures that land within the National Park is only released to meet identified local needs. Given the weight given to the conservation and enhancement of the National Park in national policy the Authority do not believe that strategic housing need evidence is</p>

			sufficient to safeguard against oversupply, this is emphasised in an existing supplement planning document, see section 1.2 of the Affordable Housing SPD.
	A consistent methodology for housing needs assessment should be presented in policy	Teignbridge District Council (0059)	Details on housing needs assessments are provided in Chapter 1 of the Affordable Housing SPD, following adoption of the Local Plan the Authority is looking to update its SPD and provide more detailed guidance where appropriate
	There is not sufficient allowance for the provision of open market housing to address Dartmoor's demographic issues	Cavanna Homes (0013)	A discussion justifying affordable housing delivery's priority section 4 and 5 of the Housing Topic Paper.
	100% staircasing is not supported		Discussion of staircasing restrictions is addressed at section 7.14 of the Housing Topic Paper.
3.1.13	Vacant building credit should be mentioned in policy, and where this results in no affordable housing requirement an affordable housing needs assessment should not be needed to justify development	Baker Estates (0187)	Vacant building credit is a national policy and is subject to change or withdrawal. By not mentioning VBC within Local Plan policy DNPA rely on the national policy approach to inform decision making. This helps ensure the Local Plan stays up to date and is not superceded by a changing national policy framework.
Section 3.2			
Policy 3.2	Confusion between Technical Housing Standards and the Government Future Homes Standard consultation	Various	
	The pursuit of nationally described space standards is not justified by need and viability evidence	Home Builders Federation (0007)	The policy wording related to space standards is flexible and does not restrict market housing to national space standards, but requires them to <u>not significantly exceed</u> them on the basis this is likely to ensure

			market housing meets Dartmoor's open market needs, given Dartmoor's affordability issues. Evidence supporting application of nationally described space standards is discussed at section 6.8 of the Housing Topic Paper, 4.2 of the Design and Built Environment Topic Paper and viability tested within the Whole Plan Viability Assessment.
	The pursuit of M4(2) standards is not justified by need evidence	Home Builders Federation (0007)	The evidence and justification for pursuing M4(2) standards is provided in section 4.1 of Design and Built Environment Topic Paper and section 6.2 of the Housing Topic Paper. Evidence includes demographic, local and strategic housing need assessments, and condition of the existing housing stock.
Section 3.4			
3.4	25% discount is not sufficient to make houses affordable	Buckfastleigh Town Council (0048)	Evidence in section 4.10 to 4.14 in the Housing Topic Paper discusses housing affordability and how affordable housing is tailored to meet the needs of Local Persons. A range of affordable housing types are used to meet different needs. Further discussion of this is available in section 6 of the Housing Topic Paper.
3.4.8	Setting a restriction on the maximum size of affordable homes is too restrictive	South West Housing Association Planning Consortium (0010)	The restriction is a proportionate response to ensure affordable homes are not overly large and remain affordable for those whom they are intended to serve. See further discussion in the Housing Topic Paper at section 6.8
Policy 3.3	Development on greenfield sites should not be permitted	Various	The National Park's indicative housing

			<p>delivery number cannot be met without developing on some greenfield sites, further information on available development sites is available in the Development Sites Topic Paper and is supported by evidence in the Strategic Housing Land Availability Assessment</p>
	<p>Seeking Affordable Housing on small sites is not consistent with national policy</p>	<p>Mid-Devon District Council (0009)</p>	<p>An exception to the NPPF has been justified due to the socio-economic pressures the National Park is facing and is justified by prior delivery rates, section 2.5 of the Housing Topic Paper discusses the current national policy framework. National policy guidance now recognises that (Ref ID: 67-009-20190722):</p> <p><i>“People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these needs and opportunities, especially where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.”</i></p>
	<p>Allowing the proportion of affordable housing to be varied through development viability is likely to undermine the plan’s objectives and sustainability</p>	<p>Dartmoor Preservation Association (0022)</p>	<p>DNPA are required to take into consideration development viability in accordance with the NPPF, including this in local policy ensure clarity.</p>

