

**Draft LDF Briefing Paper – Structure Plan v RSS v LDF Policy Schedule**

Devon Structure Plan Policy (Adopted Oct 2004) (a)	Related Policies in Regional Spatial Strategy for South West (Final Draft - April 2006) (b)	DCC Comments on extent to which Structure Plan Policies are incorporated in RSS and need to be saved beyond Oct 2007 plus issues to be resolved (c)	SP Policies to be saved beyond Oct 2007 through the Regional Assembly (d)	Structure Plan Policies reflected in Draft in RSS plus issues still to be resolved (e)	Structure Plan Policy/Proposals that need be saved at LDF level to ensure there is no strategic policy void and the Structure Plan Policies that need to be taken into account in preparing LDF's (f)	Structure Plan Policies to be saved beyond Oct 2007 through LPA DPS (g)	Structure Plan Policies to be taken into account in preparing LDF (h)
ST1 Sustainable Development	SD1 Ecological Footprint SD2 Climate Change SD3 Environment and Natural Resources SD4 Sustainable Communities	RSS policies cover general principles articulated in ST1  RSS policies better relate to headline themes (e.g. climate change, sustainable communities).	➡	➡	All elements of DSP Policy ST1 Sustainable Development Objectives need to be reflected in LDFs	➡	➡
ST3 Self Sufficiency of Devon's Communities	D Infrastructure for Development SD4 Sustainable Communities	SD4 demonstrates link to self-sufficiency  Policy D refers to mix of uses, infrastructure provision and priorities for investment	➡	➡	Self-sufficiency of communities needs to be clearly articulated in LDFs	➡	➡
ST4 Infrastructure Provision	D Infrastructure for Development SD4 Sustainable Communities	Appropriately covered by RSS  Important that Supplementary Planning Documents are prepared to secure new arrangements for infrastructure funding (as indicated in RSS Policy D). It is suggested that the RA be requested to clarify if such advice should be area specific or region specific and advise who should be responsible for coordination such work so as to avoid duplication of work, or conflicts of approaches between authority areas.	➡	➡	Important that SPG is prepared by RA to secure new arrangements for infrastructure funding. In the meantime suggested that that LDFs save and reflect need for development contributions	➡	➡
ST5 Development Priority 2001 to 2016	A Development at Strategically Significant Cities and Towns (SSCT) B Development of Market Towns C Development of Small Towns and Villages	General thrust behind DSP Policy ST5 is covered in RSS within text under spatial strategy (Chapter 3), except Newton Abbot is not an SSCT  Latter element of DSP Policy ST5 ('development in countryside should be strictly controlled') is not included in RSS.  The issues of development is not strictly controlled in the Countryside in the RSS. DCC should raised matter in its response to the RA.	➡	?	Those elements of DSP Policy ST5 which have not been included in the RSS should be incorporated in LDFs, particularly those with SSCTs in their area.  Development in the countryside should continue to be strictly controlled through LDF policy and even more so in landscape and finite coastal areas, only development essential to the specific local needs of the area should be considered.	➡	➡
ST6 Plymouth Principal Urban Area	A. Development at Strategically Significant Cities and Towns (SSCT) SR32 to SR35 Western Peninsula	General strategic approach for Plymouth is set out in Policy SR32.  Less focus in RSS on economic diversification at Plymouth and more focus on economic stimulation than in DSP Policy ST6.  Stimulation of the economy should have regard to the need to diversify the economy and as such should be recognised by the RA	➡	?	Ensure Plymouth LDF addresses need for economic diversification	➡	➡
ST7 Plymouth Principal Urban Area Housing and Employment Provision	A. Development at Strategically Significant Cities and Towns (SSCT) SR35 Western Peninsula	No specific mention of Langage in RSS.  No specific policy in RSS which sets out employment provision for each district.  The issue of no specific policy in the RSS setting out employment provision should be raised in the DCC response to the RA to ensure that guidance to LPA is clear on this matter.	➡	?	Expect LDFs to set out employment and housing provision for different areas of their district.	➡	➡

