

# Stockland Neighbourhood Plan

2014-2031

## Consultation Statement

### Part 2 - Statutory and Strategic Consultees



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# Stockland Neighbourhood Plan

## Part 2: Consultation Statement – Statutory and Strategic Consultees

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## 1. Introduction

This Consultation Statement has been prepared by the Stockland Neighbourhood Plan Steering Group to conform to the legal obligations of the Neighbourhood Planning Regulations 2012.

Section 15(2) of Part 5 of the Regulations sets out what a Consultation Statement should:

- a) Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan
- b) Explain how they were consulted
- c) Summarise the main issues and concerns raised by the persons consulted
- d) Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan

This Consultation Statement provides an overview of each of the above stages of consultation in accordance with Section 15(2) of Part 5 of the Regulations.

Part 2 of this Consultation Statement summarises the statutory and non-statutory consultation undertaken with relevant statutory bodies and stakeholders, other than those that could be described as being a part of our community, in developing the Stockland Neighbourhood Development Plan.

## 2. Summary of Consultation Approach to Statutory Consultees

It was decided to identify and make the earliest contact with those bodies and organisations that may be included within the categories designated as statutory consultation bodies under the terms of schedule 1 of the Neighbourhood Plan Regulations 2012. With the help of our consultants, East Devon District Council and Blackdown Hills AONB we prepared a contact list of all bodies and organisations that serve or provide services to the Parish.

The aims of the Stockland Neighbourhood Plan consultation process were to:

- 'front-load' the consultation, so that the Plan could be informed by the views of those with an interest in the parish from the earliest stage
- to ensure the neighbourhood planning process was informed by the views and intentions of statutory bodies and stakeholders
- to take fully into account those views and intentions
- meet the requirements of Regulation 14

### 3. Launch and Initial Communication

The intention to prepare a Stockland Neighbourhood Plan was first publicised by the local planning authority, East Devon DC, following the Parish Council's application to have the parish area designated as a Neighbourhood Area on 30th October 2013. The Plan and the neighbourhood planning process was publicly launched in April 2014. Around that date, correspondence, largely by email, was sent to those bodies, agencies and organisations we identified that were thought likely to have influence on, or an interest in, our intentions and outcomes. Apart from informing them of our timetable, we invited an early contribution from those that wished to draw our attention to anything germane at this early stage in the process. This might include:

- informing us of key strategies, plans and programmes (or elements of them which are of relevance to our parish) of which they think we should be aware
- telling us what they think the Neighbourhood Plan should focus on or help to achieve
- any other comments they wish to make to inform the development of a neighbourhood plan for Stockland

A list of the bodies we wrote to is included in Appendix A and a copy of the standard letter we used can be found in Appendix B.

#### 3.1 Responses Received

Correspondence was sent out (by email) in July 2014. All responses received were tabulated and reported to the Steering Group. A report, in the form of a schedule of responses, was also made available on the Stockland Neighbourhood Plan website. A summary of initial responses is set out in Appendix C.

#### 3.2 How were the responses viewed and dealt with?

The responses we received were found to be useful in:

- Identifying which organisations have a particular interest in our area and its Neighbourhood Plan
- Establishing a valuable line of communication
- Receiving general advice on specific topics at the beginning of the planning process
- Identifying where we may need to work harder at establishing useful contact with an organisation for mutual benefit

As a group new to neighbourhood planning, we did take encouragement from the positive responses we received. However, we should record that we were very disappointed by the number of responses received and the many that seemed at the time, not to show interest in something that we felt was very important to the future of our Parish.

As a result of the responses we received we up-dated our database and included any useful advice we received in our evidence base.

## 4. Evidence Gathering

Responses received from the following bodies and organisations provided useful feedback and information that contributed toward our evidence base:

- Blackdown Hill AONB
- Devon County Council
- East Devon District Council
- English Heritage (now Historic England)
- Sport England

Their response was referred to in the Evidence Report that we have produced as part of the neighbourhood planning process and which was made available to the community via the website.

The information received was fully taken account of in analysing the evidence and preparing our draft aims and objectives.

## 5. Sustainability

East Devon District Council and the Blackdown Hills AONB were prime consultees and also assisted consultation and liaison between the Stockland Steering Group and statutory bodies including the Environment Agency and Natural England in respect of requirements for a Strategic Environmental Assessment (SEA) and an Appropriate Assessment in regard to EU Habitats Regulations.

### 5.1 Screening Opinions for Strategic Environmental Assessment and Habitats Regulation Assessment

Two screening exercises were undertaken to ensure that the emerging plan would not have significant environmental impacts or likely significant effects on the protected characteristics of the Blackdown Hills AONB which cover the Neighbourhood Plan area.

An initial screening opinion for Strategic Environmental Assessment was issued by the District Council in November 2014 and consultation was undertaken with statutory bodies by them (English Heritage, Environment Agency and Natural England). A further report was issued by the District Council in March 2015, following this consultation, stating that *“the Stockland Neighbourhood Plan does not require a Strategic Environmental Assessment and the Stockland Neighbourhood Plan is unlikely to have a significant environmental impact. It does not allocate sites for development and the policies are in accordance with the adopted and emerging local plans (which were themselves subject to SEA)”*.

Similarly a screening opinion for an Appropriate Assessment under the Habitats Regulations was issued by the Council in November 2014. It concluded that *“a full Habitat regulations screening is not required, any variations or additions to the Neighbourhood Plan will be subject to a further screening”*. Following consultation by the District Council with Natural England a further report was issued in March 2015 stating that *“the Stockland Neighbourhood Plan does not require a Habitat Regulation Assessment. The Stockland Neighbourhood Plan is unlikely to have an adverse effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010 (d), alone or in combination with other plans and projects. It does not propose a level of development significantly over and above that in the adopted Local Plan and is in accordance with the emerging Local Plan (which was itself subject to HRA)”*.

## 5.2 Sustainability Appraisal

The Stockland Steering Group has carried out a sustainability appraisal based on an agreed framework for both versions of the draft Plan. The results of each appraisal exercise has been made available on the Stockland Neighbourhood Plan website<sup>1</sup> and made public as part of the consultation process alongside the draft Plan.

## 6. Pre-Regulation 14 (Pre-submission stage) Consultation

In February 2015 we wrote to those strategic consultees that had who asked to be sent a copy of the draft Plan in their response to the initial consultation email. We received no responses other than from East Devon District Council at this stage. The organisations we wrote to and the responses we received is set out in appendix D.

## 7. Regulation 14 (Pre-submission stage) Consultation

Neighbourhood Plan regulations require that a statutory consultation period of 6 weeks is undertaken by the responsible body on the final draft plan prior to its submission to the Local Authority in advance of their statutory Regulation 16 consultation.

### 7.1 Drafting the Neighbourhood Plan

The Neighbourhood Plan policies were drafted in close collaboration with:

- East Devon District Council, to ensure that the emerging policies were not in conflict with the National Planning Policy Framework, were aligned to the Local Development Plan and that they were usable in a Development Management context; and with
- The Blackdown Hills AONB to ensure that the policies were in harmony with those that prevail across the whole of the AONB.

