

**Tables of main points made through BUAB consultation (07/08/15 to 21/09/15)
listed by question with officer response where appropriate.**

NB. The tables in this document do not detail all the responses received; they summarises the main points raised where a response is appropriate and do not record, for instance, support for individual criteria. Representation numbers are attributed to each comment and a table giving names for the representation numbers is included at the end of this document. A full list of comments received may be viewed at [Consultation on proposed criteria for reviewing built-up area boundaries - East Devon](#)

Question 1: ‘are the criteria set out in Table 2 for defining BUABs the correct ones?’

Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 1 about criteria for defining BUABs	Officer Response
3215, 7885, 7285,	A1	Villages should be allowed to expand to support sustainable growth	The criterion is consistent with the strategic policies of the recently adopted local plan.
6299, 7296	A1	Not seeking expansion of BUAB's conflicts with the NPPF	The NPPF requires local plans to deliver the homes needed in their area. The recently adopted local plan sets out how this is to be achieved in East Devon and does not rely on additional housing allocations being made in the 'Strategy 27' settlements. The proposed criteria A1 is consistent with this policy and with the NPPF.
6299, 7284	A1	Not seeking expansion of BUAB's is premature until the outcome of the Local Plan.	This issue has been resolved through the adoption of the local plan.
7171, 7286, 7296, 7284	A1	Onerous criterion that lacks flexibility to accommodate growth on sustainable sites.	This issue has been resolved through the adoption of the local plan.
7171	A1	Sustainable growth is needed at the small towns and larger villages so that they continue to thrive.	This issue has been resolved through the adoption of the local plan.

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Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 1 about criteria for defining BUABs	Officer Response
7236	A1	In sentence in brackets delete “affordable” and just say “housing”. Add in: ‘Where there existing industrial and commercial developments adjacent to villages and settlements that are excluded from table 1, i.e. for which there are to be no BUABs, then these developments should have designated employment area boundaries which will control current and future development’. An example of this is the industrial sites at Greendale and Hill Barton adjacent to the villages of Woodbury Salterton and Farringdon.	This comment relates to the commentary on the proposed criteria which states ‘It is important that the Villages Plan is prepared in accordance with the strategy set out in the new local plan, which does not make provision for increased levels of development in rural settlements (rather it provides for infill development within the boundary and potential for affordable housing at the edges justified as an exception)’. No change to the proposed criteria is required and the policy statements on Greendale and Hill Barton Business Parks be considered through the development of the Villages Plan.
7284, 7285	A1	Expansion is required to allow boundaries to be redrawn to reflect clearly defined physical features.	The criteria strike the right balance between following physical features where it is sensible to do so.
7284	A1	Consider special designations, such as woodland, to protect character of settlement rather than blanket exclusion from settlement boundaries.	It is recognised that there are some ‘green’ or ‘open’ spaces within the core built form of a settlement that are important to its character and may be highly valued by local people. Paragraph 76 of the NPPF suggests that it may be appropriate to designate such spaces ‘Local Green Space’, subject to criteria set out in paragraph 77. Further advice is given in planning Practice Guidance Local Green Space designation Planning Practice Guidance . This issue can be considered through the development of the Villages Plan and through neighbourhood planning.
7285	A1	Criterion A1 needs to be revised to allow for some carefully considered expansion to Built-Up Area Boundaries where this is necessary to enable sustainable growth of the main villages and meet other general criteria, such as those set out under section A2.	This issue has been resolved through the adoption of the local plan.

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Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 1 about criteria for defining BUABs	Officer Response
7284	A2	Criterion A2 is correct that practical boundaries should follow clearly defined physical features. However, not all boundaries as currently drawn do and it is crucial that this issue is addressed. Looking at West Hill for example, the boundary is illogical, does not follow easily recognisable features and excludes areas that are close, and very well related to, the village core.	BUAB's will be considered afresh using agreed criteria as part of the Village Plan process.
7294	A2	It is not always necessary for BUAB's to follow physically defined features. Not all SHLAA sites have physical boundaries and should not be discounted on this basis.	The inclusion of 'where practical' at the start of the criteria allows sufficient flexibility.
7297	A2	A logical approach that allows flexibility.	No response necessary.
261, 6243	B1	Criteria B1 is hard to interpret.	Criteria B1 states that 'Built and extant planning permissions for residential and employment uses which are both physically and functionally related to the settlement' should be included. The discretionary areas here relate to whether a site is physically and functionally related to the settlement. Whilst it would be possible to add objective tests, it is not felt that these would help significantly with interpretation.
7297	B1 & B2	Support inclusion of sites built/with planning permission in principle, but need to take account of relationship with settlement.	Agreed. To be included within the BUAB sites with planning permissions will need to meet the other criteria listed.
6966	B2	Where community facilities are currently outside BUAB, extending to include them could result in an unnecessary extension of the BUAB, creating infill sites.	Criteria B2 currently includes 'Built and extant planning permissions for community facilities, such as religious buildings, schools and community halls which are considered to be functionally related to the settlement'. The word physical was omitted from the draft criteria in error (it appears in the exception criteria) and is now proposed to be included.
3215	B3	All Built up areas should be included. The description at the moment does not include commercial or industrial premises.	Criteria B3 includes 'Site allocations identified in the development plan for residential, community or employment uses which are physically and functionally related to the settlement'. Commercial and industrial premises are included in the term employment.

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Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 1 about criteria for defining BUABs	Officer Response
729	B3	Concerns that may be overly restrictive and hinder flexibility to meet future housing needs.	This issue has been resolved through the adoption of the local plan.
261, 6243	C1	Does C1 allow for windfall housing in private gardens?	Criterion C, areas to be excluded, includes 'the curtilage of any property with the capacity to extend the built form of the settlement, including large residential gardens'. Gardens within the defined BUAB will have the potential for windfall housing, but criteria C1 seeks to exclude gardens on the edge of settlements with the potential to extend the build form of the development (most likely to be on settlement edges).
388	C1	Development that results in loss of gardens and off road parking is not supported. The building line should reflect modern-day living.	C1 is specifically targeted towards any curtilage that has the potential to extend the urban form. These comments appear to relate to the principles of a BUAB approach, but this is committed to through the adopted Local Plan.
3215	C1	Where parts of a curtilage are to be excluded this should be on a site specific basis with justifiable reasons including; sustainability, highway safety, landscape or environmental impact.	Any partial exclusion of a curtilage will be assessed on a site specific basis.
3215	C1	Conflicts with NPPF unless there are other overriding reasons why development should not be permitted.	This issue has been resolved through the adoption of the local plan.
6299	C2	Recreational amenity space at the edge of the settlement is excluded by implication. Such space within settlements or largely surrounded by built form should therefore be included.	There is no need to add additional criteria to specifically include recreation areas – no other existing uses are specifically included in this way.