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ST8 New Community at Sherford	SR35 Western Peninsula (sets out dwelling provisions for Sherford)  F Master Planning	RSS Policy F implies housing densities of 50 dph  In DCC response to the RA seek clarification about the justification and need for dwelling densities of greater than 50 dph.  Part of ST8 regarding avoiding the best agricultural land is not mentioned in Development Policy F  The issue of the need to avoid the use of significant areas of the best and most versatile land may need to be raised as an issue and be capable of accommodating further development beyond the plan period may need to be raised in DCC's response to the RA	➡	?	DSP Proposal ST8 should be included in South Hams LDF and a specific Sherford Area Action Plan	➡	➡
ST9 Barnstaple and Bideford Sub Regional Centre	Policy A Development at Strategically Significant Cities and Towns (SSCT) SR43 – Focus for development at Barnstaple	General principles of DSP ST9 included in RSS  In view that Policy A and SR43 does not make any specific reference to Bideford (although it does in the text), DCC may wish to request that specific in their response to the RA that reference to the role of Bideford/Northam having a complementary role to Barnstaple should be included in the Policy SR43.	➡	?	DSP Policy ST9 should be included in significantly more detail in North Devon LDF	➡	➡
ST10 Exeter Principal Urban Area	Policy A Development at Strategically Significant Cities and Towns (SSCT) SR15-18 Exeter area related Policies SR1 – Relates to north and central area including Exeter SSCT	All elements of DSP ST10 covered by RSS	➡	➡	SPP / RSS Policy will need to be taken into account by the LPA in the preparation of their LDF	X	➡
ST11 Exeter Principal Urban Area Housing and Employment Provision	Policy A Development at Strategically Significant Cities and Towns (SSCT) SR15-18 Exeter area related Policies	No specific policy in RSS which sets out employment provision for each district.  The issue of no specific policy in the RSS setting out employment provision should be raised in the DCC response to the RA to ensure that guidance to LPA is clear on this matter.	➡	?	Expect LDFs to set out employment and housing provision for different parts of their district.	➡	➡
ST12 East Devon New Community Proposal	Policy F Master Planning SR16 – Set out provision for Cranbook as 6,500 dwellings by 2026 (plus possible extension)	RSS Policy F implies housing densities of 50 dph  Part of DSP ST12 regarding avoiding the best agricultural land is not mentioned in RSS Policy F or SR16 may need to be raised in DCC response to the RA	➡	?	DSP Proposal ST12 should be included in East Devon LDF and more detailed proposals included in a joint area action plan with Exeter City Council.	➡	➡
ST13 Torbay Principal Urban Area	SR32 – Western Peninsula emphasis on SSCTs (Torbay) SR36 – Range of employment opportunities, service and facilities SR37 – Make provision for 11,700 jobs and 500 dpa TO1 – Sustainable Tourism TO2 – Safeguarding Investment in Tourism Destinations	Not as much detail in RSS policy on issues of economic restructuring and tourism at Torbay Also no specific mention of the proposed Kingskerswell Bypass, although reference is made in the text to public transport, rail and road improvements to the Torbay/Newton Abbot Corridor The issue of no specific policy in the RSS relating to the Kingskerswell Bypass should be raised in the DCC response to the RA to ensure that guidance to LPA is clear on this matter	➡	?	Those elements of ST13 which have not been included in the RSS must be incorporated in LDFs.  Torbay LDF needs to address need for cross-border linkages with Devon LTP and neighbouring authorities' plans and programmes.	➡	➡

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ST13a Newton Abbot Sub Regional Centre	Policy B – Development of Market Towns SR19 – Newton Abbot primary focal point for development in Teignbridge.	Parts of Policy ST13 are not included in SR19, particularly section on need for sustainable transport links and an increased range of higher order services and facilities at Newton Abbot.  Newton Abbot is not included as one of the 22 SSCTs in Policy A	➡	?	Those elements of ST13a which have not been included in the RSS (e.g. sustainable transport, self-sufficiency, economic development) must be incorporated in Teignbridge LDF and Newton Abbot Area Action Plan.	➡	➡
ST15 Area Centres	Policy B – Development of Market Towns	General thrust of Policy ST15 regarding Area Centres is included in RSS Policy B under the heading of 'market towns'.  Policy B for Market Towns does not reflect ST15's requirement for towns to be of sufficient scale to support a range of services and facilities, to take account of their location relative to other settlements or be accessible to the Strategic Road Network.	➡	?	The general thrust of ST15 regarding the identification of Area Centres (Market Towns) should be taken into account in identifying the settlements concerned.  The issue of whether Cranbrook and Sherford are appropriate for identification as Market Towns, bearing in mind their proximity to Exeter and Plymouth will need to be resolved.	➡	➡
ST16 Local Centres and Rural Areas	Policy C – Development in Small Towns and Villages	Policy C about development in small towns and villages applies to all small towns and villages, by setting out the criteria where development might be appropriate.  In comparison to SP Policy ST16, a) there is no specific requirement in the Policy C for LPA to identify the settlements, and b) nor the potential for small-scale development outside local centres to support local regeneration is not specifically mentioned in Policy C. These are issues the DCC may wish to raise with the RA in their response to the document	➡	?	The general thrust of ST16 regarding the identification of Local Centres (small towns and villages) should be taken into account in identifying the settlements concerned.  LDFs should make provision for for small-scale development outside local centres to meet local needs and support regeneration objectives, bearing in mind the that development in the open countryside particularly for housing, should be strictly controlled in accordance with national guidance and other policies in the Structure Plan and Draft RSS.	➡	➡
ST17 Housing and Employment Land Provision	HD1 Sub Regional Distribution of Housing 2006 to 2026 HD2 Phasing of Housing Development and ensuring land supply	Overall distribution of housing in South West is shown in Tables 4.1 and 4.2 of RSS.  No specific RSS policy provides the employment land allocation per district.	➡	?	LPAs should set out in their LDFs housing and employment allocations for different parts of the district.  LDFs should include separate housing and employment land policies	➡	➡
ST18 Affordable Housing	H1 Affordable Housing HD1 Sub Regional Distribution of Housing 2006 to 2026 HD2 Phasing of housing development and ensuring land supply	H1 sets out the affordable housing provisions (i.e. between 30 and 60%) Policy HD2 sets out need for LPAs to undertake Housing Market Assessments	➡	➡	Ensure affordable housing policies/provision in LDFs are based on a thorough assessment of local need	➡	➡
ST18a Mix and Type of Housing	SD4 Sustainable Communities	RSS Policy SD4 describes need for a 'range and mixture' of house types in sustainable communities	➡	➡	ST18a needs to be included within LDF housing policies.	➡	➡