	A greater degree of market housing should be supported on exception sites	Wainhomes Ltd. (0057)	A greater level of open market housing to support the delivery of exception sites is not considered necessary, Dartmoor's delivery rates demonstrate that rural exception sites with 100% affordable housing (and up to 25% open market where essential to support viability) are sufficiently deliverable to support delivery of the indicative housing figure. New policies for Rural Settlements bring about some more opportunities for open market housing on infill sites and greater flexibility around how affordable housing is delivered, see section 8 of the Housing Topic Paper.
Policy 3.4	Settlement boundaries should not preclude obvious infill sites	The Walkhampton Trust (0211)	The methodology for drafting the settlement boundaries is discussed in section 4 of the Vision and Spatial Strategy Topic Paper. All settlement boundaries are drawn in accordance with this methodology, whether a site is or is not suitable for development is not a relevant consideration.
Section 3.7			
Policy 3.6	Confusion over whether the policy allows unrestricted market housing	Various	The policy allows housing to come forward in accordance with the strategic housing policies 3.3-3.5 and the affordable housing thresholds within those policies.
	There should be no size restriction on custom and self-build housing	Teignbridge District Council (0059)	A size restriction on affordable and local needs custom and self-build housing is appropriate and justified to ensure the policy does not become a work around to affordable housing requirements.
Section 3.8			

3.8.9	The criteria at 3.8.9 will not always be appropriate and exceptions may be necessary, particularly related to the location of extensions	Christine Chapman (0018)	The criteria are intended as general guidance for most circumstances, they are sound and well established. They can be applied flexibly where the local context justifies it.
Policy 3.7	Outbuildings should not contribute to the 30% allowable additional habitable floorspace, because the methodology doesn't allow them to contribute to it	Gabrielle Morse (0180) Annie Martin (0164)	The 30% rule is intended to manage both affordability and design of houses. Including outbuildings in the initial floorspace calculation would not uphold the policy's design objectives. To ensure the policy does not incentivise creation of converted outbuildings to circumvent the policy it seems appropriate to include this in the floorspace which contributes to the rule being met. See section 9.3 of the Housing Topic Paper.
	The 1995 date puts an unfair burden on homeowners	Annie Martin (0164)	The policy shift is considered a reasonable and justified approach for managing the loss of smaller dwellings in the National Park. Similar approaches have successfully been applied in other National Parks with significant rural housing pressures, such as Exmoor and the New Forest. The approach is discussed in more detail in section 9.3 of the Housing Topic Paper
	A house with a greater area than the house in 1995 should be allowed to use the larger area for application of the 30% rule	Annie Martin (0164)	This approach would directly undermine the policy's intent and is not supported.
Policy 3.9	General concerns about how the planning system as a whole is overly complicated and costly for farmers	National Farmer's Union (0026)	Significant amendments have been made to DNPA's policies to ensure there is a proportionate level of flexibility to support farmers needing to diversify their incomes

			and complete farm successions. See section 6.14 of the Housing Topic Paper.
	The size restriction of 106m ² for a rural workers dwelling is too small	EJFP Planning Ltd. (0045)	The size restriction is considered to be justified and an appropriate safeguard against the oversizing of accommodation which then becomes unaffordable to rural workers working locally and there is risk of its loss. See section 6.14 of the Housing Topic Paper.
	Farm dwellings should need to demonstrate biodiversity net gain for the entire farming enterprise		Whilst a good idea, there is not the legislative or policy framework to allow the planning system to have such control over the environmental impact of the farm enterprise, the use of land for agriculture is not a use the planning system controls.
	Anti-severance agreements are not justified and are overly restrictive	Amanda Burden (0192)	Evidence in section 6.14 of the Housing Topic Paper sets out evidence which justifies this approach and explains the flexibility embedded within it.
Section 3.10			
Policy 3.11	The test for seeking alternative sites outside the National Park is overly restrictive	Mid-Devon District Council (0009)	The Regulation 19 policy wording was amended, the approach is considered reasonable and deliverable. The test for a suitable alternative site includes assessing need and is not just related to environmental impact.
	The criteria-based approach is not sufficient to meet the need	Devon County Council (0049)	The criteria-based approach has been used and delivered against an equivalent or greater need over the last plan period. This issue is discussed at section 6.12 of the Housing Topic Paper.