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Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 1 about criteria for defining BUABs	Officer Response
7284	C1 to C4	<p>It is correct to include the areas set out in Criteria B1 and B2, however further thought needs to be given to the areas to be excluded set out in Criteria C1 – C4. For example, the curtilage of any property with the capacity to extend the built form of the settlement, including large residential gardens, should not be automatically excluded where such curtilages are well related to the core of the village and its development boundary. Exceptions given for C1 too rigid. Areas without important landscape or environmental designations should be included if well related to built form, evidence of former buildings and a ‘practical’ boundary regardless of whether they are surrounded on more than two sides by buildings and the alignment of the boundaries should reflect this...certain areas could be subject to designations, such as woodland areas, rather than simply being excluded from the boundaries.</p>	<p>These criteria are considered to be consistent with the principle of not increasing levels of development in the rural settlements as a result of defining BUAB's through the Villages Plan.</p>
3215, 6299	C4	<p>Existing plan includes settlements with geographically distinct areas included in separate BUAB's and this approach should be continued. Alternatively such areas could be connected with one BUAB line and areas within that should not be developed identified and justified.</p>	<p>Criterion C4 excludes ‘Parts of settlements that might comprise groups of houses or buildings but which are separated by fields or open space from the main core of the village. The only settlements with ‘split’ BUABs in the adopted plan to retain their BUAB in the emerging plan are Feniton and Sidbury. These villages will need to be considered closely to see whether this approach is still justified in the context of Criterion C4 and the exception listed, which states ‘The only exception would apply where an outlying area also contains a range of services and facilities which might form a core service area in its own right’.</p>

Question 2: Are any additional criteria required to help define BUAB's?

Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 2 about additional criteria for defining BUABs	Response
8, 1545	New	Additional criteria on sustainability needed.	It is now proposed to consider the 'reasonable alternative' of including criteria to take account of walking distances to core facilities when defining BUAB's.
16	B1	Sites with planning permission granted on appeal that are immediately adjacent to the BUAB should be included.	This issue is covered in criteria A1
135	New	The 200 ft contour should be followed on the Burnards Field side of Colyton.	Such a criterion may be relevant to Colyton, but could not be used elsewhere. Contours are marked in 5 metre intervals, the nearest to 200ft being 60 metres. This would include some steeply sloping land towards the picnic area and towards the Four Cross Elms part of the town. Whilst contours can be very useful in considering the impacts of individual planning applications it would be too broad a criterion to be used to help define BUAB's.
178	New	Previously assessed sites adjoining the current BUAB should be included within the new BUAB.	Response is made in relation to a site in Broadclyst that was proposed for a housing allocation in the draft Villages Plan. The strategic context for the plan has altered from 2012 when the draft Villages Plan was prepared and it is important that work on the Villages Plan is in line with the adopted Local Plan.
761	New	AONB	It would not be appropriate to adopt a blanket approach for AONB's.
761	New	SAC/SPA sensitivity zones	This is an issue that should be considered on a case by case basis at planning application stage.
6271, 7224, 7236, 7283	New	No residential garden should be 'split' by a BUAB	Whilst practical features should be followed in the majority of cases, there will be exceptions where this will not be appropriate as set out in the commentary for Criteria A2.
6989, 6996	New	Extensions to BUAB's should favour brownfield over Greenfield.	The criteria as proposed allow for this in general terms.

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Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 2 about additional criteria for defining BUABs	Response
6989	New	No boundary changes should be permitted while consultation for a Neighbourhood Plan is being undertaken and when such a Plan has been approved, it should not be altered without the approval of the Parish Council.	The timing of the Villages Plan with the various Neighbourhood Plans is difficult to co-ordinate given the number of Neighbourhood Plans under preparation and the uncertainties inherent to timetabling the production of local and neighbourhood plans. The definition of Built-up Area Boundaries is fundamental to the development management process and it is important that a review is undertaken on a consistent basis as quickly as possible. It is hoped that work being undertaken on neighbourhood planning can be taken fully into account when boundaries are drawn.
6989	New	No changes to Built-up Boundaries should ever take place without the express approval of the relevant Parish Council, even if no Neighbourhood Plan has been approved.	Through the Villages Plan relevant parish councils will have the opportunity to engage with the definition of BUAB's and it is hoped that agreement will be possible.
6996	New	The most important requirement for changing built up boundaries is the consent of the relevant District Councillors, Parish Council and the people living in the area.	All these parties will have a say on the definition of BUAB's and it is hoped that a consensus will be reached, although it is by no means certain that all the people living in the area, District Councillors and Parish Councillors will be in full agreement. In these circumstances it will be up to the District Council to put forward the proposed BUAB that it considers to be 'sound'. This will be considered by an Independent Inspector, who will also hear and consider alternative points of view.
7071	New	I believe consideration should be given to the increased demand on local services, utilities and traffic to establish sustainability.	The proposed criteria seek to reflect existing built-up areas that may facilitate 'infill' development rather than promote significant extensions to settlements.

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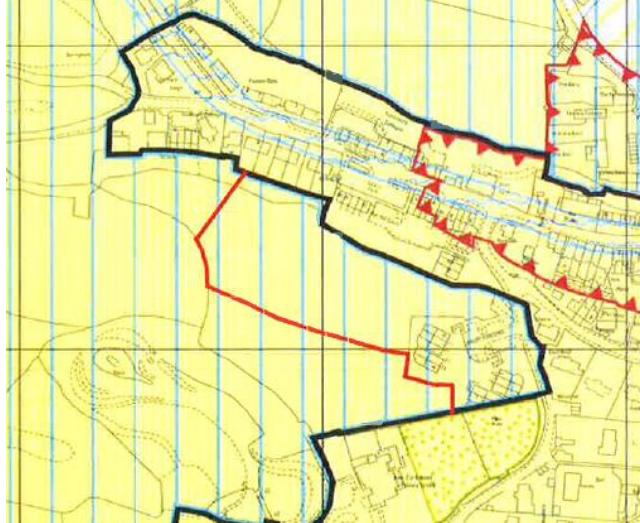
Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 2 about additional criteria for defining BUABs	Response
7158	New	<p>The principle of drawing a BUAB around each settlement in the development plan is partly to promote and partly to contain new development within that limit and <u>so maintain the clear distinction between countryside and built up area.</u> Where green spaces are situated on the edge of built-up areas they may be of importance as significant links and buffers between the built-up boundary and the open countryside. Special regard should be given to the relationship of sites to the open countryside; the need to protect green links between villages and country; and the need to retain existing, and to create new, buffer areas to soften the impact of development. Only those developments necessary for maintaining and enhancing the landscape character, biodiversity, community, social and economic needs of rural villages should be considered <u>with exclusion from the built-up area of predominantly open land uses on the edge of settlements such as playing fields.</u></p>	The proposed criteria reflect the issues raised.
7158	New	<p>Development boundaries should exclude those areas deemed to relate physically to the countryside and those areas of green field land which would unnecessarily increase land-take, increase urban sprawl or ribbon development. A settlement's identity can be as much as a result of its setting, within the surrounding countryside, as with the quality of its buildings and <u>landscapes around village settlements have a special role to play by preventing coalescence between adjacent built-up areas and in providing a rural setting to the built-up area.</u></p>	The proposed criteria deal with these issues.
7158	New	Built development in the countryside in the immediate vicinity of any defined settlement limit or on a site which clearly mars the distinction between the open countryside and the built-up edge of the settlement should be excluded.	The proposed criteria seek to exclude areas of countryside.
7158	New	Open space and undeveloped land that is detached or peripheral to the village should be excluded.	Proposed criteria C2, C3 and C4 deal with this issue effectively.