Both of these bodies were considered as key statutory consultees under Regulation 14.

### 7.2 Who else was Consulted?

The Regulation 14 consultation is specific about organisations and stakeholders that should be consulted. The legislation requires that prior to submitting the plan to the local planning authority the qualifying body must:

- publicise it in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area
- consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
- send a copy of the proposals for a neighbourhood development plan to the local planning authority.

Our aim was to consult with all identified statutory consultees on the draft Neighbourhood Plan for Stockland thus ensuring we adhered to the requirements of Schedule 1 of the 2012 Regulations. We were assisted in identifying the necessary consultees by East Devon District Council, which has recently produced (July 2015) a helpful document entitled 'Statutory Consultation - Who must we Consult'<sup>2</sup>.

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<sup>1</sup> Insert web reference to SA

<sup>2</sup> <http://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/stage-4-statutory-consultation-and-submitting-the-plan/statutory-consultation-and-submitting-the-plan/>

### 7.3 How were they Consulted?

The Pre-submission consultation period was set as 19th September 2015 to 31st October 2015.

Notification of the pre-submission draft Stockland Neighbourhood Plan and the statutory consultation period was sent by email to all bodies and organisations on our comprehensive consultation list (See Appendix D) with an explanation of what was required for the consultation and the date when responses were required by.

### 7.4 What did the Consultees say?

A full schedule of responses can be found on our website. A summary of the responses is set out at Appendix E.

## 8. Conclusions

In preparing the Stockland Neighbourhood Plan we have striven to establish and maintain a dialogue with those bodies and organisations covered by Schedule 1 of the Regulations and those other bodies and organisations we have identified as having, or likely to have, an interest in our Parish.

The views, comments and suggestions received at each stage of the Neighbourhood Plan have been fully considered and have helped to guide and shape the form of the Plan so that it not only reflects what local people wish to see happen for their area but takes account of how we can share future planning and delivery with outside bodies and organisations so as to realise our aims and objectives.

This Consultation Statement and the supporting appendices are considered to comply with Section 15(2) of part 5 of the 2012 Neighbourhood Planning Regulations.

## Appendix A

### Stockland Neighbourhood Plan Initial List of Consultees:

Ambulance Service  
Blackdown Hills AONB  
BT  
Bus provider – Stagecoach South West  
Canals and Rivers Trust  
Devon County Council (Education)  
Devon County Council (Highways)  
Devon County Council (Libraries)  
Devon County Council (Public Transport)  
Devon County Council (Social Services)  
Devon Wildlife Trust  
Disability Network  
East Devon District Council (Environmental Services)  
East Devon District Council (Housing)  
East Devon District Council (Planning)  
English Heritage  
Environment Agency  
Fire and Rescue  
Health and Wellbeing Board  
Highways Agency  
Home Builders Federation  
Homes and Communities Agency  
Local Enterprise Partnership  
National Housing Federation  
Natural England  
Network Rail  
NFU  
NHS Clinical Commissioning Groups  
Partnership NHS Trust  
Devon & Cornwall Police  
Ramblers' Association  
RSPB  
South West Water  
Sport England  
Transco (Gas)  
Western Power

## Appendix B

### Stockland Neighbourhood Plan Initial Letter to Key 'Strategic' Stakeholders and Statutory Consultees

Dear Sir / Madam,

I am writing to inform you that Stockland Parish Council has commenced the process of developing a neighbourhood plan for the area. As you will be aware, neighbourhood plans were introduced by the Localism Act 2011 and provide the opportunity for the local community to set out its own statutory development plan and policies for its area. East Devon District Council has formally designated the neighbourhood planning area as the administrative boundary of the parish.

We are following a timetable which we hope will see a draft plan ready for submission to East Devon District Council early next year, and the Parish Council is currently developing the evidence base and holding initial 'discussions' with local people, organisations and other key stakeholders and consultees about their views. You can find out more about the neighbourhood plan and process on the village website, [www.Stockland.org.uk](http://www.Stockland.org.uk)

In order to help us ensure that we are aware of all issues relevant to the development of neighbourhood plan, we would be grateful if you will contact us (by replying to this email) should you wish to contribute anything at this early stage in the process. This might include:

- informing us of key strategies, plans and programmes (or elements of them which are of relevance to our parish) of which you think we should be aware;
- telling us what you think the Neighbourhood Plan should focus on or help to achieve; and / or;
- any other comments you wish to make to inform the developing neighbourhood plan.

We are keen to establish a dialogue with you and would be grateful if you can confirm who the most appropriate contact person is for future correspondence on the neighbourhood plan.

If you do wish to contribute anything at this stage, please do so no later than Monday 30th June, as we would like to finish compiling our initial scoping of the evidence base and key issues in early July to inform the next stage of the process. If you do not wish to contribute at this stage, there will be other opportunities to raise issues with us during the development of the neighbourhood plan and you can contact us at any point.

I look forward to hearing from you in due course.

Yours faithfully,

Clerk to Stockland Parish Council

## Stockland Neighbourhood Plan Schedule of Responses

<b>Local Authorities</b>		
East Devon District Council	04/08/14	<i>Please find attached some helpful Neighbourhood Plan guidance from the Historic Environment Team at Devon County Council</i>
Ramblers Association	11/08/14	<ul style="list-style-type: none"> <li>• <i>The network in Stockland is well maintained but sparse</i></li> <li>• <i>some areas could be improved</i></li> <li>• <i>It is very important to maintain and improve the rights of way network as a part of the 'Green Infrastructure'</i></li> <li>• <i>I would urge you to take the opportunity that your Neighbourhood Plan provides to look carefully and review your rights of way network</i></li> </ul>
Stagecoach South West	11/08/14	<i>We don't provide any services in your parish so don't have any particular views - our nearest service being route 4 which runs along the A35</i>
<b>Utility and Energy</b>		
South West Water	28/07/14	<i>Whilst we would have no comment at this time once you have an indication of your intentions for the area we will be happy to assist in terms of the provision of suitable infrastructure</i>
<b>Health</b>		
Royal Devon & Exeter NHS Foundation Trust		
Devon Partnership NHS Trust	07/08/14	<i>We do not have any specific issues at this stage which we would like you to consider</i>
Health & Safety Executive		
NHS East Devon Clinical Commissioning Group		
Devon Health & Wellbeing Board		
Devon County Council Public Health Specialist	11/08/14	<i>It would be very interesting to meet with you at an appropriate point but for the time being it may be useful to refer to the East Devon Public Health plan,</i>
<b>Government Agencies</b>		
Homes and Communities Agency		
Sport England	28/07/14	<i>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide</i>
English Heritage	18/08/14	<i>We would like to take the opportunity of the consultation to outline the range of support English Heritage is able to offer in relation to Neighbourhood Plans....</i>
Highways Agency	12/08/14	<i>The Agency is keen to support the development of neighbourhood plans and the delivery of local growth, and to this end we will welcome the opportunity to comment as your plan progresses to ensure</i>