	Policy should refer to residential mobile and park homes being highly vulnerable to flooding	Environment Agency (0058)	Noted, Modification proposed.
Section 3.11			
Policy 3.12	Concern requiring low impact residential development to be at least well-related to the settlement hierarchy is overly restrictive, sites should be well-suited to meet the majority of occupant's needs.	Geo (0199)	It is considered the term 'well-related' allows flexibility and leaves it for the ecological footprint analysis to determine whether the development as a whole achieves the policy objectives.
	C) should refer to net gain	Geo (0199)	Net gain is focussed on biodiversity or environmental enhancement, it does not include social and economic contributions also stated in c)
	Consider focussing the policy on regenerative development, rather than low impact	Geo (0199)	Noted, but the act of development is not in and of itself regenerative, although it is appreciated it can enable regeneration of surrounding land through policy initiatives such as net gain. This is more an offsetting exercise and it is felt the term regenerative development is misleading.
	Policy should refer to specific proportion of needs that are to be met on-site	Geo (0199)	Measuring 'needs' by percentages is difficult and filled with potential methodology issues and will not necessarily achieve the policy ambition, the policy therefore leaves an appropriate balance to be established on a case by case basis
	Reference to 3.9.3 in para 3.11.5 is an error	Geo (0199)	Noted, modification proposed.
	The policy criteria are too restrictive	Buckfastleigh Town Council (0048)	The policy criteria are considered proportionate and reasonable to justify an exceptional development practice in a nationally designated landscape, further

			discussion of our approach is available in section 6.13 of the Housing Topic Paper.
	The policy should require submission of a management plan to be met at year 5 of first occupation, and a monitoring plan at 5 years to demonstrate compliance.	One Planet Council (0175)	The inclusion of a five year timeframe to demonstrate compliance with the Business and Improvement Plan is noted and a Modification proposed.
Chapter 4			
Section 4.1			
Policy 4.1	DNPA should be more proactive in the defence of existing community services and facilities and promote the need for new services and facilities	Buckfastleigh Town Council (0048)	The level of protection of community services is proportionate to the powers the planning system has to control the use of land
	General support for the flexibility given for community services and facilities related development	Various	
	There should be a period of marketing required prior to loss of a community facility	Sticklepath Parish Council (0096)	The level of protection given is stronger than the requirement for marketing evidence. Where the site is a business or employment site, protection is also given to the use through Policy 5.1 part 4. Where the use also falls within a town centre, marketing evidence is required.
Section 4.2			
Policy 4.2	Concern the evidence supporting the policy is not robust as it could be	Sport England (0074)	The evidence supporting the OSSR is proportionate to the scale of development occurring in the National Park, Dartmoor's relatively isolated setting, and the development priorities of the area. Drawing on evidence of Districts is an effective and proportionate approach which is justified in the OSSR. To support this evidence DNPA have also consulted with communities

			throughout the Local Plan process and asked them to identify any infrastructure needs or shortfalls, including for open space, sport and recreation infrastructure.
	Recommendation that DNPA are more involved in District evidence gathering	Sport England (0074)	DNPA do and will continue to seek to be involved in evidence gathering relevant to the National Park
Section 4.3			
Policy 4.3	Concern DNPA have not consulted effectively with all transport bodies in relation to the Duty to Cooperate and specifically on the opportunity to extend the Buckfastleigh to Totnes heritage line to Ashburton	Friends of Ashburton Station (0090)	DNPA have consulted with relevant statutory consultees on all transport matters, including the Office for Road and Rail, Heart of the South West LEP, Network Rail and Devon County Council. The extension of the heritage line was not specifically identified as a strategic matter where cross-boundary cooperation was required.
	DNPA should consider introducing a congestion charge	John Willis (0029)	The Local Plan and DNPA do not have the regulatory powers to introduce a congestion charge. A congestion charge system has been considered previously at a strategic level with DCC, the Highway Authority. However, because of the density of Dartmoor's road network the infrastructure and processes necessary to control this would be cost prohibitive, relative to the contributions that could be gathered.
	Concern the North Dartmoor rail route isn't given sufficient support	Friends of Ashburton Station (0090)	The North Dartmoor rail route is given support consistent with that of the neighbouring strategic plan, the South West Devon Joint Local Plan. The issue is discussed at section 4 of the Transport Topic Paper.