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ST19 Strategic Development Site	E1 Assessing Employment Land Provision E2 Identification of Employment Sites A, Development at SSCT D Infrastructure Development E High Quality Design SR16 Makes provision for 40 ha in Exeter and 100ha adjacent to Exeter SR35 Make provision for 150 ha within or adjoining Plymouth	SR16 and SR25 make set out specific requirements for employment land provision in the Exeter and Plymouth areas. The is no specific policy on strategic development sites in RSS. RSS has a sectoral review approach that responds to the needs of the economy.  Policy E2 requires LDD to provide for to accommodate the number of jobs in SSCT need for a range of employment sites  There is no specific policy in the RSS to identify strategic employment sites to reflect those in SP Policy ST19. RSS Policies set out the job provision and in SR16 and SR35 make provision for employment land provision at the Plymouth and Exeter. It is suggested that the RA be requested to: a) clarify the relationship between the job and employment land to ensure that the guidance to LPA is clear on this matter.	➡	?	Detailed policies regarding strategic employment sites should be included in LDFs for those LPAs which have such a site (e.g. SHDC have Langage)	➡	➡
ST 20 Re-assessing and Safeguarding Employment Land	E1 Assessing Employment Land Provision E4 Redevelopment of Employment Sites <b>E5 Waterside Employment Sites – safeguarded for social and economic uses</b>	Re-assessing employment land is a statutory requirement under PPG3 and PPG4  RSS does not include an overall requirement for 'safeguarding/reservation of suitable employment land and premises for that use' but does include Policy E5 for safeguarding waterside employment sites.  It is suggested that the RA be requested to include a policy that recognises that; 'Subject to the reassessment of employment land to test whether the land is necessary to meet the area's current and longer term employment needs, employment land and premises should be safeguarded for that use.'	➡	?	The reassessment and safeguarding of employment land set out in Policy ST20 should be incorporated in LDFs	➡	➡
ST21 Regeneration Priority	'Statement of Priorities'	Regeneration is covered by specific policies for each of the larger settlements and the Market Town (Policy B) in the RSS.  RSS fails to address the regeneration needs of in smaller settlements and rural areas. Suggest these would be more appropriately dealt with in LDF's	➡	?	The elements of DSP Policy ST21 should be incorporated in LDFs	➡	➡
Policy ST23 Concept of New Community Development	SD4 Sustainable Communities E High Quality Design F Master Planning G Sustainable construction RE5 Renewable Energy and New Development	All different elements of ST23 are covered in RSS but through a combination of separate policies. The RA should be asked to should be asked to make appropriate reference to Environmental Impact Assessment.	➡	?	Affected LPAs should include policies on new communities and a detailed AAP on each new community in their LDFs.	➡	➡

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Policy ST24 New Community Implementation	D Infrastructure for Development F Master Planning	RSS Policy D and F does not reflect DSP Policy ST24 requirement for: a) each phase of development to be 'self-sufficient' or b) be subject to specific agreements between the developer and LPA so as to ensure the provision of infrastructure, the full implementation of the development and the phasing programme  The RA should be asked to should be asked to make appropriate reference in new community policy to ensure that: a) each phase of development to be 'self-sufficient' b) be subject to specific agreements between the developer and LPA so as to ensure the provision of infrastructure, the full implementation of the development and the phasing programme	➡	?	Those elements of DSP Policy ST24 which have not been included in the RSS should be incorporated in LDFs		
Policy ST25 New Community Landscape Setting	F Master Planning	RSS policy makes no reference to LDD including policies to ensure that the new communities retain a separate identity and do not coalesce with existing settlements.  The RA should be asked to should be asked to make appropriate reference in new community policy to LDD including policies to ensure that the new communities retain a separate identity and do not coalesce with existing settlements.  (Check with JK/GB if this advice is still appropriate being in mind that additional provision is being proposed in the new communities)	➡	?	Those elements of DSP Policy ST25 which have not been included in the RSS should be incorporated in LDFs	➡	➡
CO1 Landscape Character and Local Distinctiveness	ENV2 Landscape Character Areas	Broadly covered in RSS.  The policy wording indicates that 'Local Planning Authorities should undertake assessments of landscape character at a strategic level and in partnership with adjoining authorities.....' The RA should be asked to clarify what is meant by 'at a strategic level' and which LPA should be responsible for undertaking the assessment?.	➡	?		➡	➡
Policy CO2 National Parks	ENV3 Protected Landscapes	Appropriately covered in RSS  Need to check if there is any requirement in the NP to promote the understanding and enjoyment of the special qualities	➡	➡	Expect more detailed Policies on National Parks in relevant LDFs.	➡	➡
Policy CO3 Areas of Outstanding Natural Beauty	ENV3 Protected Landscapes	Appropriately covered in RSS.  ENV3 includes a reference to promote the understanding and enjoyment of the special qualities of the AONB. Suggest RA need to clarify: a) that this is only applicable in areas where there is a Conservation Board. b) it Does this also apply to NP?  Also request clarification of any boundary reviews will need to be undertaken to reflect Landscape Character Assessment Approach.	➡	➡	Boundary details will need to be included in LDF for information together with reference to SP/RSS policy.	➡	➡