		<i>that any proposals that may have the impact on the SRN are supported by a satisfactory assessment of traffic impacts and mitigation requirements.</i>
Blackdown Hills Parish Network	11/08/14	<i>There is no doubt that we will respond to your email, however it is unlikely that we will be able to present a considered view until later this month or even into September, and we will contact you then</i>
<b>Emergency Services</b>		
Devon and Cornwall Constabulary		
Devon and Cornwall Police		
Devon and Somerset Fire and Rescue	07/08/14	<i>As you can imagine we have been inundated with requests for involvement in the Neighbourhood Plans across the district. The same requests have been made across the county. Our Service Headquarters departments are looking into the way we respond. Once this is established we will be back in contact.</i>
South Western Ambulance Service	28/07/14	<i>I have had a look at your web page and it is very good indeed, I have copied in my reply to a colleague in Devon County Council who has a special interest in Community Resilience, I hope he is able to help you with the development of your plan.</i>
<b>Environment</b>		
Campaign to Protect Rural England (CPRE)	01/08/14	<i>We very much support the Neighbourhood Plan process, but do not wish to make any specific comments at this stage</i>
Devon Wildlife Trust	30/07/14	<i>Devon Wildlife Trust have passed on your enquiry as we hold biodiversity data for the county, they obviously feel that your community led plan may benefit from information that on statutory or locally designated sites/BAP habitat, and protected or common species to assist in its preparation</i>
Marine Management Organisation	01/08/14	<i>I can confirm that the MMO has no comments to submit in relation to this consultation</i>
<b>Economy</b>		
<b>Housing</b>		
Home Builders' Federation	18/08/14	<i>Cannot get involved as have no funding for this</i>
<b>Other</b>		
National Trust	18/08/14	<i>Cannot get involved</i>

## Appendix D

Pre-Regulation 14 Consultation – 1<sup>st</sup> January – 12<sup>th</sup> February 2015

	East Devon District Council – Planning Dept.	02/15	<i>‘Quarrying and stone processing planning is a county matter and the legislation states that a Neighbourhood Plan cannot have policies related to these. Perhaps you could still include a statement in the Plan to that effect but ultimately you cannot include a policy.’</i>	This relates to ‘Policy NE3 – Impact of Quarrying and Processing of Stone on the Natural Environment’ on page 21 of the NP. Policy NE3 has been removed and replaced by a Statement of Principle.
1.9	East Devon District Council – Planning Dept.	02/15	<i>Statement of Principle – The Focus for Any New Housing Development – ‘You have already future proofed this statement anticipating BUAB removal so that can remain un-amended’</i>	No changes required
1.10	East Devon District Council – Planning Dept.	02/15	<i>Policy CFS1 – New Retail and Commercial Development in Stockland Village – ‘I think that you could remove the reference to built-up areas boundary here without compromising the policy. You make it very clear that development needs to be located within the confines of the village and one of the supporting criteria references the necessity for any proposal coming forward to be well related to the existing built form of the statement’</i>	Changes made - reference to Built Up Area Boundary has been removed
	Blackdown Hills Parish Network		<i>No response</i>	
	Campaign to Protect Rural England		<i>No response</i>	
	Devon County Council Historic Environment Team		<i>No response</i>	
	Devon County Council Public Health Specialist		<i>No response</i>	
	Devon Partnership NHS Trust		<i>No response</i>	
	East Devon Ramblers Association		<i>No response</i>	

Stockland Neighbourhood Plan Reg. 14 Consultee List

**Local Authority Services**

Devon County Council  
Dorset County Council  
East Devon District Council  
Exeter City Council  
Mid Devon District Council  
Somerset County Council  
South Somerset District Council  
Taunton Deane Borough Council  
Teignbridge District Council  
The Planning Inspectorate  
West Dorset District Council  
Yarcombe Parish Council  
Upottery Parish Council  
Cotleigh Parish Council  
Offwell Parish Council  
Widworthy Parish Council  
Dalwood Parish Council  
Membury Parish Council

**Transport and Access**

Civil Aviation Authority  
Cross Country  
Exeter and Devon Airport  
First Devon and Cornwall  
First Great Western  
National Air Control Transport Services  
Network Rail  
Ramblers Association  
Stagecoach South West

**Utility and Energy**

Arqiva (Stockland Mast)  
Broadband Devon  
BT(Openreach)  
National Grid DPM Consultant  
South West Water  
Wales and West Utilities LTD  
Western Power Distribution

**Health**

Devon Health & Wellbeing Board  
Devon Partnership NHS Trust  
Health & Safety Executive  
NHS East Devon Clinical Commissioning Group  
Royal Devon & Exeter NHS Foundation Trust

**Government Agencies**

Blackdown Hills AONB  
Blackdown Hills Parish Network  
Devon and Cornwall Constabulary  
Devon and Cornwall Police  
Devon and Somerset Fire and Rescue  
East Devon AONB Partnership  
English Heritage  
Environment Agency  
Highways Agency

Highways England  
Historic England – South West Region  
Homes and Communities Agency  
Natural England  
Natural England (Devon Team)  
NHS Foundation Trust  
South Western Ambulance Service  
Sport England  
The Planning Inspectorate

**Environment**

Campaign to Protect Rural England (CPRE)  
Canal and River Trust  
Country Land and Business Association  
Devon Local Nature Partnership  
Devon Wildlife Trust  
Forestry Commission  
Garden History Society  
Marine Management Organisation  
NFU  
RSPB South West Regional Office  
Woodland Trust

**Economy**

Association of East Devon Chambers of Commerce  
East Devon Federation of Small Businesses  
Heart of the South West Local Enterprise Partnership

**Housing**

Community Council for Devon  
Devon and Cornwall Housing Association  
Devon Rural Community Council  
Home Builders' Federation  
National Housing Federation  
Sovereign Housing Association

**Other**

Coal Authority  
Community Council for Devon  
Crown Estate Commissioners  
Design Council  
Devon Alzheimers  
Devon Carers  
Devon Faith and Beliefs Forum  
Devon Federation of Women's Institutes  
Devon Rural Community Council  
Living Options Devon (Devon Disability Network)  
Mind (Devon)  
Ministry of Defence  
National Trust  
Plymouth and Devon Racial Equality Council  
Princes Trust South West Regional Office  
Theatres Trust

## Appendix F

Stockland Neighbourhood Plan Schedule of Reg. 14 Responses - 19th September 2015 to 31st October 2015