	The A382 cannot support development in either of the Local Centres along its length (Horrabridge and Yelverton)	Barry Hocken (0110)	Consultation with Devon County Council Highways Authority indicates the level of growth proposed in Horrabridge and Yelverton can be supported by existing transport infrastructure.
	The plan should seek to improve public transport provision	Ashburton Climate Emergency (0165)	The Local Plan seeks to improve to improve public transport provision by delivering development in sustainable locations where existing transport connections exist, thereby indirectly improving the customer base and viability of such connections. The Plan cannot directly support the costs of public transport subsidy through developer contributions.
Policy 4.5	EV charging points should source electricity from renewable energy suppliers and support should be given to solar PV chargers in car parks linked to chargers	Ashburton Climate Emergency (0165)	It is not possible for the Local Plan to control the electricity source
	Plan EV targets for communal parking should be more ambitious	Sticklepath Parish Council (0096)	Communal parking targets are carefully balanced against development viability, recognising the cost of controlled access EVCPs is more costly.
	These requirements will be superseded by a Building Regulations update	Home Builder's Federation (0007)	The Government consultation is noted, but has not concluded and it is not yet clear what the Government response will be. It is therefore appropriate to continue to pursue a local approach in the interim, making assumptions about the Government response is inappropriate.
	Concern there is not sufficient capacity on the grid to provide the points without costly upgrades	Home Builder's Federation (0007)	Western Power have been consulted on all allocated sites and connection costs have been calculated, taking into consideration provision of electric vehicle charging points.

			Western Power have confirmed that no major or out of the ordinary infrastructure improvements are necessary to accommodate the growth proposed in the plan. See Infrastructure Delivery Plan for further details.
	Concern this could negatively impact development viability	Home Builder's Federation (0007)	The policy allows for an alternative level of provision should this be essential for development viability.
	Requirements should be made for installation of EVCPs in the existing housing stock	Ashburton Climate Emergency (0165)	The planning system has limited ability to control the retro-fitting of the existing housing stock, building regulations has more ability in this respect.
Section 4.5			
Policy 4.8	The plan should be clear on its strategy for 5G telecommunications masts	John Richards (0170)	The plan does not differentiate between different telecommunications technologies, all are considered on a case-by-case basis using the policy criteria.
	Concerns about health and biodiversity impacts from 5G telecommunications masts	Ashburton Climate Emergency (0165)	National policy explicitly states that local planning authorities should not set health safeguards for electronic communications systems.
Section 4.6			
Policy 4.9	Concerns the plan and HRA are silent on mechanisms to mitigate recreational impact on the Plymouth Sound and Estuaries European Marine Site (EMS) Zone of Influence	South Hams District Council and West Devon Borough Council and Plymouth City Council (0006)	This issue has been addressed in an HRA addendum and revised Statement of Common Ground between the JLP Councils and Natural England.
Chapter 5			
Section 5.2			

