

# **Bishops Clyst Neighbourhood Plan**

## **Consultation Statement – Part 2**

### **Statutory and Strategic Consultees' Consultation**



**Bishops Clyst Parish Council**

**May 2016**



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# Bishops Clyst Neighbourhood Plan

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

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## 1. Introduction

This Consultation Statement has been prepared by the Bishops Clyst 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 Bishops Clyst Neighbourhood Development Plan.

## 2. Summary of Consultation Approach to Statutory Consultees

It was decided to make the earliest contact those bodies and organisations that are defined as a consultation body under the terms of schedule 1 of the Neighbourhood Plan Regulations 2012. With the help of our consultants and, East Devon DC we prepared a contact list of all bodies and organisations that serve or provide services to the Parish.

The aims of the Bishops Clyst Neighbourhood Plan consultation process were to:

- ensure that the relevant statutory and strategic bodies and organisations were aware of our intention to produce a neighbourhood plan for the Parish of Bishops Clyst
- ‘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 strategic 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 Bishops Clyst 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 in October 2013. The Plan and the neighbourhood planning process was publicly launched in August 2014. In October 2014 correspondence, largely by email, was sent to 47 bodies and organisations that were thought likely to have an interest in our intentions and outcomes. Apart from informing them of our timetable we invited an early contribution 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 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 Bishops Clyst

A list of all the bodies we wrote to is included in Appendix A. A copy of the standard letter sent to them can be found in Appendix B.

#### 3.1 Responses Received

All responses received were tabulated and reported to the Steering Group. A schedule of respondents and a summary of initial responses is set out in Appendix C.

#### 3.2 How were the issues and concerns responded to?

No issues or concerns were raised. In general, the responses set out the position of the body concerned to Neighbourhood Planning and offered sources of advice for assistance in producing the Plan.

#### 4. Evidence Gathering

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

- Devon Wildlife Trust
- Devon Biodiversity Records Centre
- Devon County Council - Highways
- Devon County Council – Historic Environment Team
- East Devon District Council
- Historic England
- Natural England
- Sport England
- Ramblers Association

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 DC was the prime consultee and also assisted consultation and liaison between the Bishops Clyst 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 Neighbourhood Plan area.

A screening opinion for Strategic Environmental Assessment was issued by the District Council in September 2015 and consultation was undertaken with statutory bodies by them. An email letter was issued by the District Council on 27<sup>th</sup> October 2015, following this consultation, with an accompanying report concluding that no formal Strategic Environmental Assessment would be required for the Plan.

Similarly, a screening opinion for an Appropriate Assessment under the Habitats Regulations was issued by the Council in September 2015. Following consultation by the District Council an email letter was issued on 27<sup>th</sup> October 2015 with an accompanying report concluding that no formal Strategic Environmental Assessment would be required for the Plan.

### 5.2 Sustainability Appraisal

The Bishops Clyst Steering Group has carried out a sustainability appraisal based on an agreed framework for both a first draft version and the pre-submission version of the Neighbourhood Plan. The results of each appraisal exercise has been made available on the Bishops Clyst Neighbourhood Plan website and made public as part of the consultation process alongside the draft Plan.

## 6. Draft Plan Consultation

In September 2015 a copy of the draft Plan was sent to a select number of bodies that were thought likely to be affected or at least interested in particular aspects of the draft Plan or specific policies within in it.

### 6.1 Responses received

Detailed comments were received from East Devon District Council, the Environment Agency and Devon County Council Education.

### 6.2 How were issues and concerns responded to

Policies were amended to cover the points made where appropriate.

## 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 DC, 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.

### 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.

All of the statutory bodies listed in Appendix E were consulted on the draft Neighbourhood Plan for Bishops Clyst thus ensuring we adhered to the requirements of Schedule 1 of the 2012 Regulations. This list was put together with the advice of East Devon District Council.

### 7.3 How were they Consulted?

A letter was sent by email to all bodies and organisations on our consultation list (See Appendix E) with advice on how to access the Neighbourhood Plan on the website and an explanation of what was required for the consultation and the date when responses were required by. All consultation responses which received an invalid response message via email were followed up and alternative respondents were obtained. During the course of the consultation the key consultation stakeholders were contacted to enquire whether a response would be made.

### 7.4 What did the Consultees say?

A summary of the responses is included in Appendix F in the form of the schedule that was presented to and agreed by the Neighbourhood Plan Steering Group at its meeting on 17<sup>th</sup> March 2016. Details of the proposed amendments to be made to the draft Plan document in direct response to the comments are also summarised in Appendix F.