		Date	Comment	Action
<b>Local Authorities and Parish Councils</b>				
	Cotleigh Parish Council			
	Dalwood Parish Council			
	Devon County Council			
2.30	Dorset County Council		<i>Thank you for consulting Dorset County Council on the Stockland Neighbourhood Plan (Pre submission draft). As the Plan does not raise strategic issues of relevance to this Council we do not wish to offer comments on this occasion.</i>	No changes required
	East Devon District Council – Planning Dept	10/15	<b>SEE SEPARATE TABLE BELOW</b>	
2.11	Exeter City Council		<i>We acknowledge receipt of your email.</i>	No changes required
	Membury Parish Council			
2.29	Mid Devon District Council		<i>Thank you for your email. Your comments have been passed onto our forward planning team for their attention.</i>	No changes required
	Offwell Parish Council			
	Somerset County Council			
	South Somerset District Council			
	Taunton Deane Borough Council			
2.7	Teignbridge District Council	10/15	<i>Thank you for your email which was received today.</i>	No changes required
	Upottery Parish Council			
2.22	West Dorset District Council		<i>Thank you for consulting West Dorset District Council on your Pre-Submission version of the Stockland Neighbourhood Plan. We have no comments to make on the plan but wish you good luck with the examination.</i>	No changes required
	Widworthy Parish Council			
	Yarcombe Parish Council			
<b>Transport and Access</b>				
2.8	Civil Aviation Authority	10/15	<i>Thank you for your enquiry, which we will aim to respond to within 10 working days. However, should we require further technical advice we may need to forward your enquiry to the most relevant area of the CAA for advice, or ask them to respond to you directly, and this may take longer.</i>	No changes required
	Cross Country			
	First Devon and Cornwall			
	First Great Western			
	National Air Control Transport Services			
	Network Rail			
	Ramblers Association			

	Stagecoach South West			
<b>Utility and Energy</b>				
2.26	Arqiva (Stockland Mast)		<i>Thank you for your enquiry for our services. We monitor this mailbox at regular intervals between 0900 – 1700 GMT, Monday to Friday and will respond to your query within 1 working day</i>	No changes required
	BT (Openreach)			
2.31	National Grid DPM Consultant		<p><i>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</i></p> <p><i>Specific Comments</i></p> <p><i>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines.</i></p> <p><i>National Grid has identified the following High Pressure Gas Transmission pipeline as falling within the Neighbourhood area boundary:</i></p> <ul style="list-style-type: none"> <li><i>• FM20 - Barrington to Ottery St Mary</i></li> </ul> <p><i>From the consultation information provided, the above gas transmission pipeline does not interact with any proposed development sites.</i></p> <p><i>Key resources / contacts</i></p> <p><i>National Grid has provided information in relation to electricity and transmission assets via the following internet link:</i></p> <p><i><a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></i></p> <p><i>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure</i></p>	comment on 2.23 response, which is related
	South West Water			
2.20	The Coal Authority		<p><i>Thank you for your email of the 16 September 2015 consulting The Coal Authority on the above NDP. The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</i></p> <p><i>As you will be aware your designated Neighbourhood Plan area is outside of the defined coalfield; and so we have no specific comments to make on your emerging Neighbourhood Plan.</i></p> <p><i>In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide us with any future drafts or updates to the emerging Neighbourhood Plan.</i></p> <p><i>Please use this letter as evidence for the legal and procedural consultation requirements.</i></p>	No changes required
	Wales and West Utilities LTD			
	Western Power Distribution			
<b>Health</b>				
2.13	Devon Carers	09/15	<i>Thanks for your email, we hope to respond shortly.</i>	No changes required
	Devon Health & Wellbeing Board			

	Devon Partnership NHS Trust			
2.23	Health & Safety Executive		<i>Thanks for sending us this notification. As far as I can tell from the map on your website the proposed development intersects the consultation zone for a high pressure gas pipeline. As a result, HSE will need to be consulted (by the local planning authority) once there is more detail available of what will be built, and where.</i>	No changes required (clarified by EDDC in email of 14th October 2015 – see also comment 2.32 which is related)
	NHS East Devon CCG			
	Public Health Specialist Lucy O'Loughlin			
	Royal Devon & Exeter NHS Foundation Trust			
<b>Government Agencies</b>				
2.43	Blackdown Hills AONB		<i>1. Welcome the importance attached to natural environment, the AONB, AONB management plan and other guidance documents as central tenet of the plan. (As such this comment may equally apply in support of other policies, e.g. NE4, ELC1) 2. At the bottom of part 2: page 4 there is a reference to screening – I would prefer to avoid such references and perhaps use 'landscaped' here instead.</i>	Replaced 'screened' with 'landscaped'.
2.44	Blackdown Hills AONB		<i>Welcome the recognition of locally distinctive features such as traditional finger posts.</i>	No changes required
2.45	Blackdown Hills AONB		<i>Welcome the creation of a local list of heritage assets, although I would have thought it might be relevant across the parish not just in the hamlets.</i>	This is covered in BHE1, no changes required.
2.46	Blackdown Hills AONB		<i>1. Support the endorsement of the AONB's design guide through its integration in the plan. 2. Part ii of the policy is relevant to 'any development' – I wonder if this works for all types of development; farm buildings for example, and which I note are subject to a separate policy, and other necessarily utilitarian structures?</i>	BHE3 – the two points have been amalgamated into one and the text has been amended accordingly. See Response 2.53 for more detail
2.42	Historic England		<i>Thank you for your consultation on the pre-submission Stockland Neighbourhood Plan. This is a most impressive plan in the scope and depth of understanding it displays of the area's historic environment. This is clearly valued by your community and comprehensively reflected in the range and detail of the policies which the Plan contains. I can therefore confirm that that we have no comments to make on the Plan other than to congratulate you on the progress achieved to date, with best wishes for its ultimate success.</i>	No changes required
2.19	Environment Agency		<i>Thank you for your email. I have passed your enquiry to our Sustainable Places team for the relevant area and they will be in touch with you shortly.</i>	No changes required
2.21	Highways Agency		<i>Thank you for your email of 17 September providing Highways England with the opportunity to comment on the pre-submission draft neighbourhood plan for Stockland Parish. Highways England are responsible for operating, improving and maintaining the strategic road network, which in this case includes the A303, A30 and A35 which are located to the north, west and south respectively of the plan area. We are satisfied that the proposed policies within the draft plan are unlikely to lead to development that will cause a severe impact on the strategic road network. We therefore</i>	No changes required