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CO4 Areas of Great Landscape Value	ENV1 Protecting and enhancing the Regions Natural and Historic Landscape ENV2 Landscape Character Areas	RSS does not include a policy to the special quality and character of the designated Areas of Great Landscape Value. Landscape quality is protected under ENV1 and there is a requirement under ENV2 to undertake Landscape Character Assessments  It is suggested that the RA be requested to include a policy to protect the special quality and character of the Areas of Great Landscape Value in Devon until such time the character approach to landscape protection is fully developed. (this reflects the Panel's advice when the matter was considered at the Structure Plan EiP in June / July 2003)	➔	?	Those elements of DSP Policy CO4 which have not been included in the RSS should be incorporated in LDFs	➔	➔
CO5 Coastal Preservation Area	CO1 Defining the Coastal Zone CO2 Coastal Planning RE2 Coast Zone and Offshore Energy	RSS policy does not refer to 'Coastal Preservation Area' but refers to the need to define a 'Coastal Zone' for the developed and undeveloped coast and that within the undeveloped coast there would be a presumption against certain types of development reflected in SP Policy CO5. It would appear that there would be a presumption against proposals for agricultural or forestry, but support for the sustainable management of fisheries. In addition RE2 require the identification to enable appropriate landfall to accommodate offshore energy production.  It is suggested that the RA be requested to clarify: a) their definition of the criteria that would should to be taken into account in defining the coastal zone, and if separate zones should be identified for the developed coast and the undeveloped coast, having regard to the fact that the second paragraph only refers to the undeveloped coast b) if the omission of agriculture and forestry from the list of exceptions was intentional c) the policy to be applied in the developed coast part of the Coastal Zone.	➔	?	The identification of the undeveloped part of Coast Zone and the developed part Coastal Zone of the of the will need to be define in LDD with reference to appropriate policies. At this stage it is proposed that the undeveloped element of the Coastal Zone concurs with the Coast Preservation area currently defined in Local Plans  See DCC Briefing ?? Note for future advice	➔	➔
Policy CO6 Quality of New Development	E High Quality Design F Master Planning SD3 Environment and Natural Resources SD4 Sustainable Communities ENV5 Historic Environment	RSS policies E and F require LPA to ensure all development delivers highest possible standards of design.	➔	➔	LPA should have statement in LDFs which reflects need for high quality development in their area	➔	➔

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CO7 Historic Settlements and Buildings	ENV5 Historic Environment	<p>Only partially covered in RSS. ENV5 indicates that the the historic environment will be preserved and enhanced. LA and other partners are required to identify and access the significance of the historic environment and to identify options for its sensitive management. (in effect this policy covers historic settlement, historic landscape and archaeology etc)</p> <p>It is suggested that the RA be requested:</p> <p>a) to also include reference to the need for historic environment to be 'conserved' as this term is more relevant to historic buildings and settlements, whereas preserved may be more appropriate to archaeological remains.</p> <p>b) to clarify those elements of the historic environment where special care should be taken to preserve or conserve and if necessary enhance the historic environment ( for example, historic character of settlements, conservation areas, historic character of the landscape, listed and other building, historic parks and gardens, archaeological sites and their settings</p> <p>Reference in para 7.2.14 to marine archaeological resources needing protection also needs to be clarified in terms of current planning responsibilities. There is currently no planning control below low mean tide level.</p>	➡	➡	<p>LA and other partners are required to identify and access the significance of the historic environment and to identify options for its sensitive management. Expect to see more detail on historic settlements and buildings in LDFs. See DCC Briefing ?? Note for future advice</p>	➡	➡
Policy CO8 Archaeology	ENV5 Historic Environment	<p>Only partially covered in RSS ENV5 indicates that the the historic environment will be preserved and enhanced. LA and other partners are required to identify and access the significance of the historic environment and to identify options for its sensitive management. (in effect this policy covers historic settlement, historic landscape and archaeology etc) There is no specific policy on Archaeology as set out in the Structure Plan</p> <p>Response as set out above.</p>	➡	➡	<p>LA and other partners are required to identify and assess the significance of the historic environment and to identify options for its sensitive management. Expect to see a more detailed policy on archaeology in LDFs.</p> <p>See DCC Briefing ?? for further advice</p>	➡	➡
CO9 Biodiversity and Earth Science Diversity	ENV 4 Nature Conservation	<p>Biodiversity element covered in RSS but the earth science element does not appear to be covered.</p> <p>Need to check</p> <p>a) if policy should cover earth science resource (geological conservation) or is it covered by ENV5</p> <p>b) if policy should use 'maintained and enhanced' or 'sustained and where appropriate enhanced'</p> <p>c) if reference to the need to ensure that 'diversity and distinctiveness should not be diminished'</p>	➡	?	<p>LA should use the Nature Map to help map local opportunities for biodiversity enhancement in LDD and priorities for enhancement in accordance with the Devon Biodiversity Action Plan. Expect to see a more detailed policy on Biodiversity and Earth Science in LDFs.</p> <p>See DCC Briefing ?? for further advice</p>	➡	➡