Policy 5.1	Concern the general protection of business uses is not clear and does not provide enough flexibility to allow for supporting D or A Class uses, such as retail, leisure and recreation	FMB Projects Ltd. (0011)	There is sufficient flexibility in policy to allow ancillary employment uses, a town centre
Section 5.3			
Policy 5.2	Concern the 150m2 threshold is not justified, a higher threshold is more appropriate particularly for offices.	Peninsula Properties (0063)	The approach is considered to be justified and aligned with permitted development thresholds. Further discussion is provided in section 6.4 of the Economy Topic Paper.
Policy 5.3	Concern 6 months marketing is too short and the further 6 month cascade is not necessary	Moretonhampstead Parish Council (0132) Sticklepath Parish council (0096)	The approach is considered appropriate to allow greater flexibility in the use of our high streets and support their future in the face extreme market pressures. Further discussion of the approach is available at section 6.5 of the Economy Topic Paper
Section 5.4			
Policy 5.4	Removal of a holiday let condition should not be required to become an affordable home pursuant to part 4 c)	Mr A Lopes (0055)	This is an established approach, without this the policy would allow an unjustified market dwelling in the open countryside contrary to other policies in the plan.
Policy 5.6	Concern about resistance to shepherds huts, pods and temporary structures and statements regarding their impact on landscape character	Jeremy Thres (0214)	The statement is not intended to be absolute, a proposed modification highlights the statement gives an indication of the impact these structures can have and how this will be considered
	Concern about statement regarding long term siting of structures no supporting the economy at paragraph 5.4.11	Mr A Lopes (0055)	Siting structures on land permanently when not being used by tourists does not have a direct benefit to the economy whilst impacting on landscape character.

	The policy should seek to encourage improvements to the landscape impact of existing caravan sites	Michael Shaw (0171)	The policy requires this development type to conserve and/or enhance landscape character and this is emphasised 5.4.10. .
	Policy should acknowledge vulnerability of this development type to flood risk	Environment Agency (0058)	Noted, modification proposed.
Policy 5.7	Policy should require land management plans, like required in policy 5.9, to achieve environmental net gains	Environment Agency (0058)	The planning system does not control the use of land for agriculture or forestry and so does not have the regulatory powers to control what land management practices are carried out. Equine use is a controllable land use under the planning system and so this justifies the approach in policy 5.9
5.6.3	Concern setting thresholds which exclude small holdings and hobby farmers exclude valuable land managers	Jeremy Thres (0214)	Farm diversification is intended to support the viability of established farming businesses. Small holdings and hobby farms are generally not viable businesses and so supporting diversification is not justified. Importantly the criteria are not land-based, they are financial and work based and therefore do not exclude productive farms on a small land-holding.
Chapter 6			
Strategy			
Strategy	Use of recycled materials will not always be appropriate, should only be required as far as practical	Devon Stone Federation (0002) EJW Glendinning (0005) Aggregate Industries UK Ltd. (0091)	Noted, amendment proposed to introduce recommended language
Section 6.1			
Policy 6.1	Concern the test for 'large scale' competes with and lowers the test for 'major development' and is not	Cornish Chamber of Mines and Minerals (0203)	Noted, modification proposed which will make Major Development the principle test

	supported by national policy	Aggregate Industries UK Ltd (0091) Imerys Minerals Ltd. (0198) Devon Stone Federation (0002) EJW Glendinning (0005)	for determining the acceptability of minerals development.
	Economic contribution of minerals development should be emphasised	EJW Glendinning (0005)	Noted, but the economic contribution of minerals is considered to be clear and it is not considered necessary to mention the contribution to employment made by each type of economic development throughout the plan.
	Mining activity should be restricted in size and power of machinery	Rikki Elliot (0166)	Focusing the policy on the impacts of operations ensures it continues to guard against potential harmful effects regardless of technology advancements and changes in the minerals industry.
	Concern preamble and policy wording minerals development has negative impacts	Imerys Minerals Ltd. (0198)	It does not indicate a predisposition, towards a position that minerals operations are always negative, but is a reflection that this policy seeks to mitigate potential negative effects of a development.
	Part 4a should only relate to negative impacts	Imerys Minerals Ltd. (0198)	An amendment is proposed at Policy 6.1(4)(a) to clarify this only relates to negative effects.
	Local need for minerals should relate to the supply of conservation materials outside the NP	Devon County Council (0049)	Noted, though it would be important that this is clearly related to building conservation. A small modification is proposed to the supporting text at 6.1.5.
Policy 6.3	Policy should set out criteria for development being permitted in minerals safeguarding area	South West Aggregates Working Party (0077)	Supporting text paragraph 6.1.10 describes that the Authority will take into account

