

STAVERTON NEIGHBOURHOOD PLAN – REG 14 DRAFT PLAN – GROUP RESPONSE TO SHDC COMMENTS

Policy / para no	Summary of Comment (original available for inspection)	Response (with proposed changes shown in bold type)
General comments about the plan		
General comment	Wherever comments made prior to Reg 14 have not been addressed, this should be discussed with SHDC during preparation of the Reg 15 version of the plan.	Advice welcomed and such consultations carried out.
Foreword		
First para	The plan will not have full force until it has been “made” by SHDC. Add at the beginning of the last sentence of para: “ When passed through examination and made by the district council it will form....”	Agreed
1: Introduction and Background		
No comments		
2: Local Context, Vision and Objectives		
2.5	The Parish does not include a small piece of Dartmoor NP. Delete "apart from a small piece of Dartmoor".	Agreed
2.9	This paragraph gives two average house prices for Staverton whilst para 4.3 gives a third which differs from both those quoted in para 2.9.	The figures given in para 2.9 are not the same measure and will differ. That at para 4.3 had not been updated. The correct figures will be inserted at Reg 15 submission.
2.12	The vision effectively provides a good summary of what is seeking to be achieved for the Staverton Parish.	Support welcomed
2.14	The objectives, in largest part, relate well to the Vision and the Policies.	Support welcomed
General comment	Concerns remain regarding the mismatch between the housing objective and the chosen housing strategy.	The group remains convinced that the plan’s approach is right for Staverton given the prevailing circumstances, as explained in the housing evidence paper.

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3: Healthy Communities		
POLICY SNP1: SUSTAINABLE COMMUNITIES	<p>1. The evidence base needs to be enhanced to provide a basis for requiring the type of dwellings that are stated to be needed. Suggest JLP Policy DEV 8 is used as a starting point.</p> <p>3. The provision of a 20 mph Zone is not a land use matter and will need to be agreed with the Devon Highway Authority before it can be included as a priority. The plan should give more detail of what is needed in terms of green energy, sustainable travel and broadband.</p> <p>4. It is suggested this is a separate policy in its own right. It will be necessary to identify the community facilities that are being protected as a list in the Policy and show them on the Proposals Map.</p>	<p>1. This policy deals with the overall sustainability and well-being of the local community and not with housing alone. Comments about the need for additional housing evidence are dealt with at the relevant policies (below).</p> <p>3. Devon County Council has rejected an application for the parish to be part of a pilot scheme for 20mph zones. However, this remains an aspiration and the plan will refer to it as such. The nature of measures to support green energy, sustainable travel and improved mobile and broadband connectivity will vary with the individual application and the needs at the time.</p> <p>4. The group prefers to keep this within policy SNP1 since it is an integral part of the same topic (sustainable communities). The policy will be augmented to list the assets which are safeguarded, as follows:</p> <ul style="list-style-type: none"> • St Paul de Leon Church, Staverton • St Matthew's Church, Landscope • Landscope Church of England Primary School • St Christopher's School, Staverton • the pubs (Dart Bridge Inn, Live and Let Live Inn, Sea Trout) • Court Room, Staverton • Victory Hall, Landscope • the cricket pavilion (Staverton)

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		Some of the community assets considered will be better protected as local green spaces under Policy SNP3 and will accordingly be added to that policy (below). They include Staverton playing fields, the two playgrounds (Staverton and Landscope) and Landscope allotments.
3.6	The choice to identify a Settlement Boundary for Memory Cross is not clear. Similarly the choice to omit the area around Staverton Bridge requires clarification.	The para will be amended to make it clear that Memory Cross is considered to merit a settlement boundary in its own right. Reference to Staverton Bridge as a separate centre will be deleted from the plan.
POLICY SNP2: SETTLEMENT BOUNDARIES	<p>A background paper justifying the Settlement Boundaries should be prepared. Specific issues are as follows:-</p> <p>a. Staverton: The inclusion of the open area to the west of the village and south of Nelson House and Nelson Coach House requires clarity. As it stands there is a presumption of principle support for development at this location. It is acknowledged this is included in the Council's proposed Settlement Boundaries.</p> <p>b. Woolston Green/Landscape: Substantial land to the north west and south east of the village has been included, over and above that subject of the Beara Farm approval, that does not appear in the Council's Settlement Boundary Plans. If this land is included justification is required.</p>	<p>A background paper will be prepared as supporting evidence.</p> <p>a. The boundary is as shown in the topic paper prepared by SHDC for the JLP inquiry. It follows the boundary of Nelson House and Nelson Coach House. There is no open area.</p> <p>b. The settlement boundary is as that submitted to the JLP inquiry, extended to include the two sites allocated in the plan and adjacent properties which are considered to form part of the village's built form. The background evidence paper will provide supporting evidence and the extent of the site to the north west will be retracted as indicated in the response to policy SNP4 below.</p>