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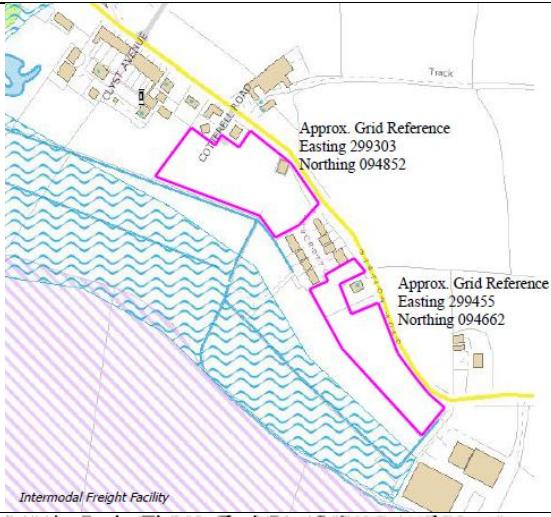
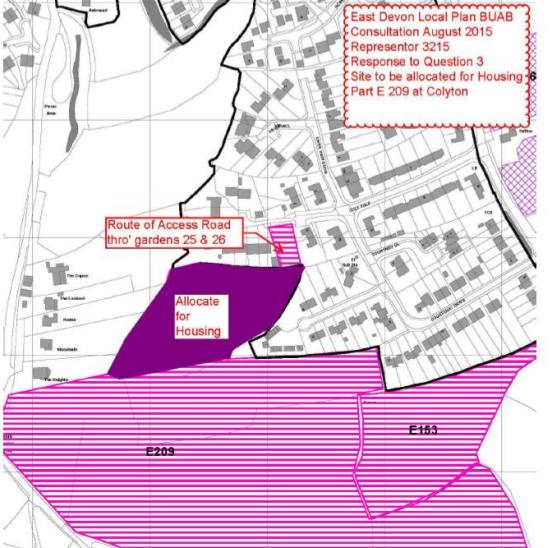
Rep. no.	Criteria Ref.	Summary of Points Raised in response to Question 2 about additional criteria for defining BUABs	Response
7158	New	Areas of land that protect key vistas (especially those enhancing historic buildings) and large gardens which are visually open and relate to the open countryside whose development would harm the form and character of villages should be excluded.	Proposed criteria C1 seeks to exclude large gardens with the capacity to extend the built form of the settlement. The setting of heritage assets needs to be assessed in any development proposal in accordance with Policy E8 of the new East Devon Local Plan.
7171, 7286, 7289, 7290	New	Sustainability so that land is included in the BUAB if it is suitable and capable of accommodating development to meet objectively assessed needs.	The new local plan sets out how the Districts objectively assessed needs will be met and does not require additional development in the 'Strategy 27' settlements.
7226	New	Green spaces in AONB's should only be developed in exceptional circumstances.	Development within the AONB is covered by Strategy 46 of the new local plan.
7283, 7224, 7231, 7236, 7283		Hill Barton and Greendale Business Parks should either be designated as 'Industrial Business Parks' or given the 'further protection' of a BUAB.	This issue will be addressed through the development of the Villages Plan and does not require changes to the BUAB criteria. A BUAB designation would not 'protect' these areas from further development, but would make it difficult to resist applications for residential development in principle.

Question 3. Are there any additional areas of land that should be considered for inclusion in the Built-up Area Boundaries for the settlements shown in Table 1? If so please explain either how the site meets with the proposed criteria for inclusion or why and how the criteria should be amended to facilitate the site's inclusion within the Built-up Area Boundary.

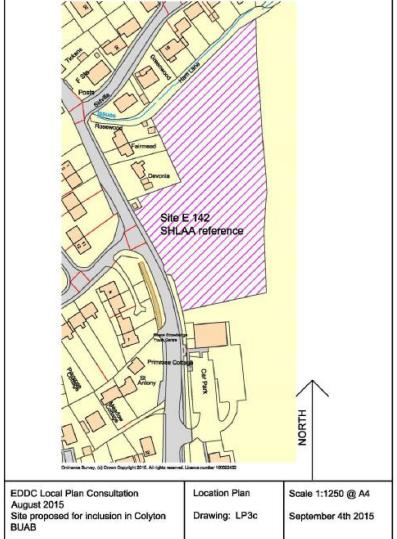
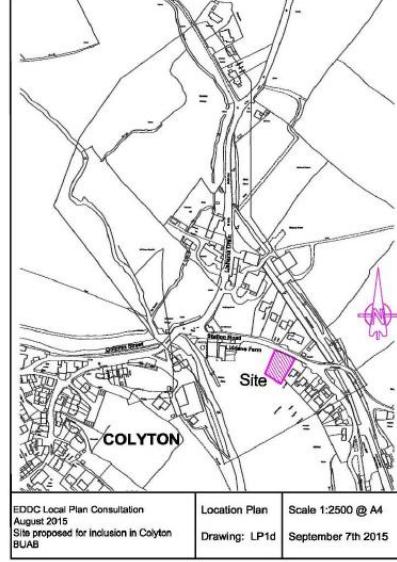
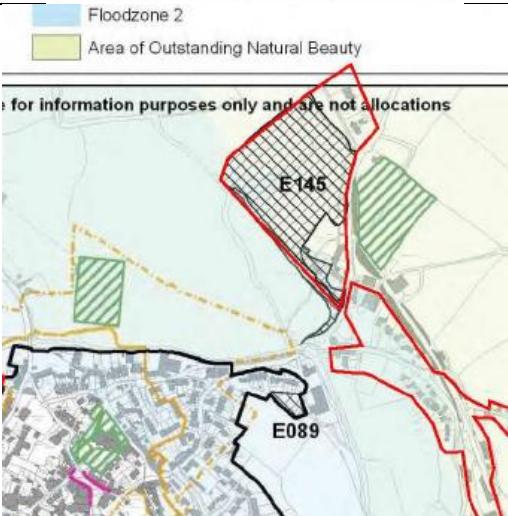
Table of Additional Land put forward by settlement – Included for information purposes only
- these sites will be considered as part of the detailed work to be undertaken on defining Built-up Area Boundaries.

Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
77	Beer	Short Furlong		Housing already there
77	Beer	Little Hemphay		Housing already there
7285	Beer	Land at and West of Short Furlong		Site abuts BUAB on two sides and is well related to village centre. No other sites available within the BUAB for this level of development.
178	Broadclyst	Heathfield site, Dog Village	None submitted	No suitable sites for development within existing BUAB.