## 8. Conclusions

In preparing the Bishops Clyst Neighbourhood Plan we have made strenuous efforts 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 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.

**Key stakeholders and Statutory Consultees:**

Active Devon  
County Land and Business Assoc.  
Council for the Protection of Rural England  
Council for Racial Equality  
Devon County Council Archaeology  
Devon County Council Arts/Culture  
Devon County Council Care  
Devon County Council Countryside  
Devon County Council Education  
Devon County Council Footpaths & Rights of Way  
Devon County Council Highways  
Devon County Council Intelligence  
Devon County Council Libraries  
Devon County Council Museums (Records Office)  
Devon County Council Planning  
Devon County Council Social Services  
Devon County Council Travel to Work  
Devon County Council Waste & Recycling  
Devon County Council Youth Services  
Dept. of Communities and Local Govt.  
Dept. for Culture, Media & Sport  
Dept. of Energy & Climate Change  
Dept. for Environment, Food and Rural Affairs  
Design Council/CABE  
Devon & Somerset Fire & Rescue  
Devon Footpaths  
Devon Playing Fields Association  
Devon Ramblers Association  
Devon Wildlife Trust  
Disability Information Service  
English Heritage  
Environment Agency  
Forestry Commission  
Friends of the Earth  
Highways Agency SW  
Housebuilders' Federation  
Housing Advice Centre  
Mobile Operators Association  
Natural England SW (Exeter)  
National Farmers' Union  
Persimmon Homes  
Road Haulage Association  
RSPB Exeter & District  
Sanctuary Housing Association  
Sport England  
Stagecoach Buses  
SW Rivers Association

Dear

I am writing to inform you that Bishops Clyst 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<sup>1</sup>.

We are following a timetable which we hope will see a draft plan ready for submission to East Devon District Council in the Autumn of 2015. 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 at [www.bishopsclyst.btck.co.uk](http://www.bishopsclyst.btck.co.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 31<sup>st</sup> November 2014 as we would like to finish compiling our initial scoping of the evidence base and key issues 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 the 'door remains open' should you wish to contact us at any point.

I look forward to hearing from you in due course.

Yours sincerely,

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<sup>1</sup> See the following link for further details [http://www.eastdevon.gov.uk/planning-neighbourhood\\_plans](http://www.eastdevon.gov.uk/planning-neighbourhood_plans)

## Appendix C

### Bishops Clyst Neighbourhood Plan Launch Responses

Consultee	Acknowledged	Replied
Active Devon		
County Land and Business Assoc.		
Council for the Protection of Rural England	15/10/14	
Council for Racial Equality	15/10/14	
Devon County Council Archaeology	15/10/14	
Devon County Council Arts/Culture		
Devon County Council Care	15/10/14	
Devon County Council Countryside		
Devon County Council Education		
Devon County Council Footpaths & Rights of Way		
Devon County Council Highways		
Devon County Council Historic Environment		Appended general letter making general comments on preparation of neighbourhood plans
Devon County Council Intelligence	15/10/14	
Devon County Council Libraries	15/10/14	
Devon County Council Museums (Records Office)		Referred to other DCC contacts and information sources for use in Plan preparation
Devon County Council Planning	16/10/14	Enclosed draft document being prepared by DCC on Neighbourhood Planning for assistance
Devon County Council Social Services		
Devon County Council Travel to Work		
Devon County Council Waste & Recycling	15/10/14	
Devon County Council Youth Services		
Dept. of Communities and Local Govt.		
Dept. for Culture, Media & Sport		
Dept. of Energy & Climate Change	15/10/14	
Dept. for Environment, Food and Rural Affairs	15/10/14	
Design Council/CABE		
Devon & Somerset Fire & Rescue	15/10/14	
Devon Footpaths		
Devon Playing Fields Association		
Devon Ramblers Association		
Devon Wildlife Trust	15/10/14	Advised to contact Devon Biodiversity Records Centre for biodiversity data
Disability Information Service	15/10/14	
English Heritage		Enclosed previous comments to EDDC setting out general position of EH on Neighbourhood Planning
Environment Agency		
Forestry Commission	16/10/14	
Friends of the Earth		
Highways Agency SW		Drew attention to proximity of J30 on M5 and asked to be consulted as Plan progressed
Housebuilders' Federation		
Housing Advice Centre		
Mobile Operators Association		
Natural England SW (Exeter)		Gave general advice on things to be considered in preparation of Plan
National Farmers' Union	15/10/14	
Persimmon Homes		
Ramblers Association		Drew attention to ROW within parish and suggested we consider if paths could be extended or linked
Road Haulage Association		
RSPB Exeter & District		
Sanctuary Housing Association		
Sport England		Set out national policies which should be reflected in Plan
Stagecoach Buses		
SW Rivers Association		