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CO10 Protection of Nature Conservation Sites and Species	ENV4 Nature Conservation	Nature Conservation sites and species Broadly covered in RSS. Need to check that the relevant elements are contained in RSS	➔	?	LA should use the Nature Map to help map local opportunities for biodiversity enhancement in LDD and priorities for enhancement in accordance with the Devon Biodiversity Action Plan. Expect to see a more detailed policy on nature conservation in LDFs. See DCC Briefing ?? for further advice	➔	➔
CO11 Conserving Energy Resources	SD1 Ecological Footprint SD3 The Environment and natural resources Policy G Sustainable Construction	General approach of CO11 is set out in RSS policies SD1, SD3 and G.	➔	➔	Expect LPAs to set out a strong policy/approach towards energy conservation in their LDFs See DCC Briefing ?? for further advice	➔	➔
Policy CO12 Renewable Energy Developments	RE1 Renewable Energy Targets 2010 and 2020 RE2 Coastal Zone and offshore energy RE4 Renewable Heat targets RE4 Meeting the targets through Development of new resouces RE5 Renewable Energy and New Development	Broadly covered in RSS Policy RE1 and RE4. Renewable energy target to 2010 consistent with that in the Policy CO12. However there is no mention of 'area of search for wind based energy production' It is suggested that the RA be requested to include a proposals map that that identifies broad areas that may be considered suitable for particular technologies (for example Areas of Search for wind based energy production based on assessment of wind based energy but avoiding areas landscape policy areas, renewable biomass, combined heat and power, generation from waste etc. .	➔	?	LDFs should exploit potential for renewable energy generation with new and existing developments LDFs should set out an "area of search" where renewable energy developments will be prioritised Include positive policies to achieve heat from renewable sources Set out polices for onsite renewable energy in connection with new development See DCC Briefing ?? for further advice	➔	➔
CO13 Protecting Water Resources and Flood Defence	RE6 Water Resources G: Sustainable Construction F1 Flood Risk	Broadly covered in RSS Policy RE6 and G and F1 but less specific. RSS does not cover potential for development to have an adverse impact on fisheries, river corridors and coastal margins. It is suggested that the RA be requested to recognise the potential for development to have an adverse impact on fisheries, river corridors and coastal margins.	➔	?	All elements of DSP Policy CO13 should be incorporated in LDFs See DCC Briefing ?? for further advice	➔	➔
CO14 Conserving Agricultural Land	No Policy	RSS does not include a policy to conserve the best and most versatile policy. Gov advice is set out PPS7. Para 29 implies it is a matter for inclusion in LDD.	➔	X	DSP Policy CO14 needs to be included in LDFs	➔	➔
CO15 Air Quality	RE9 Air Quality Policy G Sustainable construction	Broadly covered in RSS RSS Policy G emphasises need to reduce (air and light) pollution throughout buildings	➔	➔	DSP Policies CO15 and CO16 need to be included in LDFs See DCC LDF Briefing Note ?? for further advice	➔	➔
CO16 Noise Pollution	No Policy	The impact of noise in not considered in any RSS Policy. It is suggested that the RA be requested to include a policy to set out guidance about reducing and minimising exposure to noise whist protecting quieter area and areas of natural sound by controlling the growth of noise in both space and time (having regard to Noise Mapping and new European legislation)	➔	?			

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MN1 Safeguarding Mineral Resources	RE10 Supply of Aggregates and Other Minerals	Policy RE10 requires LPA /MPA to identify and collaborate in the safeguarding of mineral resources. (There is no specific reference to Mineral Consultation Areas)  Policy also includes need to promote bulky transfer of goods by rail and water plus safeguarding of opportunities  <b>Should reference be made to Mineral Consultation Areas</b>	➡	➡?	Mineral LDFs to set out meet contribution to national requirements and identify. MN1 included in Mineral and Waste LDF. Mineral Consultation Areas and for mineral deposits to be safeguarded on LDF Proposals Map.  Other LDFs to illustrate Mineral Consultation Areas of information  <b>See DCC LDF Briefing Note – Minerals for further information</b>	➡	➡
MN2 Environmental Effects of Mineral Working	No Policy	Not specifically included in any RSS policy.  No link in RSS between mineral working and landscape character preservation.	➡	X	Policy MN2 included in Mineral LDFs  <b>See DCC LDF Briefing Note – Minerals for further information</b>	➡	➡
MN3 Mineral Development in National Parks and Areas of Outstanding Natural Beauty	No Policy	Not specifically addressed by any RSS policy.	➡	X	Policy MN3 included in Mineral LDFs  <b>See DCC LDF Briefing Note – Minerals for further information</b>	➡	➡
MN4 Mineral Working Areas	No Policy	Not specifically addressed by any RSS policy.	➡	X	Policy MN4 included in Mineral LDFs  <b>See DCC LDF Briefing Note – Minerals for further information</b>	➡	➡
MN5 Aggregate Minerals	RE10 Maintaining a landbank for Aggregates RE11 Recycled	Broadly covered by RSS, although criteria has changed to cover a 7 year supply of all aggregates plus county apportionment.	➡	➡	Policy MN5 included in Mineral LDFs  <b>See DCC LDF Briefing Note – Minerals for further information</b>	➡	➡
MN6 Secondary and Recycled Materials	RE12 Recycled and Secondary Aggregates	Broadly covered by RSS  RSS does not address adverse transport and environmental impacts.	➡	➡	<b>Those elements of DSP Policy MN6 which have not been included in the RSS but incorporated in LDFs</b>  <b>See DCC LDF Briefing Note – Minerals for further information</b>	➡	➡
WM1 Waste Management	W1 Provision of Waste Sites W2 Waste Facilities and the Waste Hierarchy W3 Hazardous Waste W4 Controlling, Reusing and Recycling Waste in Development	Appropriately covered in RSS.	➡	➡	LDFs should include a requirement for major development proposals to be accompanied by a waste audit  <b>See DCC LDF Briefing Note ?? for further advice</b>	➡	➡
TR1 Devon Travel Strategy	SD1 The Ecological Footprint SD2 Climate Change SD3 The Environment and Natural Resources SD4 Sustainable Communities TR12 Regional Freight Map TR13 Rail Freight interchange facilities	Devon Travel Strategy is not specifically covered in an particular RSS policy but the elements are covered in RSS Policies SD1 to SD4.  <b>No identification of links to LTP</b> <b>Seek advice</b>	➡	➡	<b>DSP Policy TR1 should be included in LDFs</b>  LDFs should ensure integration with strategies and proposals in the Devon LTP  <b>See DCC LDF Briefing Note ?? for further advice</b>	➡	➡