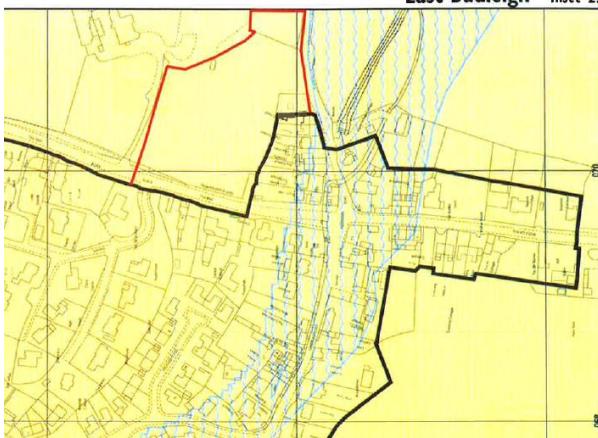
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
421	Broadclyst	Broadclyst Station	None submitted	Broadclyst station could have a BUAB as a satellite to Broadclyst which would create infill opportunities and give the area its own identity rather than merging with Cranbrook.
7295	Broadclyst	Land adjoining Station Road, Shercroft Close and Cotteral Road, Broadclyst		Land sandwiched between Cranbrook and the Intermodal Interchange. Short distance from local facilities and transport links. Unconstrained.
3215	Colyton	Land to South of Coly Vale		Planning permission for residential development in the rear gardens of 25 and 26 Coly Vale was granted around 20 years ago but has since lapsed. The owners have indicated that they would be willing to sell land to provide a suitable access.

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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
3215	Colyton	Land adjoining Peace Memorial Playing Fields	 <p>EDDC Local Plan Consultation August 2015 Site proposed for inclusion in Colyton BUAB</p> <p>Location Plan Drawing: LP3c Scale 1:1250 @ A4 September 4th 2015</p>	Very sustainable location and accords with NPPF.
3215	Colyton	Land at Station Road, Colyton	 <p>EDDC Local Plan Consultation August 2015 Site proposed for inclusion in Colyton BUAB</p> <p>Location Plan Drawing: LP1d Scale 1:2500 @ A4 September 7th 2015</p>	Site is enclosed and adjacent to a built up area (although not within the present BUAB). Flooding maps are not accurate and site is in a sustainable location and would have no adverse environmental, landscape or visual impact.
3215	Colyton		 <p>Floodzone 2 Area of Outstanding Natural Beauty</p> <p>for information purposes only and are not allocations</p> <p>E145 E089</p>	To ensure a supply of residential development for the plan period and to help maintain the sustainability of Colyton while protecting its setting. Site should be identified as a 'reserve site' and BUAB amended to include it.

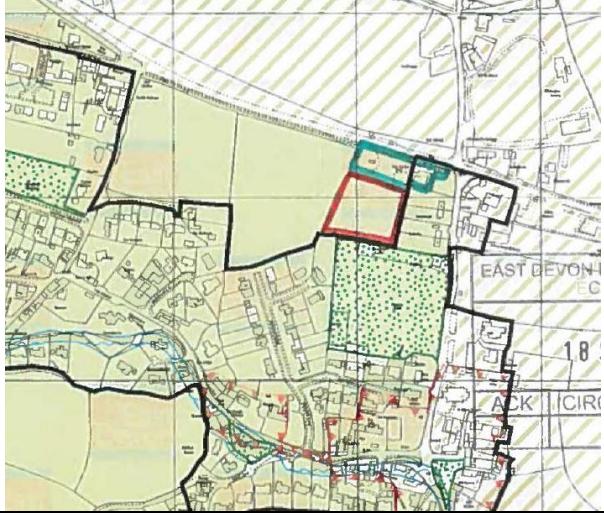
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7305	Colyton	Land to the South of Yaffles, Coly Road		Sustainable location closely related to existing urban form and contained by physical features. Different character to countryside beyond.
7303	Dunkeswe II	Land North of Percy Cross		Link between two communities, provision of affordable housing, land for school and financial contribution to improved transport links.
6989, 6996	East Budleigh	Carters Yard	None supplied	Brownfield site covered with unsightly, rusty industrial sheds.
7285	East Budleigh	Land East of Oak Hill		Well related to village centre and local services and adjoins existing BUAB.

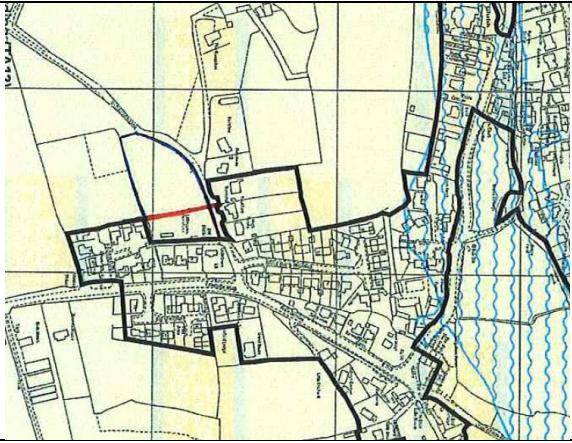
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
391	Feniton	Feniton Park site	None supplied	To take account of planning permission, but should be drawn tightly.
391, 3207	Feniton	Wain Home site		Development is under construction.
391	Feniton	Sunny Lea	None supplied	Planning permission granted
7290	Feniton	Land around Sherwood Cross		Site is well related to services and facilities.

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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7286	Kilmington	Land at Gapemouth Corner		Close to choice of transport options
7304	Kilmington	Land to the rear of the Old Inn		Site abuts BUAB on two sides. The other two sides are defined by physical features that have a degree of permanence. Visually more part of settlement than open pasture to the west.
447	Musbury	Baxters Farm	<p>None submitted, but letter says it is the site proposed for allocation in the Consultation Draft Villages Plan (2014)</p>	The site fits criteria B3 as it is physically and functionally related to the settlement and was the plot chosen by residents.
7294	Musbury	Land at Yonder Mount (E128)		Sustainable, physically and functionally well related to the village.

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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7294	Musbury	Land North of Allotments (E131)		
7298	Newton Poppleford	Land at Littledown Nurseries, Littledown Lane		Site meets proposed criteria C1 as it is a small area of land surrounded on more than two sides by development and would not extend the visual appearance of the settlement.
7300	Newton Poppleford	Land West of Venn Ottery Road		To deliver additional housing to Newton Poppleford.
7300	Newton Poppleford	Land South of Exeter Road and North of Littledown Lane		
7171	Sidbury	Furzehill Farm, Chapel Street		Close to choice of transport options and range of services in centre of village. Could be developed without adverse landscape impacts.