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	<p>c. Memory Cross: The JLP does not identify Memory Cross as a Sustainable Village. It will be necessary to fully justify the Settlement Boundary and its delineation.</p> <p>2 It is not clear in the policy or the justification what is meant by “local need”.</p>	<p>c. The background evidence paper will provide evidence to justify the settlement boundary at Memory Cross.</p> <p>2. A local need might relate to housing, employment, open space or any other lack in local provision. The plan will be amended to make this clear.</p>
Policy SNP3: LOCAL GREEN SPACES	Have the owners of the Local Green Space been individually consulted?	<p>Yes. Riverside Walk and Woolston Green Triangle are owned by Staverton PC. Staverton Nature Reserve by parishioners and members of the Community Benefit Trust. All are aware of the plan but we have informed them specifically of this policy.</p> <p>As is set out above, several additional green spaces will be added to those shown in the draft plan. Those to be added are: Staverton playing fields, the two playgrounds (Staverton and Landscope) and Landscope allotments.</p>
4: Housing		
P15: Objective, second para	The closing sentence implies leeway from Government requirements. Suggest that the plan simply encourages that the requirements be exceeded, thus: “We wish all housing to be low carbon and encourage applications to exceed the current government requirements.”	Agreed. The plan will be amended accordingly.
4.2	As indicated in the comments on the Policies SNP1.1 and SNP4.3 justification and evidence for the types of homes	The evidence is provided by our parish survey, opinions expressed at local consultations and also our HNS which

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	required to meet local need, should be provided.	covered sizes of properties and needs.
POLICY SNP4: HOUSING DEVELOPMENT	<p>1b) The site allocated and shown on the Proposals Map is significantly larger than would be required to accommodate 6 dwellings. Furthermore the allocation of a site for 6 dwelling houses will have minimal effect on the provision of affordable housing.</p> <p>2 This statement lacks clarity: what is meant by smaller sites? If the housing need identified is to be met then a quantum of housing numbers is necessary to support affordable housing at sufficient quantity.</p> <p>3 See comments on SNP1 1. If an appropriate local mix is to be sought then evidence is necessary to provide guidance as to what is required.</p> <p>7 Is this not better included in Policy SNP 8 dealing with Broadband requirements?</p> <p>8 As with SNP1 1 and 3 above local need requires full clarification. See Policy SNP5 for comments on single site exception issue.</p>	<p>1b) The map will be corrected to show only the eastern part of the site. To propose more than 6 dwellings on this site would result in excessive development in the village during the plan period since 14 dwellings have already been approved at Beara Farm. The group is aware that the JLP only requires developments of 11 dwellings or more to provide affordable homes on site, but 6 dwellings should deliver a commuted sum.</p> <p>2. The Parish Survey, local opinions at consultations and the HNS indicate a local desire for developments of less than 6 houses. The plan will be amended to refer to that number.</p> <p>3. The evidence base will be reviewed to ensure that it includes all appropriate evidence (local opinions, surveys, HNS and ONS).</p> <p>7. The group prefer to leave this in here and also to add the same requirements at SNP 8.</p> <p>8. The evidence is provided by our parish survey, opinions expressed at local consultations and also our HNS.</p>
POLICY SNP5: AFFORDABLE	<p>1 It is not permissible to preclude private developers from bringing forward exception site proposals.</p>	<p>1. The group have no intention to preclude private developers. Delete “....will be a priority and” replace</p>