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TR2 Co-ordinating Land Use / Travel Planning	TR1 Demand Management and Public Transport in the SSCTs SD1 The Ecological Footprint SD2 Climate Change SD3 The Environment and Natural Resources SD4 Sustainable Communities	Broadly covered in RSS No specific policy on 'accessibility planning' despite it being one of the four shared priorities with government for LTP. <b>Seek advice</b>	➔	➔ (?)	<b>DSP Policy TR2 should be included in LDFs.</b>  LDFs should ensure that 'accessibility planning' informs their LDF land use allocations. <b>See DCC LDF Briefing Note ?? for further advice</b>	➔	➔
Policy TR3 Managing Travel	TR1 Demand Management and Public transport in the SSCTs SD1 The Ecological Footprint SD2 Climate Change SD3 The Environment and Natural Resources SD4 Sustainable Communities	Appropriately covered in RSS, but weak on area outside SSCT's (i.e about ???% of the population)  <b>Seek advice</b>	➔	➔ (?)	<b>DSP Policy TR3 should be included in LDFs</b>  <b>See DCC LDF Briefing Note ?? for further advice</b>	➔	➔
TR4 Parking Strategy, Standards and Proposals	Parking strategies covered in text in Chapter 5 para 5.7.1 and 5.7.2	No specific car parking policy in RSS. <b>It is suggested that the RA be requested to set out the objective on which to base parking management strategies in SSCT's and smaller settlements and rural areas to meet to enable consistence of application across the region.</b> <b>Seek advice</b>	➔	?	<b>DSP Policy TR4 should be included in LDFs.</b> <b>See DCC LDF Briefing Note ?? for further advice</b>	➔	➔
TR5 Hierarchy of Modes	TR1 Demand Management and Public transport in the SSCTs SD1 The Ecological Footprint SD2 Climate Change SD3 The Environment and Natural Resources SD4 Sustainable Communities	Broadly covered in RSS <b>RSS TR1 doesn't mention PPG13's 'hierarchy of modes' or state what sustainable modes are.</b> <b>No linkages to Transport Assessments or LTP</b> <b>Seek advice</b>	➔	➔ (?)	<b>DSP Policy TR5 needs to be provided in more detail in LDFs.</b> <b>See DCC LDF Briefing Note ?? for further advice</b>	➔	➔
TR6 Network Integration	TR5 – Inter-regional Rail Network TR6 Inter- regional Bus and Coach Network	Incorporated in place-specific policies in RSS but only relates to the strategic transport networks, the RSS polices don't recognise the SRN or Branch line routes etc.	➔	➔ (?)	LDFs need to ensure DSP Policy TR6 is retained and details proposals included in LDD <b>See DCC LDF Briefing Note ?? ??? for further advice</b>	➔	➔
TR7 Walking and Cycling	Not specifically covered	No specific RSS policies address DSP Policy TR7. Supporting text does emphasise the need to achieve a sustainable modal split.  <b>Check that long distance footpaths and regional cycleways are covered by PROW policy.</b>	➔	X	<b>DSP Policy TR7 needs to be provided in more detail in LDFs.</b> <b>Integration with LTP strategies will be essential to ensuring higher levels of walking and cycling.</b> <b>See DCC LDF Briefing Note ?? ??? for further advice</b>	➔	➔