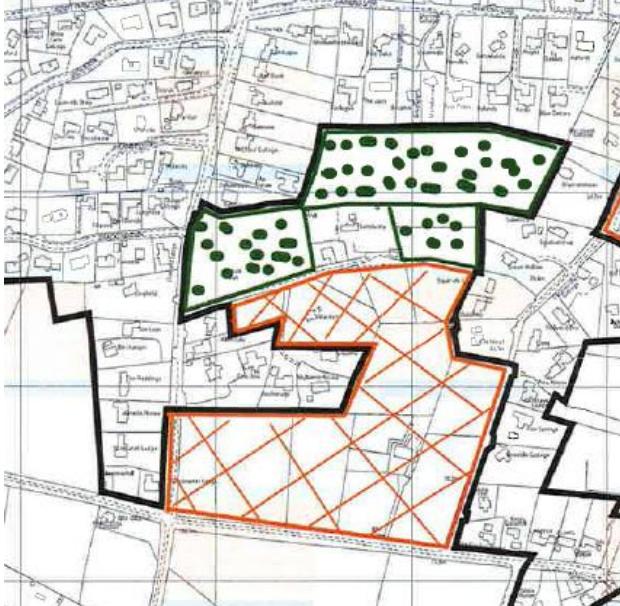
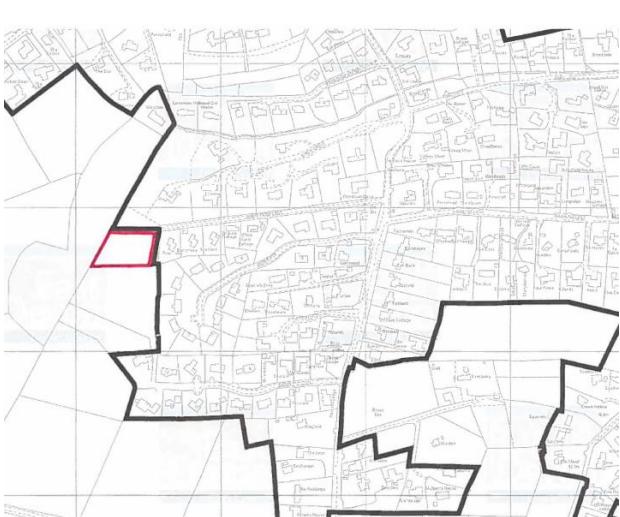
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
16	West Hill	Land East of Knapp Cottage		Site surrounded by hedges and has planning permission for one dwelling granted on appeal (14/2998/FUL).
7228	West Hill	Land between Higher Broad Oak Road and Lower Broad Oak Road		Present boundary follows very convoluted line.
7284	West Hill	Land North of Bendarroch Road		Would make more logical and sensible boundary

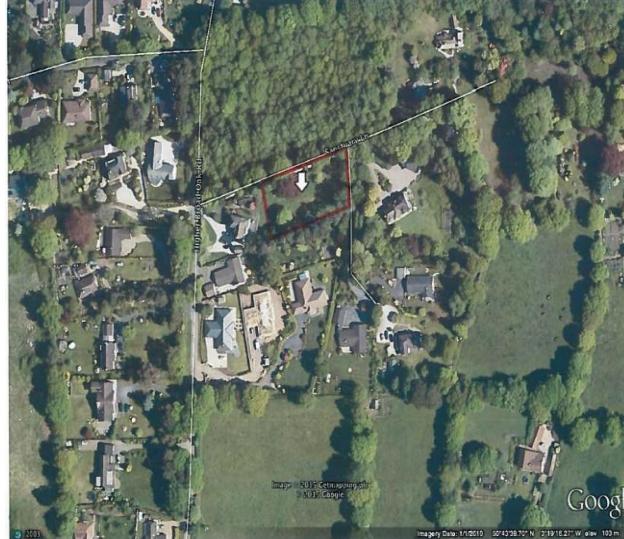
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7284	West Hill	Land South of Elsdon Lane		Would make more logical and sensible boundary
7284	West Hill	Land East of Ashley Brake		To take account of planning permission.
7284	West Hill	Land East of Broad Oak Road and West of Cuckoo Down Farm		Site abuts existing BUAB in part on two sides and is very well related to the village centre. Parts of the site are previously developed land and utilities are already in place. Low quality agricultural land.
7284	West Hill	Land East of Broad Oak Road and West of Stones House/ Knapp Cottage		Would make more logical and sensible boundary

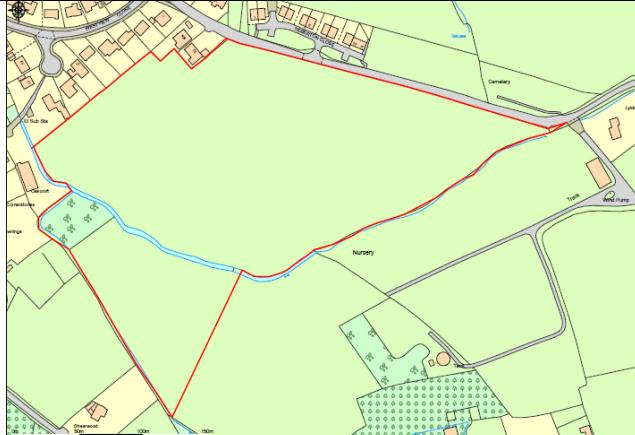
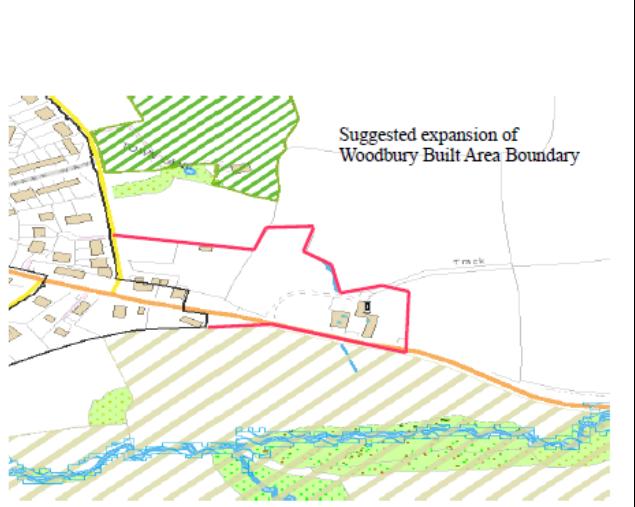
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7284	West Hill	Land between Higher Broad Oak Road and Lower Broad Oak Road		Would make a more logical and sensible boundary.
7284	West Hill	Land North of Eastfield		Would make a more logical and sensible boundary.
7306	West Hill	Land at White Farm Lane		The land is bordered on two sides by residential curtilages, with the other two boundaries being defined by physical features with a degree of permanence. Extension of the BUAB to include the land would not visually extend the appearance of the settlement.