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HOUSING AND SINGLE PLOT EXCEPTION SITES	<p>2 This is not required since it simply repeats JLP Policy.</p> <p>3 The Council has engaged in correspondence with the Group regarding this matter, including contacting Shropshire CC, as follows:- <i>"I contacted Maria Howells, a Shropshire planner, just after Christmas to gain an assessment of the success of operating the single plot affordable housing Policy. As you are probably aware the Shropshire Local Plan is currently being reviewed. As part of this review officers undertook informal discussions with Members relating to the future of this Policy. Officers concerns were in summary: that whilst the policy has had limited success, it did generate 'spurious' proposals which involved considerable officer time. Despite this Members opted to retain the Policy but it has been amended to take account of those concerns. I enclose (second enclosure) Shropshire's Reg 19 version of the Affordable Housing policies.</i></p> <p><i>I have discussed this matter with my colleagues in Strategic Planning and DM who, in the light of the Shropshire information and their own experience, do not support, at this stage of the process, the inclusion of a like policy in the Staverton Plan.</i></p>	<p>with "will be welcome particularly where"</p> <p>2. Although repeating JLP policy the group will leave this in as it clarifies the thinking behind the plan's exception site policy.</p> <p>3. The group understand the viewpoint expressed and are not including the Shropshire Model but will follow the advice given, enabling single dwelling exception sites to be considered within the terms of JLP policy TTV27.</p> <p>The plan will make a positive statement welcoming single plot affordable dwellings, as follows:</p> <p>"3. Single plot exception sites will be welcomed, in line with the provisions of JLP policy TTV27, providing ... " - followed by criteria a to e as shown in the draft plan.</p>

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	<p><i>You may be aware that the SDP (enclosed), which provides guidance on the use of Policy TTV27, does state that this Policy can apply to single dwellings. I have copied the relevant advice from the SDP on TTV27 below and highlighted in red the relevant words.</i></p> <p>11.62 TTV27 provides the basis for bringing forward proposals that are an exception to adopted policy providing that they are demonstrably Affordable Housing-led. This policy may be applied to proposals of any scale, including single dwellings.</p> <p><i>My suggestion is that you consider TTV27 and its applicability to the Staverton area. It is possible to use TTV27 as a basis for formulating a locally appropriate policy which reflects local circumstances if TTV27 falls short in taking them into account.</i></p> <p><i>As I have stressed, however, in my advice to the Staverton Group any deviation from JLP Policy must be based on a firm and robust evidence base.”</i></p> <p>Concerns remain that no specific justification for including this Policy requirement in Policy SNP5 has been given.</p>	<p>(The group presumes that SDP is a mistype for SPD.)</p>
5: Business and Enterprise		
P20, aspiration f	Suggest that a definition/explanation of eco tourism is	The plan will include the following definition of eco-

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	given.	tourism: “responsible travel to natural areas that conserves the environment, sustains the well-being of the local people, and involves interpretation and education”.
POLICY SNP6: BUSINESS, EMPLOYMENT AND TOURISM DEVELOPMENT	<p>1 The reference policy for this Policy is JLP Policy DEV15. Suggest a criteria is added that covers the sustainability aspects of such proposals in terms of trip generation, accessibility for non car visitors etc.</p> <p>3 This site is not shown on the Proposals Map. Following a request for information it was stated that the assessment for this site was located in Appendix 1 although no plan illustrating the site appears in this document. It is suggested that this allocation, if included, is covered in a stand-alone Policy that sets out criteria against which development of the site will be gauged. It is suggested that the site assessment needs to be more comprehensive given the use proposed. Furthermore, there are concerns that the site is located well away from the main villages in a largely rural location not involving the conversion of existing buildings. I would suggest a full discussion with officers, prior to embarking on the work detailed above, in order that full consideration is given to the suitability of this proposal at this location.</p> <p>4 Suggest reference is made to JLP Policy DEV14, linked to Paragraph 5.9 to 5.13 of the JLP Supplementary Planning</p>	<p>1. Agreed. Criterion b will be amended as follows: "... safe and adequate access and parking, avoids significant increase in the use of the private car and facilitates sustainable transport where appropriate".</p> <p>The site (site 30) will be shown on the Proposals Map. The proposal aims to help reduce car journeys by providing employment where people are already working. Barkingdon is already an existing industrial area, but the existing facilities do not allow for the growth that the existing business requires and the group would like the business to remain in the parish for the industrial health of the parish.</p> <p>4. Reference to JLP Policy DEV14, and paras 5.9 to 5.13 of the JLP SPD will be added to the plan.</p>

