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Response to the submission of the Bishops Clyst Neighbourhood Plan

Having considered the plan in detail, please find herewith East Devon District Council's response to the submission consultation of the Bishops Clyst Neighbourhood Plan. We wish also to congratulate and commend the hard work and dedication of the plan producers on reaching this stage of the process.

EDDC Cmnt No	Issue / Policy In Plan	Comment
1.	Para 1.11	The new Built up area boundary will be proposed in the Villages Development Plan Document, not the Local Plan. This should be amended.
2.	Para 1.13	In the third sentence the word 'good' should be removed.
3.	Policy BiC02	The policy refers to a method statement, it would be useful for a description of this to be provided in the glossary of terms at the end of the document.
4.	Policy BiC04	This policy seeks to ensure the use of sustainable drainage systems. As it may not always be reasonable or appropriate to use SuDS for all development proposals we would recommend the addition of words in the policy to read ' <i>...minimise flood risk where practical and appropriate and, in particular...</i> '
5.	Policy BiC08	This policy states that development outside the BUAB will only be supported if they comply with the policies in the Neighbourhood Plan or strategic policies in the Local Plan. This is not strictly the case as applicants will also have to comply with our non-strategic Local Plan policies. Regardless, it goes without saying that this will be the case and so we would advise the removal of this statement.
6.	Policy BiC10	We would recommend the inclusion of the following words to the policy ' <i>Proposed developments of four or more dwellings should contain a mix...</i> ' to allow for single development proposals to come forward with more than 2 bedrooms where required.
7.	Policy BiC11	This policy seeks to set parking standards for new development to accommodate a sufficient number of cars for occupiers. In the justification,

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Chief Executive: Mark R Williams Deputy Chief Executive: Richard Cohen



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		<p>the plan argues that 'The Parish Council wants to ensure that housing development accommodates a high level of car ownership and does not lead to local roads becoming any more congested or obstructed by parked cars'. Little supporting evidence has been presented in the Plan to indicate that the parish or village suffers with congestion issues, although we are aware that this is one of the reasons that the Neighbourhood Plan group has brought the policy forward.</p> <p>The standards themselves are considerably higher than those set out in the Local Plan. It sets a minimum of 2 off-road spaces for each one and two bed house, and a minimum of 3 off-road spaces for units with three or more bedroom, whereas the Local Plan includes provision for at least 1 car parking space for one bedroom homes and 2 spaces per home with two or more bedrooms.</p> <p>The NPPF states that 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel... If setting local parking standards for residential and non-residential development, local planning authorities should take into account:</p> <ul style="list-style-type: none"> • the accessibility of the development; • the type, mix and use of development; • the availability of and opportunities for public transport; • local car ownership levels; and • an overall need to reduce the use of high-emission vehicles.' <p>Clyst St Mary has a regular bus service with approximately hourly or greater frequency, a good variety of local services and facilities as well as being in close proximity to Exeter and a number of employment sites- all should be contributory factors in reducing the need to travel by car.</p> <p>The increased standards are also not restricted to any particular affected area, a development in Sowton would still have to provide the prescribed number of spaces regardless of whether there was an issue with on-street parking or not.</p> <p>Increased standards could also lead to the knock-on impacts by increasing the size of plots, leading to lower densities and an increase in the cost of housing, impacting on the viability of future housing schemes.</p> <p>As it stands, we feel that this part of the policy does not have regard to the NPPF and is in conflict with Strategy 5B of the Local Plan, which seeks to promote sustainable modes of travel and transport. It also does not promote the objectives of sustainable development, as required by the basic conditions.</p>
8.	Policy BiC18	In order to encourage sustainable development we would like the following statement added to criteria point b "...unacceptable impacts on the local road network or encourage increased use of private motor vehicles.'
9.	Policy BiC20	The first letter of the word 'the' at the start of Criteria point b uses an odd symbol. This should be amended.
10.	Policy BiC26	This policy seeks contributions from developers towards a specific important cycle route. It is unclear on how the Neighbourhood Plan group intend on securing contributions, and whether this will be coming out of the 25% of CIL from new development that the parish council will receive once the plan is adopted. We would advise the group to clarify this either in the policy or supporting text.
11.	Footnot e 13,	Footnote refers to the 'Pebbled' heaths rather than 'Pebblebed' which is their correct name.

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	page 18.	
12.	Para 10.5	This must be 'more than 5' rather than '5 or more' to accord with government legislation

Yours sincerely,

Tim Spurway
Neighbourhood Planning Officer