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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7307	West Hill	Land to the rear of Harley Thorne, Higher Broad Oak Road		<p>The site is bordered on three sides by residential curtilages and the other side is defined by a feature that has a degree of permanence. Extension of the BUAB to include the land would be logical and consistent with the criteria to be adopted. It would not prejudice landscape, amenity, or highway safety considerations and would not physically or visually extend the appearance of the settlement.</p>
388	Whimple		<p style="text-align: center;">None submitted</p>	<p>The Parish Council identified parcels of land to be included for future development in the SHLAA exercise in November 2012. We would like EDDC to agree with the PC in assessment of suitable land. In starting a neighbourhood plan the Parish Council will be identifying parcels of land for development to bring Whimple into the 21st century.</p>

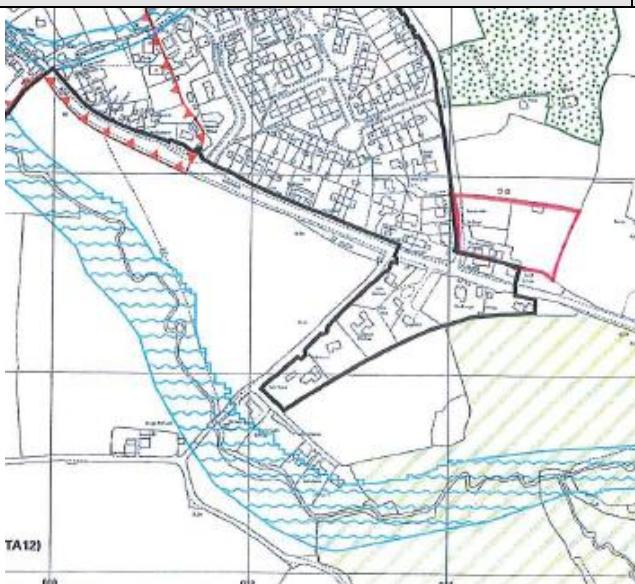
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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7289	Whimple	Land South of Grove Road		Site is sustainably located to take advantage of a choice of transport options and is suitable, available and achievable for development.
6315	Woodbury	Webbers Meadow, Castle Lane		Site has planning permission (12/2627/MFUL) and work has been completed. Meets proposed criteria B1.
7295	Woodbury	Ford Farm		Site abuts developed form, is between existing established development, is a reasonably short distance from the village centre with footpath connections nearby, no significant features will be lost and site is not subject to flooding and the site would mark a logical end to Woodbury's eastern development.

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Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7295	Woodbury	Land at Globe Hill	<p>Approx. Grid Reference Easting 300641 Northing 087259</p>	<p>Site abuts villages developed form, is less than 300 metres from centre with footpath connections, no significant features will be lost and site is not subject to flooding and would mark a logical end to northern development.</p>
7296	Woodbury	Land at Gillbrook		<p>Site accepted through SHLAA process (W165) and meets tests set out in paragraph 47 of the NPPF (that it is available, suitable and achievable). A site further to the south was also considered through the SHLAA (W100). Extending the boundary would conform with the NPPF and provide flexibility to meet ongoing local housing needs.</p>

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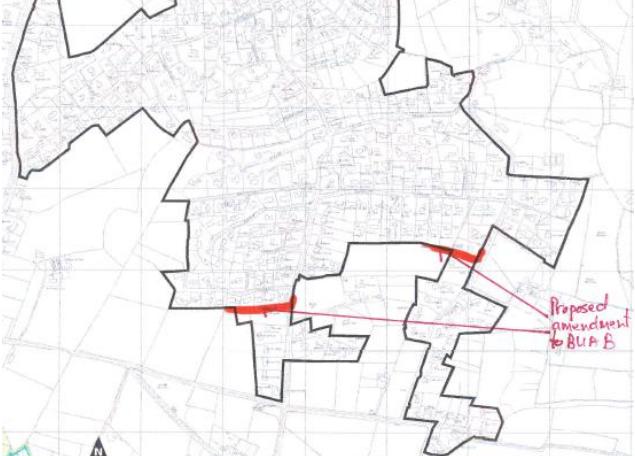
Rep No	Village / Location	Site Address	Map - put forward in reps on Question 3	Summary of justification
7297	Woodbury	Land Adjacent to Trederwen, Town Lane		Planning permission was originally granted as an 'exception', but the subsequent application was granted under 'emerging planning policies' (planning application 14/1380/MOUT).

Question 4. Are there any additional areas of land that should be excluded from the Built-up Area Boundaries for the settlements shown in Table 1? If so please explain either how the site meets the proposed criteria for exclusion or why and how the criteria should be amended to justify exclusion of the site from the Built-up Area Boundary.

For information purposes - where specific sites have been put forward, they will be considered as part of the detailed work to be undertaken on defining Built-up Area Boundaries. Officer comments are given only where relevant.

Rep No.	Settlement	Site Address	Map	Summary of justification put forward in rep.	Officer Comments
6966	Chardstock	Whole of settlement	N/A	Sustainability criteria	Chardstock is no longer included as 'Strategy 27' settlement.
7158	Clyst St. Mary	Plymouth Brethren	None submitted	Unsustainable development site that was specifically excluded from the Local Plan. Would be contrary to proposed criteria A1.	
7158	Clyst St. Mary	Friends Provident site	None submitted	Greenfield part of application site 14/2637/OUT (excluded from Local Plan allocation).	
6989	East Budleigh	No Grade 1 agricultural land	N/A		The proposed criteria would not facilitate the incorporation of any agricultural land into BUAB's.
6989	East Budleigh	Agricultural land above Frogmore Road	None submitted	High profile situation in Otter Valley at the edge of the floodplain	The proposed criteria would not facilitate the incorporation of any agricultural land into BUAB's.
391	Feniton	Whole of playing fields including car park and club house down to Station Road	None submitted	Only large green space in village and car park and clubhouse are integral	
447	Musbury	Retain current BUAB which excludes area	None submitted	Character of conservation area, historical significance to	

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Rep No.	Settlement	Site Address	Map	Summary of justification put forward in rep.	Officer Comments
		around 'Mountfield'.		village and contributes to local visual amenity	
261 6243	Newton Poppleford	Small area in centre with history of flooding.	None submitted	Wants this to be considered through Neighbourhood Planning process	No action required through Villages Plan
6243	Newton Poppleford	Sites previously turned down at appeal.	None submitted	Planning Inspectors comments should be taken on board when making decisions on development in future.	The proposed criteria should deal with most of the issues, but where there is a recent planning appeal it will be useful to also consider the Inspectors comments.
8 1545	West Hill	Southern ends of Higher Broad Oak Road and Lower Broad Oak Road	See Map Below 	To reflect sustainability criteria	It is proposed that these areas will be looked at through further assessment work.
388	Whimple	Green Wedge	See Local Plan map	To maintain separation between Whimple and Cranbrook/Rockbeare	Green wedges are a strategic policy tool to help prevent coalescence of settlements (Strategy 8 of the local plan).
7224 7283	Woodbury Salterton	Any agricultural land in the vicinity of Woodbury Salterton	N/A	Representor seeks to protect land from industrial development and to designate agricultural land, woodland and 'landscaping' as 'Green	Green wedges are a strategic policy tool to help prevent coalescence of settlements (Strategy 8 of

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Rep No.	Settlement	Site Address	Map	Summary of justification put forward in rep.	Officer Comments
				Wedges'	the local plan).
7233	Woodbury Salterton	Agricultural land in and around Woodbury Salterton	N/A	Representor wishes agricultural land to be excluded from any further industrial development	The proposed criteria do not promote the expansion of settlements onto any agricultural land.
6989	Any	No Grade 1 agricultural land	N/A		The proposed criteria do not promote the expansion of settlements onto any agricultural land.
7071	Any	Not specific	N/A	Any site with limited access/visibility to existing road network	This is a detailed matter that would be considered as part of any planning application.
7227	Any	Green fields in AONB's	N/A	Respondent believes there should be no expansion onto green fields in AONB's	The proposed criteria do not promote the expansion of settlements onto green fields.
7231	Any	Surrounding farmland	N/A	Surrounding farmland should be excluded	In policy terms any land outside of a defined BUAB is protected by Strategy 7 of the new local plan.
7236	Any	Agricultural and rural land surrounding settlements without BUAB.	N/A	Representor wishes these areas to be protected from further development.	In policy terms any land outside of a defined BUAB is protected by Strategy 7 of the new local plan.