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TR9 Public Transport	TR5 Interregional Rail Network TR6 Intergrated Regional Bus and Coach Network TR10 Regional Connectivity TR11 Inter-regional public transport	Inter-regional public transport appropriately covered in RSS, the promotion of the use of transport in Devon is not set out in the terms of DSP Policy TR9	➡	➡ (?)	LDFs and LTP need to ensure DSP Policy TR9 is retained and details proposals included in LDD and LTP  See DCC LDF Briefing Note ?? ??? for further advice	➡	➡
TR10 Strategic Road Network and Roadside Service Areas	TR2 The M4 and M5 TR3 Second Strategic Route TR4 Remainder of Trunk Road Network	oThe RSS road network policies only contain proposal relating to the improvement of the Trunk Road Network .  The is nothing in the RSS about: a) the provision of roadside service areas on Trunk Roads and National Routes (although reference is made in para 5.6.4 refer to the need for LA/HA to review provision of rest areas for HGV on all routes) b) to indicate that development proposals should not adversely affect the road network in terms of traffic, road safety, and access to and from the road should not detract from or conflict with the function of the route.  It is suggested that the RA be requested to also recognise in a Policy the need; a) to maintain and enhance the Devon Strategic Network (as illustrated in the DSP) as regionally important route that are essential to support the spatial development strategy and the freight road network in the RSS. DSP b) to state that development proposals should not adversely affect the road network in terms of traffic, road safety, and access to and from the road should not detract from or conflict with the function of the route c) make provision of new and improved roadside service areas on Trunk Routes and National Primary Routes of the Strategic Road Network  Seek advice	➡	?	LDFs and LTP need to ensure DSP Policy TR10 is retained and detailed proposals are included in the LDD and LTP to recognise the need to: a) maintain and enhance the Devon Strategic Road Network, b) to indicate that development proposals should not adversely affect the road network in terms of traffic, road safety, and access to and from the road should not detract from or conflict with the function of the route. and c) make provision of new and improved roadside service areas on Trunk Routes and National Primary Routes of the Strategic Road Network.	➡	➡
TR11 Safeguarding Transport Networks	No Policy	(The is a reference in RSS Policy RE10 concerning the bulk transfer of minerals for existing railhead, wharfage and other handling facilities to be safeguarded.)	➡	X	DSP Policy TR11 needs to be incorporated in LTP / LDFs.		

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TR13 Ports	TR7 Ports E5 Waterside Employments Sites (safeguarding)	Broadly covered in RSS. RSS doesn't mention the names of ports with a strategic function  It is suggested that the RA be requested list the ports to which this policy applies (in the case of Devon: Plymouth as a commercial and fishing port linked to TENS, Teignmouth as a commercial port, Bideford as commercial port, and Brixham as a fishing port (LTP also makes reference to Ilfracombe as an example of a smaller port serving local functions))	➔	?	Expect LDFs and LTP to include more detailed policies and proposals on the roles and functions of ports in Devon.	➔	➔
TR14 Airports	TR9 Airports	Appropriately covered in RSS  (Check with RF if any other specific matters should be referred such as EU airport strategy and accessibility points)	➔	➔	Expect LDFs and LTP to include more detailed policies on the roles and functions of airports in Devon	➔	➔
TR15 Freight Distribution Network	TR12 Regional Freight Map TR13 Rail freight interchanges	Broadly covered in RSS. RSS doesn't mention need to develop comprehensive freight management strategies or need to implement freight quality partnership action plans  It is suggested that the RA be requested: a) to ensure that the routes illustrated on the Regional Freight Map reflect TENS and Devon County Councils Strategic Road Network as a number of routes for example the A377 between Crediton and Barnstaple is not recognised as part of the SRN. b) The freight map should also illustrate the rail network, and regional rail freight interchanges, airports and ports.	➔	?	Elements of DSP Policy TR15 not addressed in RSS need to be incorporated in LDFs and LTP.	➔	➔

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TR16 Travel Investment Priorities	No Policy	<p>Broadly covered in text in Chapter 5 of RSS.</p> <p>DSP Policy TR16 requirements for urban areas are picked up in place-specific policies</p> <p>(Policies SR15- 18 for Exeter)</p> <p>(Policies SR32-35 for Plymouth)</p> <p>(Policies SR36 – 37 for Torbay)</p> <p>The RSS does not set out any priorities in smaller settlements and rural area</p> <p>It is suggested that the RA be requested to set out travel investment priorities in smaller settlements and rural areas to provide appropriate guidance for LTP and LDD.</p>	➡	?	LDFs should ensure they set out their travel investment priorities, linked to LTP Area Strategies and place-specific RSS policies.	➡	➡
TR17 Strategic Network Investment Proposals	TR3 Second Strategic Route A303/A358 TR4 Remainder of trunk road network TR5 Inter-regional rail network improvements TR6 Inter-regional Bus and Coach Network TR7 Ports TR9 Airports	<p>No specific policy in RSS addresses strategic network investment priorities as such (, as it will be addressed through Regional Funding Allocation Bids )</p> <p>No specific policies of proposals identified in Devon relating to the Strategic Transport Investments (for example direct no mention of Kingkerswell Bypass)</p> <p>It is suggested that the RA be requested to set out a list strategic network investment priorities that that are considered necessary to implement the RSS to provide appropriate guidance to Regional Funding Allocation Bids, LTP's and LDD.</p>	➡	?	LDFs to seek advice from Regional Assembly regarding strategic routes in their area. Guidance should be included in the RSS	➡	➡
SH1 Shopping Facilities (Sequential Approach)	TC1 City and Town Centres – provision of Retail, Offices, Leisure and other town centre uses	<p>Sequential approach contained within national policy guidance (e.g. PPS6). (Should national policy be reiterated in the Development Plan in the same way as National Park Policy, AONB Policy etc – Check for authoritative advice on this matter)</p> <p>RSS Policy TC1 appears to reiterate the aspects of the development strategy but provides no clear strategic steer about locations where addition retail, cultural, office and leisure services need to ensure that the vitality and viability of the regions network of towns and cities are maintained and enhanced</p> <p>It is suggested that the RA be requested to provide a strategic steer about locations where addition retail, cultural, office and leisure services need to ensure that the vitality and viability of the regions network of towns and cities are maintained and enhanced clarify and those locations where national and regional important facilities are provided (for example opportunities for a National Weatherbased attraction at Exeter to build on the location of the Met Office, a Sailing Academy at Weymouth in Association with the Olympics, plus other Regionally important facilities such as a Regional Stadium/sport/swimming facility etc. )</p>	➡	?	LDFs should ensure they continue to follow the sequential approach advocated in Policy SH1.	➡	➡