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	Document 2020, which set out details of the marketing test that applies through the JLP. Any deviation from this will require justification.	
POLICY SNP7: REUSE OF REDUNDANT FARM BUILDINGS	As with Policy SNP6 1 suggest JLP Policy DEV 15 is used as a basis for reworking the Policy wording.	The amendment to criterion b of clause 1 of Policy SNP6 will be referenced from Policy SNP7, although the policy ought to refer to "the requirements of Policy SNP6 clause1" (not Policy SNP5) and will be amended accordingly.
POLICY SNP8: BROADBAND AND TELECOMMUNICA TIONS INFRASTRUCTURE	The Council have issued a standard Policy to be used by NPGs in formulating Broadband Policies. Suggest this is used in conjunction with this Policy and SNP4 7 to formulate a single Policy for the Staverton NP. NB A copy of this document is enclosed.	<p>SHDC's standard policy is robust and suited to local circumstances. The draft policy will be augmented by the version recommended by SHDC, as follows:</p> <ol style="list-style-type: none"> 1. Proposals to expand mobile phone coverage, electronic communications and broadband networks are encouraged and will be supported providing apparatus is kept to the minimum necessary for efficient operation. 2. The plan will seek on site infrastructure to support the installation of, and allow the future upgrade and maintenance of, fibre optic broadband technology. <ol style="list-style-type: none"> i. All development is required to submit a connectivity statement to set out the proposed broadband provision. The statement shall include which broadband supplier(s) can provide full fibre or fixed wireless coverage to the development to provide gigabit capable broadband provision.

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		<ul style="list-style-type: none"> ii. On sites of 10 dwellings and over and on all non-residential sites, all new properties must be served with an appropriate open access gigabit capable fibre optic infrastructure to enable high speed and reliable broadband connection in accordance with national and local objectives to increase coverage. iii. On sites of under 10 dwellings all new properties shall be served with an appropriate open access fibre optic infrastructure to enable high speed and reliable broadband connection unless there is evidence which demonstrates that providing the required infrastructure is not feasible or economically viable. iv. Installed infrastructure should allow all premises that form part of the approved development to access superfast or better broadband prior to occupancy. v. The creation of a building to act as a fibre hub to enable fibre connections within the area will be supported.
6: Design and Heritage		
POLICY SNP9: DESIGN AND CONSTRUCTION	b) Most groups go with a policy requirement that developments meet Government requirements whilst encouraging exceedance. As it stands this clause includes	Clause b will be amended to read "target zero carbon, at least meeting government standards for sustainable construction, minimising use of... "

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	<p>requirements that would be difficult to gauge and measure for the decision maker.</p> <p>c) This clause is difficult to understand.</p> <p>h) The JLP Supplementary Planning Document 2020 sets out car parking standards for the Local Plan area. Any deviation from those standards should be fully justified. If you are content with those standards then no need to mention in the Policy.</p>	<p>The group does not agree that clause c is difficult to understand but will split it into two in order to assist clarity (one clause dealing with the use of stone and the other with planting)</p> <p>The plan will be amended to require the standards set out in the SPD (1 bed dwellings 1 space, 2 and 3 beds 2 spaces, 4 beds 3 spaces).</p>
POLICY SNP10: HERITAGE AND CONSERVATION	<p>1 There is no need to refer to Designated Assets since National/Local Policy adequately deals with their protection. As for Non Designated Assets, paragraph 6.7 identifies some. Most Groups produce a list which is presented in the Policy itself or as an Appendix. It is noted that one Regulation 14 consultee suggested there were additional structures that could be considered for inclusion. It is suggested that a list is compiled and consulted on before Regulation 15 submission.</p> <p>2 This is difficult to understand and translate into action for developers and decision makers.</p> <p>3 See comments on 1) above.</p> <p>NB Historic England have raised a number of concerns in</p>	<p>Clause 1 will be amended to remove reference to designated assets and to list undesignated assets (which are also listed at para 6.7) with the addition of Penn Rea and Bumpston Bridge, which were brought forward in response to pre reg-14 consultation. The group do not see the necessity for a further consultation.</p> <p>The words "maintain the spaces between buildings and..." will be deleted from clause 2.</p> <p>Clause 3 will be deleted and the closing sentence added to the end of para 6.8 rather than included in the policy.</p>