Question 5 : Do you have any other comments relevant to the Villages Plan?

Rep. No.	Summary Point Raised - in response to Question 5 additional comments	Officer Response
38	Settlement should have a Built-up Area Boundary to help facilitate affordable housing (Whitford).	This issue has been resolved through the adoption of the Local Plan.
54	Settlement should not have been included in Strategy 27 as did not meet criteria (Chardstock).	This issue has been resolved through the adoption of the Local Plan.
62	Parish Council support designation of a Built-up Area Boundary through neighbourhood planning (Stockland).	The submission of the Stockland Neighbourhood Plan is awaited, but this issue should not affect the Villages Plan which does not cover settlements not listed in Strategy 27 of the adopt plan.
135	Emerging neighbourhood plan likely to adopt same BUAB and supersede the Village Plan.	The development of the Villages Plan at the same time as the various neighbourhood plans will inevitably mean that there will be differences in timing between plan adoption/making.
178, 7287	Villages should be given flexibility to expand in the future to maintain healthy and prosperous village life.	The strategic policies of the adopted local plan allow an appropriate degree of flexibility.
261, 7287	Neighbourhood Planning should determine future development needs.	The strategic policies of the adopted local plan allow an appropriate degree of flexibility.
294, 7295	More rural housing allows rural communities to remain sustainable and an infusion of new homes is needed.	The strategic policies of the adopted local plan allow an appropriate degree of flexibility.
421	Agree with Inspectors concerns over Strategy 27 – important that villages should not grow disproportionately outgrowing their capacity and infrastructure and becoming unsustainable in terms of employment and transport.	These issues were dealt with through the local plan.
447	Recognise growth essential to ensure village survival, but hope any development will be proportionate and incremental.	The proposed BUAB criteria do not seek to increase levels of development in rural settlements.
977	Sites for exceptions housing should be related to settlements where sustainability and vibrancy is assessed on its merits rather than a 'tick list' as lead to the current situation.	These issues were dealt with through the local plan.
3165	Supports the inclusion of the 15 settlements that were included in Strategy 27 as a result of the robust approach of the officers, but not Dunkeswell and Chardstock.	These issues were dealt with through the local plan.
3296	List of Strategy 27 settlements should be extended to comply with NPPF.	These issues were dealt with through the local plan.

Rep. No.	Summary Point Raised - in response to Question 5 additional comments	Officer Response
3215, 3741, 6294, 6299, 7150, 7178, 7240, 7286, 7289, 7290, 7300	Consultation is premature in advance of the conclusion of the local plan process.	Work on the Villages Plan is recommencing now the Local Plan has been adopted.
6243	Neighbourhood plans should take precedence in determining planning applications.	Planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Both the adopted Local Plan and any made Neighbourhood Plan form part of the development plan. Where there is a difference between a neighbourhood plan and a local plan, whichever was the last to be made or adopted takes precedence.
6850	Better to allow incremental development that will aid the local economy rather than volume house builders.	The Villages Plan will not deal with large housing allocations.
6801	Agrees with removal of BUAB at Broadhembury.	Broadhembury is no longer listed in Strategy 27.
6920	Some residents (in Sidbury) support an enlargement to the BUAB for a small number of homes for local people.	This is an issue that can be considered through the Sidmouth Neighbourhood Plan.
6945	Areas that affect woodland and therefore wildlife must be protected at all costs.	This is an issue that will be considered through the development management process rather than the Villages Plan.
6945	Affordable housing should not be built near listed buildings as it would detract from the attractiveness and value of the listed building.	This is an issue that will be considered through the development management process rather than the Villages Plan.
6957	BUAB for Broadhembury should be retained to enable provision of housing to meet local needs and support local services.	These issues were dealt with through the local plan and will also be considered through neighbourhood planning.
6971	Protecting natural beauty of AONB of prime importance.	Conserving the AONB's is a key consideration in planning decisions, but one that must be weighed in the 'planning balance'.
6971	Development in rural areas should be strictly controlled and virtually all new homes should be in towns and 'Strategy 27' settlements.	This issue was considered through the local plan process and will also be an issue in neighbourhood planning.
6971	When defining BUAB, green spaces that separate different parts of a settlement should be protected.	This is taken into account in the proposed criteria and consideration can also be given to the designation of 'local green space' through both the Villages Plan and neighbourhood planning.

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Rep. No.	Summary Point Raised - in response to Question 5 additional comments	Officer Response
6980	Little demand for affordable housing in Offwell and lack of services and facilities would make further housing unsustainable.	Offwell is not included in the list of 'Strategy 27' settlements so does not fall to be considered through the Villages Plan.
6996, 7226	Changes to BUAB's should be determined through neighbourhood planning.	It is possible to consider BUAB's through neighbourhood planning, but not all settlements wish to undertake neighbourhood planning and it is important to progress the Villages Plan to provide more certainty for the development management process in the settlements concerned.
7149, 7224, 7233, 7282, 7283, 7288	Business parks should have their own BUAB's.	Consideration will be given to specific policies for business parks, but they are not appropriate for BUAB's because this may promote residential development.
7150	Boundaries should be considered through the local plan process and include suitable development areas around settlements to allow for future growth.	This issue was dealt with through the Local Plan.
7178, 7243, 7304, 7305, 7306, 7307	Restrictive function of BUAB's should be reconsidered in light of NPPF and a criteria based approach adopted instead.	This issue was dealt with through the Local Plan.
7206	Residents of rural areas do not necessarily want to move to coastal towns, Cranbrook or Exeter to get a new house and a more flexible approach should be taken to make it easier to develop housing outside of the 'Strategy 27' settlements.	This issue was dealt with through the Local Plan.
7208	Services and facilities (in Broadhembury) need an increase in population to sustain them.	This issue was considered through the Local Plan and can be dealt with through neighbourhood planning.
7227, 7299	No need to expand BUAB (for East Budleigh and Clyst St Mary)	This issue was dealt with through the Local Plan.
7236	No development should be permitted outside BUAB's; there should be no exceptions.	Planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The adopted Local Plan does allow for exceptions.
7243	Distribution of growth between rural settlements is a strategic matter for the LPA to assess and not for neighbourhood plans.	This issue was dealt with through the Local Plan.
7291	BUAB (for Broadclyst) should remain the same as there is potential to build within it and new houses are already putting a strain on local facilities.	It is not proposed to increase the levels of development in rural settlements.