			opportunity for prior extraction and non-sterilising uses and believes this to appropriately cover this area.
	Mention of clay should be made	Imerys Minerals Ltd. (0198)	Noted and minor modification proposed.
	The list of minerals safeguarding areas are not consistent with the policies map	Devon County Council (0049)	An amendment is proposed to 6.1.11 which makes clear the list is a summary of the key safeguarding areas
Section 6.2			
Policy 6.6	The plan should seek to exploit Dartmoor's wind resource to address climate change by supporting wind turbine installation across the National Park	South Dartmoor Community Energy Limited (0195) Tony Whitehead (0200) Katie Reville (0169) Jeremy Thres (0214) Sophie Phillips (0196) Ashburton climate Emergency (0165) Regen (0183) John Willis (0029)	Following the Written Ministerial Statement on wind energy development DNPA has not sought to identify areas where wind development would be acceptable because of the fundamental conflict this development type has with the landscape character and tranquillity of the National Park which DNPA are required to protect in accordance with its purposes.
	Large scale renewable energy development which does not harm Dartmoor's special qualities should be supported	Ashburton climate Emergency (0165) South Dartmoor Community Energy Limited (0195) Tony Whitehead (0200) Jinni King (0168) Katie Reville (0169) Sophie Phillips (0196) Regen (0183) Newton and Noss Environment Group (0197)	Noted, a modification is proposed which makes the major development test the relevant consideration when determining if a renewable energy development is appropriate in the National Park or not.

Chapter 7			
Proposal 7.4, Proposal 7.17	Support identification of rail related sites at Ashburton and South Brent and believe safeguarding should go further to include Okehampton	Friends of Ashburton Station (FoAs) Emery Planning (supports South Brent) (0057)	Okehampton site falls outside Plan area
Section 7 (proposals)	Potential for cumulative loss of undesignated habitat (hedgerow, trees and grassland) across the site options, which could have a negative effect on local wildlife movement and habitat linkages	Natural England (0046)	Protected through policies in Plan and Site Development Briefs
Policy 7.2	Local Plan should clarify the relationship between the draft Local Plan and Neighbourhood Plans regarding the role of the DNPA, and also the roles of adjoining LPAs.	South Hams/West Devon Councils (0006)	A modification is proposed to paragraph 7.1.12 which clarifies
Section 7.3 (Ashburton/Buckfastleigh)	Desire for cycle route to be delivered as part of development plans in Ashburton/Buckfastleigh	Buckfastleigh Town Council (0048)	Noted in Infrastructure Delivery Plan
Section 7.3 (Ashburton, Buckfastleigh, South Brent)	Project level surveys for SAC protection should be referenced in the site allocation wording.	Natural England (0046)	All policies allocating sites in the South Hams SAC Landscape Connectivity Zone state a requirement for sufficient evidence to be provided to inform an appropriate assessment.
Proposal 7.12	Remove 'where possible' to require an overall reduction in flood risk from the development	Environment Agency (0058)	To remove the phrase 'where possible' would be unreasonable were it to prove not possible, therefore making the allocation unachievable
Section 7.3 (Buckfastleigh)	Objection to the non allocation of land at Timbers Road Buckfastleigh (sustainable location, will meet identified housing need, underdelivery of other sites)	PCL Planning (for Dean Court Business Partnership) (0050)	Additional housing site in Buckfastleigh is not required. Local Plan has been through an appropriate site selection process. No change proposed.