			<p><i>have no specific comments to make on the draft, although in general terms we welcome proposals to enable limited growth to reflect local needs and support community facilities, and to promote sustainable transport links and local rights of way which should help to reduce the need for out-commuting and the reliance on the private car.</i></p> <p><i>These comments do not prejudice any future responses we may make on site specific applications as they come forward through the planning process, which will continue to be considered by Highways England on their merits in line with prevailing policy.</i></p> <p><i>If it would be helpful to discuss any of the above, please don't hesitate to contact me.</i></p>	
	Homes and Communities Agency			
2.70	Natural England (Devon Sustainable Development Team)		<p><i>Natural England welcomes this Neighbourhood Plan (NP) and its emphasis on the special environmental qualities of Stockland Parish, including its considerable landscape and biodiversity assets. We are pleased to see that the primacy of retaining, conserving and enhancing the natural environment as a basis for achieving sustainable development in the parish is evident throughout the plan.</i></p> <p><i>The Neighbourhood Plan sets a framework for development within the parish but does not allocate specific sites for development. The spatial distribution of housing in the village is covered in the East Devon Villages Plan (Policy 37: Residential Land Development in Stockland) which allocates the site, E157. The location of any new housing in the Parish within the built up area boundary of the village is also encouraged in the NP. We agree that these small-scale proposals, with careful planning and mitigation if required, any impacts on the special qualities of the village and the Blackdown Hills AONB can be minimised.</i></p> <p><i>River Axe Special Area of Conservation (SAC)</i>  <i>As previously noted, development in Stockland Parish has the potential to affect the SAC's interest features, mainly through increasing nutrient levels within the SAC. However, Natural England is satisfied that nutrient levels in the SAC will be addressed via the interim Diffuse Water Pollution Plan (DWPP), which has been prepared to take action to reduce phosphorous entering the system from diffuse sources.</i></p> <p><i>NE1 – Retaining and Enhancing the Natural Beauty of our Parish</i>  <i>Natural England supports the emphasis on development which will not have adverse impacts on landscape and biodiversity and indeed which takes advantage of any opportunities to enhance the parish's natural environment.</i></p> <p><i>TRA3 – Rights of Way</i>  <i>Natural England supports the enhancement of footpaths and provision of new or extended routes within the parish which will encourage greater access to the countryside and reduce dependence on private motor vehicles.</i></p> <p><i>ELC1 – Small Scale Renewable and Low Carbon Energy Schemes</i>  <i>Natural England welcomes this policy that seeks to support small-scale and unobtrusive renewable or low carbon energy schemes that fit in with the parish's AONB location.</i></p> <p><i>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</i></p> <p><i>For any queries relating to the specific advice in this letter only please contact Darren Horn. For any new consultations, or to provide further information on this consultation please</i></p>	No changes required

			<p><i>send your correspondences to <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</i></p> <p><i>We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</i></p>	
	Sport England			
	The Planning Inspectorate			
<b>Emergency Services</b>				
	Devon and Cornwall Constabulary			
	Devon and Cornwall Police			
	Devon and Somerset Fire and Rescue			
	NHS Foundation Trust			
2.18	South Western Ambulance Service		<p><i>I am writing to acknowledge your draft plan. At this point I do not have the capacity to carry out a full review and provide comments but I do acknowledge the work that you have done and I would ask for access to the electronic plan when it is finally completed.</i></p> <p><i>Congratulations on what seems to be a well-constructed and very informative neighbourhood plan.</i></p>	No changes required
<b>Environment</b>				
	Blackdown Hills Parish Network			
	Campaign to Protect Rural England (CPRE)			
	Canal and River Trust			
	Country Land and Business Association			
	Devon Local Nature Partnership			
	Devon Wildlife Trust			
	Forestry Commission			
	Garden History Society			
	Marine Management Organisation			
	NFU			
2.16	Ramblers Association		<p><i>I acknowledge receipt of your email, which has been forwarded to Ted Swan, Secretary of our East Devon group for action.</i></p>	No changes required
	RSPB South West Regional Office			
2.15	Woodland Trust		<p><i>Many thanks for consulting the Woodland Trust on the draft submission of the Stockland Parish Plan.</i></p> <p><i>The Woodland Trust is very supportive of the concept of neighbourhood planning as an important mechanism for embedding trees into local communities, as such we are very supportive of the policies set out in your plan, particularly the inclusion of the ancient woodland inventory data.</i></p> <p><i>I would however like to add a number of points which we believe could further enhance your plan.</i></p> <p><i>We are particularly supportive of the aspiration set out in Policy NE1a) Retain and enhance the existing beauty of the</i></p>	<p>We believe that Policy NE1 ii) is adequate as it stands. No changes required.</p> <p>Policy NE3 has been changed from being a Policy to being a Statement of Principle, as per advice received from EDDC (refer to the</p>

			<p>parish by encouraging the planting of native trees and hedges along with the preservation of the existing Devon banks. There is scope however to make this more specific, for example by linking it to housing policy requiring new street trees to be planted with every new dwelling. You could also ask for a 2:1 (or more ambitious target) planting ration for any trees lost as a result of development. You may find the following document useful:  <a href="http://www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/">http://www.woodlandtrust.org.uk/publications/2015/07/residential-developments-and-trees/</a>  In addition we would like to see Policy NE3 go beyond considering the impacts of quarrying and also consider the restoration opportunities particularly through tree planting to connect the scattered ancient woodland in the parish.  <a href="http://afterminerals.com/index.aspx">http://afterminerals.com/index.aspx</a>  We would like to take this opportunity to draw your attention to the Woodland Trust's neighbourhood planning microsite:  <a href="https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/">https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/</a> which may give you further ideas.  You may also be interested in our free community tree packs:  <a href="http://www.woodlandtrust.org.uk/plant-trees/in-your-community/">http://www.woodlandtrust.org.uk/plant-trees/in-your-community/</a>  If I can be of any assistance please do not hesitate to get in touch, I would be more than happy to discuss this further with you</p>	related response 2.33).
<b>Economy</b>				
	Assoc. of East Devon Chambers of Commerce			
	East Devon Federation of Small Businesses			
	Heart of the SW Local Enterprise Partnership			
<b>Housing</b>				
	Community Council for Devon			
	Devon Rural Community Council			
2.25	DCH Group		<i>Thank you for contacting us. The information you've provided has been logged and passed to your local team</i>	No changes required
	Home Builders' Federation			
2.28	National Housing Federation		<i>Thanks for your email re; Stockland Neighbourhood Plan consultation. The National Housing Federation is not able to comment on this local matter.</i>	No changes required
2.24	Sovereign Housing Association		<i>Thank you, your enquiry has been forwarded to our contact centre</i>	No changes required
<b>Other</b>				
2.12	Church of England Diocese of Exeter	09/15	<i>I am currently out of the office and will return on Monday 21st September when I will respond to your email.</i>	No changes required
	Community Council for Devon			
	Crown Estate Commissioners			
	Design Council			
	Devon Faith and Beliefs Forum			
	Devon Federation of Women's Institutes			

	Devon Racial Equality Council			
	Devon Rural Community Council			
	Living Options (Devon Disability Network)			
	Ministry of Defence			
	National Trust			
2.27	Princes Trust South West Regional Office		<i>Thank you for your email. If you are enquiring about volunteering positions within The Prince's Trust, or have sent in an application form, please take this as receipt of receiving your email.</i>	No changes required
	Theatres Trust			