**LIST OF REPRESENTOR NUMBERS AND NAMES
CONSULTATION ON PROPOSED CRITERIA FOR DEFINING BUILT-UP AREA
BOUNDARIES FOR VILLAGES AND SMALL TOWNS**

Date of Consultation: Friday 7 August - Monday 21 September 2015

Representor No.	Representor Name	Organisation	Agent (if any)
8		Ottery St Mary Town Council	
16	Mr N Gaywood		
39		Shute Parish Council	
54		Dunkeswell Parish Council	
62		Stockland Parish Council	
67		Sidmouth Town Council	
77		Beer Parish Council	
82		Branscombe Parish Council	
124		South West Water	
135		Colyton Parish Council	
164		Sport England	
178	Mr E Lewis		
261		Newton Poppleford and Harpford Parish Council	
294	Mr R Persey		
388		Whimple Parish Council	
391		Feniton Parish Council	
421	Stephen Pugh	Lateral Design Projects Ltd	
447		Musbury Parish Council	
761	Dr N Daniel	Otter Vale Association	
977	S Southwell	Devon Communities Together	
1083	Mr K Williams		
1271	Mr Eric Flowers		
1294	Mr Roger Hutton		
1545		West Hill Residents' Association	
1732	S E D Fortescue		
3165	Councillor B Ingham		
3207		Wainhomes	Emery Planning
3215	Mr A J Carthy		
3296		Heritage Developments (SW) Ltd	J Terry, Vail Williams
3741	Mr D Seaton	PCL Planning	
5032	Mr Julian Hunt		
6243	Councillor V Ranger		
6271		Woodbury Parish Council	
6294		South West HARP Planning Consortium	Tetlow King Planning
6299		Strategic Land Partnerships	
6315		DCH Group	WYG Planning

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Representor No.	Representor Name	Organisation	Agent (if any)
6741		Honiton Town Council	
6801	Mr M Drewe		
6850	Mr R C Jones		
6920	Mr D Addis, Town Councillor	Sidbury Ward	
6945	Lord Adam B Giles-Wilson		
6949	Mr T Mount		
6957		Broadhembury Parish Council	
6966		Chardstock Parish Council	
6971	J B Morris		
6980	D and R Hirons		
6989	P F Bowler		
6996	Marion Bowler		
7071	M F Mulrain and D C Jarvis		
7149	Janice Owen		
7150		Persimmon Homes South West and Charles Church South West	Mr A Anderson, Persimmon Homes South West
7158	Mr M and Mrs L Trim		
7171		LVA	Savills (UK) Ltd
7178	Mr and Mrs Cann		Mr E Heynes, Jillings Heynes Planning Ltd
7203	Mr E Slattery		
7206	Councillor S Grundy		
7208	Hembury Court		
7209	G Kayley		
7210	Mr Stephen Green		
7211	Mr Ben Green		
7212	Rachel Green		
7213	Miss Ingrid Quick		
7214	Mr John Smith		
7215	Irene Smith		
7216	Mr R Steer-Kemp		
7217	Lynne Armstrong		
7218	Mr G V Russ		
7219	13 residents Down Close, Newton Poppleford		
7220	Mr W Tuvey		
7221	Sam Tuvey		
7222	Mr Keith Tuvey		
7223	Penny Tuvey		

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Representor No.	Representor Name	Organisation	Agent (if any)
7224	Mr B Peaker		
7225	Denise Hutchinson		
7226	Dr Roberts (Chair)	East Budleigh with Bicton Parish Council Neighbourhood Plan Working Party	
7227	Dr S M Roberts		
7228		The Chancery Lane Company (1935) Ltd	
7229	Clare Werry		
7230	Chris Sloan		
7231	Mr Andrew Scott		
7232	R and M Hicks		
7233	K T Phillips		
7235	Mrs B M J Pratt		
7236	Aran Brown		
7237	A W Arnold		
7239	Mr D Buss (Chair)	East Budleigh with Bicton Parish Council	
7240		Mr A Arkwright	Alan Breckon
7241	Mr Barry Easter		
7243	Mr R House	Gladman Developments Ltd	
7244	Sally Selby		
7245	Mr John Selby		
7246	T A Hanson		
7247	Mr G W D Hole		
7248	Mrs C Hole		
7249	R H Humphrey		
7250	Mrs M A Humphrey		
7251	Mrs M M Rowe		
7252	J Reynolds		
7253	Mr M A Pattison		
7254	Mr T M Pattison		
7255	Mrs H J Hutton		
7256	Major K A F Edgecombe		
7257	Mrs S M J Edgecombe		
7258	L G Skilling		
7259	E A Perry		
7260	S K Penwright		
7261	B D Penwright		
7262	J Macaulay		
7263	N S Barnes		
7264	N S Macaulay		
7265	K Simmonds		

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Representor No.	Representor Name	Organisation	Agent (if any)
7266	B Simmonds		
7267	J Vince		
7268	R Vince		
7269	Dr G A Walters		
7270	S Walters		
7271	D Walters		
7272	R Walters		
7273	I C B Spriggs		
7274	Mrs R Spriggs		
7275	J L Bushel		
7276	M J Cotterill		
7277	Mr T Kempton		
7278	Mrs A Scott		
7279	R Scott		
7280	R T Taylor		
7281	G Taylor		
7282	Mr D Cowler		
7283		Woodbury Salterton Residents Association	
7284		Stuart Partners Ltd	Bell Cornwell LLP
7285		Clinton Devon Estates (Land at Beer)	Bell Cornwell LLP
7285		Clinton Devon Estates (Land at East Budleigh)	Bell Cornwell LLP
7286	Mr Hutchings		Savills (UK) Ltd
7287		Membury Parish Council	
7288	Dawn Skinner		
7289		Landowner of land south of Grove Road, Whimple	Savills (UK) Ltd
7290		Taylor Wimpey	Savills (UK) Ltd
7291	Peter and Anna Jeffery		
7292	Mary Holt		
7294	The Johnson Family		
7295		WWD Ltd (Land at Broadclyst)	Bryan Turner
7295		WWD Ltd (Land at Ford Farm, Woodbury)	Bryan Turner
7295		WWD Ltd (Land at Globe Hill, Woodbury)	Bryan Turner
7296		Redrow Homes	Stride Treglown Ltd
7297		Badger Homes Ltd	JLL
7298		Mr Mark Turner	JLL
7299	Mr and Mrs Spearman		Carole Trim Architect
7300	Nick Moorhouse		

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Representor No.	Representor Name	Organisation	Agent (if any)
	Architect		
7301	Graham Wood		
7302	Mrs S Wood		
7303		Feniton Park Limited	Paul Willis
7304	Mrs J While		Taylor – Wilkinson
7305	Mrs A Gould		Taylor – Wilkinson
7306	Mr A Lightfoot		Taylor – Wilkinson
7307	Mr and Mrs M Mattocks		Taylor – Wilkinson
7308	The Occupier 1		
7309	The Occupier 2		
7310	Hannah Parry		
7311	Andrea Parry		
7312	Huw Parry		
7313	A J Lovegrove		
7314	Valerie A Wright		
7315	Gary A Wright		