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SH2 Shopping Facilities and Settlement Hierarchy	TC1 City and Town Centres – provision of Retail, Offices, Leisure and other town centre uses C Dev't in Towns & Villages	Partly covered in RSS RSS Policy TC1 appears to reiterate the aspects of the development strategy. Guidance in respect of the small towns and villages is reflected in Policy C.	➡	➡	Policy SH2 needs to be covered in more detail in LDFs	➡	➡
SH3 Retail Warehousing	No Policy	Retail warehousing is not specifically covered by RSS, but is covered by national planning guidance <b>(Need to check if Retail Warehousing is appropriately covered by National Planning Policy and whether there should be a Policy in a Development Plan)</b>	➡	?	Policy SH3 needs to be covered in more detail in LDFs	➡	➡
SH4 Shopping Facilities in Rural Settlements	No Policy C. Development in Towns and Villages	Policy SH4 is not specifically covered by RSS. However, Policy C does address the need to use existing premises and support key services.	➡	➡	Policy SH4 needs to be covered in more detail in LDFs	➡	➡
TO1 Tourism Development in Resorts	TO1 Sustainable Tourism TO2 Safeguarding and investing in Tourism TO3 New Major High Quality High Profile Attractions	Appropriately covered in RSS	➡	➡	DSP Policy TO1 needs to be covered in more detail in LDFs	➡	➡
TO2 Tourism Development in Other Settlements	TO1 Sustainable Tourism TO2 Safeguarding and investing in Tourism TO3 New Major High Quality High Profile Attractions	Appropriately covered in RSS	➡	➡	DSP Policy TO2 needs to be covered in more detail in LDFs	➡	➡
TO3 Tourist Development in Rural Areas	TO1 Sustainable Tourism	Principle partially covered in RSS policy TO1.	➡	➡	The detail of DSP Policy TO3 needs to be covered in in LDFs	➡	➡
TO4 Touring Parks and Camping Sites	No Policy	Not covered in a specific RSS policy.	➡	X	The detail of DSP Policy TO4 needs to be covered in more detail in LDFs	➡	➡
TO5 Major Recreation Facilities (and Golf Courses)	TO3 Major New High Quality, High Profile Attractions	Partially covered by TO3 of RSS but does not include reference that such development will only be provided outside Dartmoor National Park, AONB's, CPA and AGLV's	➡	X	The detail of DSP Policy TO5 needs to be covered in more detail in LDFs	➡	➡

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TO6 Long Distance Recreational Footpaths and cycle routes	No Policy	<p>RSS does not</p> <p>a) make provision for maintaining and extending long distance footpath, (bridleway?) and cycle networks and does not identify such routes on a Strategy Diagram</p> <p>b) Doesn't address need to integrate redundant canals and railways into a network of long distance footpath and cycle routes.</p> <p>It is suggested that the RA be requested to include policy to that</p> <p>a) Recognises the importance of the PROW networks and Open Land to the infrastructure, health and economy of Devon;</p> <p>b) Maintain and extend long distance footpath, bridleway and cycle networks and identify such routes on a Strategy Diagram</p> <p>c) Address need to integrate former or redundant canals and railways into a network of long distance footpath and cycle routes</p>	➡	?	Policy TO6 needs to be covered in more detail in LDFs	➡	➡

**New Policy areas addressed by the RSS (Final Draft April 2006) but not included above or specifically covered in the Devon Structure Plan (adopted Oct 2004) which may will need to be taken into account in the preparation of LDF's, if the policies are adopted in the RSS.**

Policy H	Re Using Land	Policy HE2	Provision of additional healthcare facilities
Policy I	Release, redevelopment and disposal of land	Policy HE3	Health Impact Assessment
Policy J	Joint Working	Policy SK1	Facilitating Access to Skills and Training
Policy H2	Housing Densities (exceed 30 dph, average 40 dph, SSCT's at least 50 dph)	Policy LCF1	Cultural Facilities
Policy GT1	Assessment of Need for Gypsy and Traveller Accommodation Requirements	Policy GI1	Green Infrastructure
Policy CS1	Planning for Community Facilities	Policy C1	Regional and Sub Regional Cultural Infrastructure
Policy HE1	Planning for Heath Care	Policy RE7	Sustainable Land Management (characterised by farmland, woodland and forestry)
		Policy RE8	Woodlands and Forests

LDF Briefing Paper - Structure Plan v RSS v LDF - Policy Schedule.DOC  
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