Comments on Pre-Submission Draft from East Devon District Council			
No.	Section	Comment	Response
2.49	General Presentation	<p>The plan is attractive and makes good use of photographs, images and colours throughout. The writing style is generally in 'plain english' and accessible without compromising the professional feel of the document as a whole. Although generally easy to navigate, in the next version it would be a good idea not to separate the Plan into 4 different documents, particularly as only the first section has a contents page and the pages are not numbered.</p> <p>Consideration should also be given to the use of numbered paragraphs to aid with navigation. Community Actions and Projects have been placed throughout the plan. Although these have been formed through community consultation and offer great value as identifying issues that the parish council and community want to address, as they are not planning policies they hold no weight in the decision making process. We have found in our previous referendum experience that some residents were under the impression that the community actions formed a part of what they were voting in favour of; this caused some confusion for some members of the community. It might be worthwhile considering placing these into a separate document or appendix to the plan to avoid this situation occurring again.</p>	<p>The division into 4 parts was due to email restrictions. We have now merged these into 1 document, but for technical reasons we may have to revert to a split version.</p> <p>The Steering Group did not design the layout and format of the document. We have always assumed that Stuart Todd Associates (STA) used a template as a starting point, especially as we were doing this plan as part of a Blackdown Hills parishes' initiative.</p> <p>The bottom line is that the Steering Group were presented with the document as currently configured by STA.</p> <p>Steering Group decided to keep the community actions within the Plan.</p>
2.50	Introduction	<p><b>The Community's Plan</b> This section offers a useful and fairly concise introduction to the plan.</p> <p><b>The Plan Area</b> This section offers useful background information on the parish including location, population and various features that are important within the parish. This effectively introduces the reader to the parish and utilises sometimes poetic elements, adding to the narrative of the Neighbourhood Plan.</p> <p><b>Suggested amendments:</b></p> <ol style="list-style-type: none"> <li>1. Whilst the map is useful, a colour version might be clearer.</li> <li>2. When stating 'The Neighbourhood Plan area (the whole parish) was approved by East Devon District</li> </ol>	<p>We have changed the original bullet points in the <i>suggested amendments</i> contained in the 'Comment' column to numbers. The numbered responses correspond to these.</p> <p>1. The electronic version of the Plan contains a colour map. No changes required.</p>

		<p><b>Council following consultation’ it would be useful to provide a date.</b></p> <p><b>How have we got here?</b> This section provides a useful context for how the plan was produced and includes examples of the various methods of consultation they have undertaken throughout the process. <b>Suggested amendments:</b></p> <p><b>3. The final paragraph of this section includes an error stating that the next version of the plan will be the pre-submission which will need to be amended.</b></p> <p><b>Our Evidence Base and Sustainability Appraisal</b> This provides a good background as to the research that has been undertaken to support the policy approach and the need to undertake an SA <b>The Plan’s Status</b> This provides a useful introduction on the status that the plan will hold once adopted, it makes good use of graphics to illustrate the point. <b>Suggested amendments:</b></p> <p><b>4. Para 3- should be incorporated into the 1st paragraph when discussing that the Neighbourhood Plan will sit with other policy documents relevant to the area.</b></p> <p><b>Sustainable Development</b> This section provides a fairly accurate description of the presumption in favour of sustainable development which forms the golden thread that runs through plan and decision making and the consequences on this for neighbourhood planning. <b>The Structure of Our Plan</b> This section provides a useful explanation of how the policies will be presented in the plan.</p> <p><b>Delivering our aims and objectives</b> The first three paragraphs of this section describe how the aims and objectives of the plan will be delivered; through community actions and planning policies. The remaining paragraphs offer general comments on what the plan will have to take into account throughout its production and include large quotations from National Planning Policy Guidance and the AONB management plan. Whilst it provides interesting background information, it is difficult to see how these paragraphs add any further detail as to how the aims and objectives will be delivered. This detracts from the presentation and the general narrative flow of the plan. It is understood that the plan producers have undertaken a sustainability appraisal (SA) of the plan, one of the tasks for SA is to undergo a review of plans and programmes that are relevant and should be taken into account throughout plan production. It is therefore considered that the SA is a more suitable location for this information. <b>Suggested amendments:</b></p> <p><b>5. Remove paras 4-10 of this section and cover in the SA.</b></p>	<p>2. Date is 16<sup>th</sup> Aug 2013. Document changed.</p> <p>3. Changes have been made.</p> <p>4. Change made.</p> <p>5. Paras.4-10 removed from the NP and are included in the Sustainability Appraisal</p>
2.51	Vision, Aims and objectives	The vision and aims are concise, clear and well presented. They recognise the need for development whilst retaining the special natural and built characteristics of the parish. In this regard it is in general conformity with relevant national and local strategic policies that seek to balance	No change

		<p>environmental and heritage protection with opportunities for appropriate levels of growth.</p> <p>Whilst the chapter intimates that it will cover the objectives, an explanation that these will instead be set out in each topic section later in the plan would be helpful. A useful list of the aims, objectives, policies and community actions is later provided in Appendix 1.</p>	
2.52	Natural Environment	<p>This chapter opens with the rather confusing paragraph explaining that the natural environment is the most important priority identified through consultation, and therefore attempts to set up a hierarchical structure whereby policies related to the natural environment should be given a higher consideration over other policies in the Plan.</p> <p>The NPPF emphasises the need to maintain a balance between environmental, social and economic considerations in order to achieve sustainable development. The planning system does not allow priority to be given to one particular dimension over another as all policies should be considered together when reaching a decision on a planning application.</p> <p><b>Suggested amendments:</b></p> <p><b>6. Remove the first paragraph.</b></p> <p><b>Introduction</b></p> <p>This provides a good background of the parish with regards to the state of the natural environment within Stockland, successfully expressing the natural environment is one of the major assets in the parish. It includes a map of various recognised biodiversity sites. Although useful, the key is slightly confusing in that it refers to 3 designations; County Geological Sites, Sites of Special Scientific Interest and Blackdown AONB, that are either not present in the parish or not expressed on the map.</p> <p><b>Suggested amendments:</b></p> <p><b>7. Amend map titled ‘Stockland biodiversity sites’ to better express designations or remove designations not present in the parish from the key.</b></p> <p><b>Policy NE1- Retaining and Enhancing the Natural Beauty of our Parish-</b></p> <p>This section provides a persuasive justification as to why a policy for protection of the natural environment is necessary in the parish. It explains that whilst policies already exist that protect the environment, the addition of a policy would allow locally specific issues to be tackled including the protection of Devon banks and hedgerows.</p> <p>The policy seeks to ensure that there are no adverse impacts on the natural environment including landscape and biodiversity. It is in general conformity with the Local Plan, which seeks to protect the natural environment and landscape. Being situated in the AONB, the landscape is already offered considerable protection under Local Plan strategy 46, which states that development will only be permitted where it ‘conserves and enhances the landscape character of the area’. Additionally, Strategy 47 offers protection for biodiversity, stating that development proposals will need to ‘conserve the biodiversity and geodiversity value of land...and minimise fragmentation of habitats’ and ‘incorporate beneficial biodiversity conservation features’ It is therefore difficult to recognise where criteria points i) and ii) of Neighbourhood Plan policy NE1 go further than Local Plan strategies 46 and 47. Criteria point iii) requires development proposals to demonstrate</p>	<p>6. Paragraph removed</p> <p>7. The map was provided by Blackdown Hills AONB. No changes required</p> <p>Policy NE1 New clause has been added to the policy to support development that does not adversely affect air quality or produce excess smell or dust</p>