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	regard of Heritage matters these are not repeated in full in the Council's comments.	
7. Natural Environment		
POLICY SNP11: LANDSCAPE AND BIODIVERSITY	<p>2 This clause is gives prominence/priority to certain features which may have the effect of “down grading “ features of equally high importance that are not identified.</p> <p>4 National Policy defines the best and most versatile land as falling in grades 1,2,3 and 3a.. Suggest the removal of 3b form this Policy.</p>	<p>The features listed are deliberately intended to be highlighted. It is unclear what other "features of equally high importance" SHDC fears will be "downgraded".</p> <p>This point is accepted. Reference to grade 3b land will be deleted from the policy.</p>
POLICY SNP12: TRANQUILLITY AND DARK SKIES	Suggest reference is made to adopted NPs that have included a Dark Skies policy. The Policy as currently written would be difficult, if not impossible, to enforce.	The policy will be amended to remove the specifications that lighting should not be above 800 lumens and should illuminate only in response to motion sensors.
8. Transport and Communications		
POLICY SNP13: TRAVEL AND TRANSPORT	<p>1 It is suggested this paragraph is reviewed and split into those requirements that will be expected from new development and those that can only be encouraged. In terms of car parking requirements see comments on SNP9 h.</p> <p>2 Suggest only appropriate development should be expected to contribute towards improvements.</p>	<p>The policy will be redrafted along the suggested lines, to read as follows:</p> <p>1. New development will be required to maintain or improve highway safety, make appropriate provision for pedestrians and cyclists, and include car parking which at least meets the requirements set out in the adopted JLP's SPD.</p> <p>2. Proposals which integrate and connect well with social, community and green infrastructure will be welcomed.</p>

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	3 As indicated in the comments on SNP1.3 this issue should be discussed with the Highway Authority.	3. Wherever appropriate and directly related to the development, proposals are also encouraged to: a) include improvements to local footpaths, cycle-paths (including the National Cycle Network) and green lanes, b) maintain or enhance local public and community transport services, c) incorporate electric car charging points, and d) assist in the reduction of traffic speeds in the villages.
9. Energy Efficiency and Flooding		
POLICY SNP14: RENEWABLE ENERGY	<p>1 I don't believe you can limit the use of power generated to the Parish.</p> <p>3 Whilst this is likely the case no evidence is presented to uphold this claim. I would suggest reference to JLP Policy DEV34 this may obviate the need for this paragraph.</p>	<p>1. Remove “..where the purpose is to generate power for use within the parish and ...”</p> <p>3. Para 9.6 of the plan already makes reference to the JLP. Amend this to add specific reference to JLP policy DEV34 as suggested and delete clause 3 of the NP policy.</p>
POLICY SNP15: ENERGY IN NEW DEVELOPMENT	The Government Standards for new development are set in the Building Regulations. It is possible to encourage exceedance but not insist upon it. It is suggested this Policy is reworded with this in mind.	Replace the word "should" by the words "are encouraged to ...".
POLICY SNP16: SUSTAINABLE DRAINAGE	Suggest the Environment Agency are consulted upon the content of this Policy.	The EA were among Reg 14 consultees but raised no comment.
10. Delivery and Monitoring		
No comments		
Other Issues		