Proposal 7.5	Objection to allocation of land at Barn Park (privacy, flood risk, access, biodiversity)	Buckfastleigh Town Council (0048)	There is a current planning application on this site. The issues identified form part of the application, and the ability to overcome such issues will therefore be considered as part of the process.
Proposal 7.21	Support for allocation with comments around bat roost, details of development type, yield, and preference for this site to be meeting the towns housing need	Buckfastleigh Town Council (0048)	Noted and no changes proposed
Section 7.4 (Buckfastleigh)	Objection to the non allocation of land at Oaklands Park, which is deliverable and required in addition to the sites identified in the Plan to meet the identified housing need.	EJFP Planning (for landowners) (0053)	Proposed additional site constrained and not required.
Proposal 7.8	Support allocation, but allocation area should be expanded to improve viability	T Garratt (0115)	Lack of justification for larger allocated area. No change proposed
Proposal 7.7	Support allocation at Lamb Park Chagford	Andrew Kirby Architects (for D Booth) (0184)	Noted
Policy 7.12	Support allocation. Propose wording changes around site yield and link to Wray Valley Trail.	Collier Planning (for Baker Estates) (0187)	Amendments not justified (and superseded by planning application)
Proposal 7.4	Strategic approach to managing flood risk should be undertaken for the delivery of development on this site.	Environment Agency (0058)	Complexities with the site have meant that a strategic approach has not proven achievable, and a more open approach to options with clear need to FRA is considered reasonable.
Policy 7.11	Objection to the non-allocation of land at Courtenay Park, Moretonhampstea (would lead to an under-delivery in the settlement (linked with other comments in respect of housing numbers) suitable sustainable location, SA/SEA not undertaken correctly, other sites not delivering)	Boyer Planning (for Cavanna Homes) (0013)	The site selection process has been undertaken robustly, supported by SA/SEA, evidence of need, and public consultation. The additional site is not required to meet the housing need.
Proposal 7.10	Objection to site capacities and lack of detail on affordable housing requirements	Moretonhampstead Parish Council (0132)	Consistent methodology to housing numbers applied. Housing policies are clear in responding to local need. Change.

Proposal 7.11	Support allocation, but do not support the yield figure.	Bell Cornwell (for S Ellis – landowner) (0204)	Proposed modification to yield figure
Section 7.3 (South Brent)	Objection to the non-allocation of land at Noland Park South Brent (suitable location for growth, could deliver small scheme, needs not met, preferable to identified sites)	Emery Planning (for Wainhomes) (0057)	Local Plan is needs led not capacity led, scale of allocation is not required, identified allocations will meet need and have been through robust site selection process.
Proposal 7.15	Support allocation of land at Palstone Lane, request site allocation is expanded further.	Greenslade Taylor Hunt (for J Dennis - landowner) (0189)	Noted, no additional land required.
Proposal 7.19	Objection to allocation of land at Binkham Hill, Yelverton (number of homes should be reduced, need not identified, loss of farmland, services needs)	P Pine (0114)	Appropriate protection exists through allocation and policy. No change.
Section 7.4 (Yelverton)	Objection to the non-allocation of land at Gratton Lane for downsizing and retirement development in addition to the allocated sites.	EJFP Planning (for A Lopes – landowner) (0055)	Site is not required in order to meet the identified need in Yelverton, no proposed change.
Section 7.3 (Yelverton)	Objection to the non-allocation of land at Dousland Road, Yelverton, as preferable to sites identified in the Local Plan to meet the identified housing need.	Heynes Planning Ltd (0015)	The site was submitted to the LAA but did not have access and was not achievable. The identification of potential access came late in the Plan Review process and suitable sites have been identified. No change proposed.
Policy 7.1	Object to settlement boundary for Buckfast excluding land off Abbey Grange, Buckfast	Pearce Fine Homes (0206)	Drawing the boundary in this way would not be consistent with the methodology for drawing settlement boundaries
Policy 7.1	Objection to inclusion of the SAC within the settlement boundary at Buckfast	Natural England (0046)	Boundaries are drawn using settlement features, not planning constraints.
Policy 7.1	Objection to part of the settlement boundary at Bittaford (exclusion)	Bell Cornwell (0205)	Part amendment identified in modifications
Policy 7.1	Support for Settlement Boundary at Christow	Bell Cornwell (0011)	Noted
Section 7.4 (Mary Tavy)	Settlement boundary is drawn too tightly	Stride Treglown (for S Hutchins) (0118)	Settlement boundary is drawn in accordance with the methodology