		<p>that alternative solutions have been considered when change to Devon hedgerows is unavoidable; this is considered to expand upon but not conflict with existing local plan policy, which only requires no net loss in the quality of hedgerows resulting from development in policy D3.</p> <p>Our Environmental Health department also wished to advise of the potential of including a reference to air quality, smell and dust within this policy, as they are key factors to consider when protecting the natural environment.</p> <p><b>Policy NE2- Supporting and Protecting our Turbaries</b> This section provides details of the importance of turbaries to the community in terms of their landscape, biodiversity and historic value. It uses a map to identify the locations of each of the turbaries that warrant protection. The policy is straightforward and easy to interpret for decision-makers, no changes are recommended. There is no equivalent policy in the Local Plan.</p> <p><b>Policy NE3- Impact of Quarrying and Processing of Stone in the Natural Environment</b> Quarrying and stone processing is a ‘county matter’. The Localism act explicitly forbids Neighbourhood Plans from including policies relating to county matters, as they fall under the remit of excluded development. Whilst the plan can identify quarrying as an issue and potentially include a community action related to it; they cannot include a planning policy related to excluded development.</p> <p><b>Suggested amendments:</b></p> <p><b>8. Remove policy NE3 or produce a community action related to quarrying in its place</b></p> <p><b>Policy NE4- Preserving Tranquility and Our Dark Skies 5</b> This section provides a particular emphasis on the importance of these features of the AONB, on the basis of there being a lack of policy coverage in the Local Plan in relation to protecting the tranquillity of the parish and its dark skies. It is in general conformity with the Local Plan, which seeks to protect and enhance the distinctive environment in AONBs. In the policy, criteria point iii) does not make sense and appears ultimately unnecessary- a significant impact once mitigated will no longer be significant.</p> <p><b>Suggested amendments:</b></p> <p><b>9. Delete criteria point iii) from policy.</b></p>	<p>Policy NE2 – no changes required</p> <p>8. Policy NE3 has been removed and replaced with a <i>Statement of Principle</i></p> <p>9. Policy NE4 iii) has been removed</p>
2.53	Built and Historic Environment	<p><b>Introduction</b> This section provides useful relevant background information regarding the built and historic environment of Stockland Parish.</p> <p><b>Policy BHE1- Protecting Our Valued Historic and Heritage Assets in Stockland Parish</b> The justification for the policy is effective and provides further details as to particular assets of historic importance to the village and the wider parish. The policy is generally well constructed and in general conformity with the East Devon Local Plan Strategy 49, which seeks to conserve and enhance the physical and cultural heritage of the district. It was felt that the use of the term ‘heritage and historic’ assets was unnecessary and therefore we recommend the deletion of one word.</p> <p><b>Suggested amendments:</b></p>	<p>10. BHE1 – The text has been changed and also the title to</p>

		<p><b>10. Delete the word ‘historic’ so the policy reads ‘...and other valued archaeological and heritage assets in the parish...’.</b></p> <p><b>Policy BHE2- Protecting Our Hamlets Historic Identity</b> The policy has been brought to give weight to locally identified heritage assets. This is in conformity with East Devon Local Plan Strategy 49, which seeks to conserve and enhance the physical and cultural heritage of the district. Presumably, this is referring to those assets in the Local List. It is therefore suggested that the following amendments are made to reflect this. <b>Suggested amendments:</b> <b>11. Amend policy to read ...development proposals affecting heritage assets identified in the Local List will only be supported where they...</b></p> <p><b>Policy BHE3- Maintaining the Built Character of Our Parish through High Quality Design</b> This policy has been brought forward as a means of ensuring that design of any new development is appropriate to the existing character of the settlement. Reference is made to the principles and guidance contained within the Blackdown Hills AONB Design Guide and the policy provides additional weight to these. This is a pragmatic approach and conforms with Local Plan policy which seeks to ensure high quality design from new development. The policy itself contains a repetition by including the statement that development proposals will <i>‘be supported where they are of high quality design’</i> in both criterion. We suggest that these be incorporated into a single statement in the opening sentence of the policy along the lines suggested below: <b>Suggested amendments:</b> <b>12. Delete repetition and incorporate into a single statement to read: ‘To ensure that new development is of high quality design and sympathetic to the traditional built character of the parish:’</b></p>	<p>bring it in line with the new wording</p> <p>11. Currently we do not have a list of these assets at Parish level. There is a Community Action (CA11) to produce this list. Therefore we cannot make the suggested amendment</p> <p>12. BHE3 – Changes have been made.</p>
2.54	Housing and Population	<p>This section provides a useful background to the current makeup of housing in Stockland parish. When discussing the East Devon Local Plan and the supplementary Villages Development Plan Document, incorrect reference is made to the village retaining its Built-up area boundary in the parish and the recommendation of 5 new dwellings to be built in the village in the next 15 years; this is no longer the case. The position of the Local Plan has changed and the latest iteration of the Local Plan (March 2015) no longer considers Stockland as suitable to sustain further development under Strategy 27, due to its limited range of services and facilities. This will need to be amended to reflect the current situation. <b>Suggested amendments:</b> <b>13. Amend final paragraph to reflect current situation of Stockland in Strategy 27 of the Local Plan.</b></p> <p><b>Statement of Principle- The Focus for Any New Housing Development</b> The document includes what it terms a ‘statement of principle’, which is an endorsement of existing Local Plan Policy in relation to the built-up area boundary. Notwithstanding the fact that Stockland is no longer planned to have a ‘built-up area boundary’ in the Local Plan, the statement of principle holds no weight in the decision making process but is presented as a planning policy and therefore causes confusion regarding the level of status it</p>	<p>13. The final paragraph has been replaced to reflect the current situation</p>