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		Some respondents to the Regulation 14 Consultation have raised issues relating to a Prior Approval and Consent issued by the Council in respect of Whyteways Farm (Code Nos 0146/18/FUL and 50/2308/15/PNNEW). Please seek clarification from Council officers if required.
Comments on Housing Strategy	<p>Both the JLP and the Housing Needs Survey recognise the need for more housing, and particularly more affordable housing, in the Staverton Parish. This is reflected in the objectives and aspirations identified in the Draft NP. Despite this the NP makes only two allocations in Landscope/ Woolston Green aimed at addressing the JLP Indicative figures/affordable housing issues. The Beara Farm allocation (14 dwellings) which recently obtained planning consent and Landscope/Woolston Green allocation (6 dwellings) on a site that could accommodate substantially more dwellings. This latter allocation appears simply to have been made, at the quantum proposed, to meet the JLP Indicative figure.</p> <p>No allocations are proposed for Staverton. The NP and Appendices 1 and 2 cite the constraint imposed by the Church of England Covenants creating a lack of financial incentive for owners to put forward their sites at least during the period of the NP. No clear, definitive evidence has been advanced in the NP locating sites affected by the Covenants nor has this constraint been considered, apart from general comments, as part of the site assessment process.</p>	The assessment of individual sites was carried out without reference to the existence of the covenants. It therefore provides a useful basis for the consideration of the suitability of sites which might be brought forward as covenants expire. Most land in the Parish was previously owned by the Church Commissioners and we are aware that all land sold by them is covered by financial covenants of some kind. The group is advised that such a map does not exist and does not feel in a position to ask to see legal proof.

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	<p>As such the NP places a reliance on exceptions sites (Policy SNP5) to, on face value, fill the gap. The NPG's attention is directed to two factors that could impact on the number of house that could potentially arise if the NP proceeds as it stands</p> <ol style="list-style-type: none"> 1. The JLP Indicative Figure for Staverton could be met by a speculative development outside the Settlement Boundary (but well related to the village) which would only be required to provide 30% affordable housing. 2. With a housing need identified in the NP of 19 and applying the JLP 60% affordable /40% market rate of provision, the number of house that will actually be built will be greater than the number of affordable house required. The market housing proportion is necessary to enable viable projects whilst providing some incentive to release land on these terms. <p>Although the potential outcomes have been set out in the starkest terms this illustrates that substantial risk may arise from speculative proposals if the NP does not seek to actively address the JLP Indicative/affordable housing issues.</p> <p>In summary it is considered reliance on exception sites to fulfil JLP requirements is inappropriate and that the allocations that have been proposed do little to address the very real affordable housing issues that exist in the</p>	<p>It is considered that the restrictions imposed by the covenants leave no options open in and around Staverton village during the plan period and that the risks highlighted by SHDC are therefore minimised.</p>

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	Staverton Parish.	
The Draft Neighbourhood Plan Evidence Base		
Appendix 1: Site Assessments	<p>There are concerns (also expressed by some Regulation 14 consultees) regarding the content of Appendix 1-Site Assessment which may be summarised as follows:-</p> <ul style="list-style-type: none"> • There appears to be a mismatch between sites assessed and the number of sites identified on the Plan labelled “<i>Sites which have been assessed</i>”. • Sites have not been numbered and labelled on the Plan. • No clear explanation is given on how the “<i>Staverton NP Site Scoring Matrix</i>” (pages 64/65) was compiled nor how the differences in scoring between Lee Bray and the Group arose. • Both Natural England and Historic England have questioned the sources used in the Site Assessments. • Sites 8,13 and 15 have been identified as “Overall Very Good” and “Understood to be available” . Why have these been dismissed from consideration? 	These points will be addressed while the group consider amendments to the draft plan.
Appendix 2: Evidence Paper to support approach taken to making development site	I set out below the comments on housing strategy supplied to the Group prior to publication of the Regulation 14 Version of the NP. Whilst these comments pertain to a wider approach to housing allocation than proposed in the current version of the NP they do	The evidence paper sets out the group’s endeavours to find a suitable and locally distinctive way to accommodate the JLP’s provisions for the parish and meet local housing needs.