		<p>should hold. As the information contained within the principle is largely incorrect we suggest its removal and transference of any relevant information into the supporting text.</p> <p><b>Suggested amendments:</b></p> <p><b>14. Remove the statement of principle and transfer any relevant and correct information into the supporting text.</b></p> <p><b>HP1 – Meeting Demonstrable Local Needs on Local Exceptions Sites</b></p> <p>Again, this section is dated in that it refers to Stockland as being a suitable location for small scale growth of 5 dwellings during the lifespan of the Plan. This will need to be amended to reflect the current position.</p> <p>The policy brought forward refers to Local Needs Exceptions sites outside the village in the first sentence. In the current version of the draft Local Plan the village would now be included under the exceptions policy due to the loss of the built up area boundary for Stockland. Reference is also made in criteria point ii) to being in accordance with Local Plan Exceptions policy H5 (now Strategy 35). If this policy is to go forward amendments will need to be made to bring this up-to-date.</p> <p>Although the policy, once amended, would be in conformity with the Local Plan, it is difficult to see the value it adds to the current Local Plan policy as they cover the same ground. Neighbourhood Plans should not be used to duplicate or restate existing policy and we therefore recommend its removal with any relevant elements transferred to the supporting text.</p> <p><b>Suggested amendments:</b></p> <p><b>15. Remove Policy HP1 and transfer any relevant and correct information into the supporting text.</b></p>	<p>14.</p> <p>15.</p>
2.55	Community Facilities and Services	<p>This section provides useful local details on the range of facilities that the community offers, including some priorities for additional facilities in the future.</p> <p><b>Policy CFS1 – New Retail and Commercial Development in Stockland Village</b></p> <p>This policy brings forward the desire to see additional retail development in Stockland to meet local needs. It is in conformity the Local Plan, which seeks to increase the vitality of rural areas without harming the local environment or existing businesses. Historically, in East Devon there has been a trend of increasing numbers of larger out-of-town retail areas which have served a greater than local need and resulted in some detracting from existing centres. Although a criteria is present which states that the proposal should not harm existing businesses we would suggest a keener focus on catering the offering towards a local need, as suggested below.</p> <p><b>Suggested amendments:</b></p> <p><b>16. Addition of the condition that ‘each unit will not exceed a scale to serve more than the local area’</b></p> <p><b>Policy CFS2 – Improvements to Existing Local Community Facilities, Amenities and Assets</b></p> <p>This policy seeks to ensure that existing local facilities can be enhanced or improved where a need arises. It is in conformity with the Local Plan, which seeks to maintain the vitality of existing communities, whilst in scope it is similar to Local Plan policy RC6 but appears to be more relaxed as it includes fewer criteria to be acceptable.</p>	<p>16. Text amended as suggested</p>

		<p><b>Policy CFS3 - Loss of Local Community Facilities, Amenities and Locally Valued Assets through Redevelopment</b>  Policy CFS3 seeks to ensure that any loss of a facility is justified. This does further than Local Plan policy RC6 by requiring consultation to be held with the local community before an application is approved. Although the motivation is understandable, consultation is undertaken as part of the application process regardless of this criteria and no further detail has been provided as to the level of consultation required, so it is difficult to see the further value this criteria adds.</p> <p><b>Policy CFS4 – The King’s Arms Inn</b>  This policy provides support for development that enables the King’s Arms to serve as a community hub. Although the King’s Arms is a listed building, other policies in the plan will protect the significance of the asset. The policy is in conformity with the Local Plan, which seeks the continued viable use of heritage assets and also promotes rural vitality.</p> <p><b>Policy CFS5 – Stockland Church of England Primary Academy</b>  This policy seeks to ensure that Stockland primary school can expand for educational or community purposes. This is in conformity with the Local Plan, where policy provides for new and extended community facilities in the countryside but only where a need for the facility has been proven. To avoid the possibility of unnecessary expansion we would recommend an inclusion of an additional criterion to this policy related to need.</p> <p><b>Suggested amendments:</b>  <b>17. Amend policy to read along the lines of ‘...which serve an educational and / or community purpose, will be supported where a need for the facility has been proven and they do not have an adverse impact on the special character of the area’s natural and built environments.’</b></p>	<p>17. CSF5 – text amended as suggested.</p>
2.56	Transport and Access	<p><b>Policy TRA1 – Off-road Car Parking</b>  This policy seeks to tackle a growing issue in Stockland regarding the number of households parking on the carriageway in the village by promoting the use of additional off-road parking spaces. This is in general conformity with the Local Plan strategy, which seeks to provide adequate car parking commensurate with the type, size and location of development occurring.</p> <p><b>Policy TRA2 – Vehicular Access and Egress Arrangements</b>  This policy seeks to protect the local environment for proposals which require new or improved vehicular access. It is in conformity with the Local Plan, which seeks to protect the natural environment whilst ensuring pedestrian safety through the adequate provision of visibility splays.</p> <p><b>Policy TRA3 – Rights of Way (Public Footpaths, Bridleways, Byways, Unclassified Roads and Other Trails)</b>  Policy TRA3 seeks to promote improved and additional rights of way within the parish. It is in conformity with the Local Plan, which promotes routes for pedestrians and cyclists within and through new development schemes. The wording of the criteria iii), however will require amending as it is not a function of the planning system to prevent individuals acting illegally.</p> <p><b>Suggested amendments:</b>  <b>18. Amend criteria policy iii) to remove reference to illegal use of footpaths, cycleways and bridleways</b></p>	<p>18. TRA3 text amended</p>

2.57	Economy and Employment	<p><b>Policy EE1 – Super-fast Connectivity</b>  This policy seeks to promote the development of super-fast broadband infrastructure in the parish. It is in general conformity with the local plan, which seeks to promote the accessibility of community services. Criteria point ii) requires all new residential, educational and business premises to provide for high speed broadband. There are parts of the parish where high-speed broadband infrastructure is not installed, making it impossible for new development to install high-speed broadband in individual premises. This policy is therefore unenforceable or if enforced would rule out development in large parts of the parish where development may otherwise be acceptable.  <b>Suggested amendments:</b>  <b>19. Remove criteria point ii)</b></p> <p><b>Policy EE2 – Conversion of Agricultural Buildings</b>  This policy seeks to encourage the diversification of agricultural businesses, it is in general conformity with the local plan, which under strategy 28 seeks to encourages agricultural and traditional rural enterprises and add value to rural produce and promoting the reuse of rural buildings for business purposes.</p> <p><b>Policy EE3 – Traditional Farming</b>  This policy seeks to ensure that new development proposals on farmland protect and enhance traditional farming practices whilst ensuring no harm to the natural environment. It is in general conformity with local plan strategies, which seeks to ensure that rural diversification and development which complement or be compatible with the existing agricultural operations in the area. Criteria point ii) duplicates verbatim the emerging Local Plan policy D7, minus a number of amendments following Local Plan hearing sessions. Consideration should be given as to whether criteria point ii) should be kept as the Neighbourhood Plan should not be used to replicate Local Plan policy.  <b>Suggested amendments:</b>  <b>20. Consider removing criteria point ii) as it duplicates emerging Local Plan policy D7.</b></p>	<p>19. Policy EE1 criteria point ii) has been removed</p> <p>‘Traditional Farming’ as a title has been changed to ‘Farming and other rural businesses’</p> <p>20. Policy EE3 criteria ii) has been removed.</p>
2.58	Energy and Low Carbon	<p><b>Policy ELC1 - Small Scale Renewable and Low Carbon Energy Schemes</b>  This policy seeks to promote small scale renewable energy schemes without damaging the natural environment and the character of the Blackdown Hills AONB. It is in conformity with emerging Local Plan strategy 39, which supports the development of renewable energy schemes in principle, subject to satisfactory mitigation.</p> <p><b>Policy ELC2 - Large Scale Renewable and Low Carbon Energy Schemes</b>  Similar to policy ELC1 this seeks to protect the environment by ensuring that there is no damage to characteristics of the AONB through the construction of large scale renewable and low carbon schemes. Whilst not promoting large scale renewable energy, it does not prevent development of schemes coming forward should they demonstrate that they have mitigated any adverse impact. In this regard it is in general conformity with Local Plan strategy 39.</p>	No changes required