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proposals	<p>encapsulate the Council’s position on where best to concentrate efforts to meet JLP requirements and affordable housing need:-</p> <p><i>“Whilst accepting the historic context to the distribution of houses is specific to the Staverton Parish, I am not sure that the distribution of houses differs greatly from other Parishes in the vicinity or indeed from rural parishes in South Hams as a whole. It is usual that “sustainable village(s)” exist alongside smaller hamlets or groups of houses with a historic raison d’etre. JLP policy is, in a nutshell, aimed at encouraging the concentration of required development in those “sustainable villages” as explicitly stated in the JLP’s justification for this approach (see JLP Policies TTV1, TTV2 and TTV25). A move away for this requires very specific robust justification. I do not believe the historic developments patterns exhibited by Staverton Parish provide such a justification.</i></p> <p><i>I do, however, accept that Staverton (the settlement) does exhibit issues that are unusual:-</i></p> <ol style="list-style-type: none"> <i>1. I concur with the view that the Staverton settlement is of two parts with the greater concentration around the Church and Pub but also around Staverton Bridge. I believe this gives opportunities to consider development opportunities at these locations and between them.</i> <i>2. Much play has been made of the covenanted</i> 	<p>The circumstances prevailing (most particularly the existence of the covenants), set against SHDC’s view that development must be concentrated in sustainable settlements (Staverton and Woolston Green) have made it impossible to meet the JLP’s provisions for Staverton village.</p> <p>The evidence paper aims to describe the lengths the group has gone to and explain the position set out in the plan.</p> <p>There is no support within the parish for considering Staverton Bridge a second centre in Staverton.</p> <p>As stated above, the group does not feel in a position to</p>

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	<p><i>land which disincentivises owners from early land release. I have asked for (but have not received as yet) a plan showing the extent of this land. I need this to appreciate the full nature of this issue.</i></p> <p><i>I have raised strong concerns regarding the dispersal strategy which are well documented. As indicated already in my email I do not believe the justification provides specific and tenable reasons why developments at, for example Memory Cross and Beara, should be allocated. Furthermore, despite my making contact with Shropshire regarding the single plot exception policy, I have had no justification as to why this is necessary in the Staverton NP against the existing provisions in JLP Policy TTV27; nor why the Staverton Parish so differs from other S Hams parishes that it is required. I do not believe, in any event, relying on this proposed policy alongside dispersed development will, with any certainty, meet the JLP Indicative and local housing needs. Furthermore, the provisions of JLP Policy 27 and the proven housing need could, if the NP does not meet the JLP Indicative and ensure the provision of affordable properties, lead to speculative planning applications with outcomes less favourable than robustly justified allocations in the NP. I accept making such allocations is difficult against the backdrop of the expressed wishes of the local community. I would suggest, however, that these issues alongside the</i></p>	<p>ask to see legal proof.</p> <p>The plan no longer proposes a dispersal strategy. It allocates such sites as are suitable and available and includes policies which are aimed at otherwise helping to encourage housing needs to be met in other ways.</p>

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	<i>potential consequences, if allocations do not meet the JLP requirements, are fully explained by the Group to parishioners and discussed with them as part of the process of addressing the housing allocation conundrum.”</i>	
Strategic Environmental Assessment/Habitat Regulations Assessment (SEA/HRA)	<p>It became apparent to the Council, whilst preparing the SEA/HRA Screening Opinion that, as a result of the allocations proposed (apart from the Beara Farm allocation: SNP 1a), that Strategic Environmental Assessment may be required in respect of the potential Heritage impacts that may arise. I would suggest, in the first instance the advice of Historic England is fully considered and addressed. This may obviate the need for full SEA.</p> <p>In terms of HRA, Appropriate Assessment is certainly required given the location of the above mentioned allocations in relation to the South Hams SAC.</p> <p>This information has already been relayed to the Staverton Group and it is understood that moves to address the issues raised are being made. Please contact Duncan Smith if further information or assistance is required.</p>	The group have applied to Locality for a grant for Aecom to carry out SEA or HRA.
Conclusion	The Staverton Neighbourhood Plan seeks to manage development within a sensitive landscape, whilst enabling small-scale organic development that meets the priorities	

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	<p>and needs of the local community. The broad aspirations of the plan are consistent with adopted and emerging local policy.</p> <p>It is clear that a great deal of work has been undertaken to bring the Plan to this stage of the Neighbourhood Planning process. The draft plan is well presented with good illustrations and clear plans and graphics.</p> <p>As is clear, however, from the comments presented above the Council have significant concerns regarding the Housing Strategy proposed in the Draft Neighbourhood Plan.</p> <p>SHDC considers, however, that the draft Staverton Neighbourhood Plan can be brought into compliance with local policy and national guidance subject to the advice and guidance provided being followed and would welcome dialogue with the NP group to help achieve this.</p>	<p>The group hopes that the justifications given and amendments to the plan which are proposed will overcome SHDC's concerns.</p>