## Appendix D

### Bishops Clyst Neighbourhood Plan Reg. 14 Consultee List

Active Devon	DCC Planning	Marine Management Org.
AMEC E&I UK	DCC Social Services	MIND (Devon)
British Telecom	DCC Care	MoD
Broadband Devon	DCC Waste & Recycling	Mobile Operators Association
Broadclyst PC	DCC Youth Services	Vodafone & O2
CAA Airspace	Devon Faith & Beliefs Forum	EE
CAA Safety	Devon Federation of WIs	Three
Canal & River Trust	Devon Health & Wellbeing Board	National Grid
Clyst Honiton PC	Devon Partnership NHS Trust	NFU
Clyst St George PC	Devon Ramblers (Footpaths)	National Housing Federation
Community Council of Devon	Devon Playing Fields Association	National Trust
CPRE	Devon Wildlife Trust	Natural England
Equality & Human Rights Comm.	Disability Information Service	Natural England
County Land and Business Association	EDDC Conservation	Natural England Devon
Crown Estates Commissioners	EDDC Green Infrastructure	Network Rail
DCLG	EDDC Neighbourhood Plan	NHS East Devon
DCMS	EDDC Planning	Persimmon Homes
DECC	Environment Agency	Plymouth Bretheren
DEFRA	Environment Agency	Prince's Trust SW
Design Council/CABE	Exe Estuary Authority	Road Haulage Association
Devon Alzheimers	Exe Estuary Management Part'p	Royal Devon & Exeter NHS Trust
Devon Carers	Exeter & Devon Airports Ltd	RSPB Exeter & District
Devon & Cornwall Police (crime)	Exeter City Council	Sanctuary Housing Association
D&C Police Architecture liaison	ECC Housing Advice Centre	SW Ambulance Service
Devon & Cornwall Housing Assoc	Farringdon PC	SW Rivers Association
Devon & Somerset Fire & Rescue	First Great Western	Southwest Trains
Devon & Somerset Fire & Rescue	Forestry Commission	South West Water
DCC Archaeology	Forestry Commission	Sovereign Housing Association
DCC Arts/Culture	Friends of the Earth	Sport England SW
DCC Environment & Transport	Fulfords	Stagecoach Buses
DCC Education	The Gardens Trust	Theatres Trust
DCC Footpaths & Rights of Way	Health & Safety Executive	The Coal Authority
DCC Highways	Heart of SW LEP	The Planning Inspectorate
DCC Local Nature Partnership	Highways England	Wales & West Utilities Ltd
DCC Travel to work	Historic England SW	Western Power Distribution SW
DCC Intelligence	Home & Communities Agency	Woodbury PC
DCC Libraries	Housebuilders' Federation	Woodland Trust
DCC Museums (Records Office)	Living Options Devon	

Pre-submission NP Comments	Response/Proposed Action
<p><b>Sport England Planning South</b> General reference to requirements to reflect national sport policies and LA playing pitch strategies</p>	Advice already taken into account
<p><b>Sovereign Housing</b> Request for details of location of Parish – no further comment received</p>	No action needed
<p><b>Highways England</b> Welcome policies for improved pedestrian &amp; cycle links.</p>	No action needed
<p><b>South West Water</b> No issues</p>	No action needed
<p><b>Health &amp; Safety Executive</b> No representations to make.</p>	No action needed
<p><b>Historic Environment Team DCC</b> <i>The plan appears to make no reference to archaeology or to the historic environment, although this will be a material consideration in deciding many of the planning applications submitted in your area. To this end I suggest that the 'chapter' on Built Environment would be better titled Historic Environment. This would allow for all aspects of that environment, both built and buried to be incorporated within this section.</i> <i>Although there are descriptions of the villages in the general introduction, there is no historical summary which would perhaps help set this section in context.</i> <i>I attach a generic letter from Bill Horner, County Archaeologist on Neighbourhood Plan preparation and the Historic Environment. As he says the production of a neighbourhood plan is an ideal opportunity for you to determine what aspects of the local historic environments are important to your community and how they can be best managed.</i> <i>Below are comments on the archaeological potential and the historic landscape characterisation of the area together with a brief historic environment overview which I hope you will find useful.</i> <b>Archaeological Potential</b> <i>Archaeological evidence indicating prehistoric activity is recorded in the wider landscape. Documentary and place name evidence indicate that Sowton, Bishop's Clyst and Clyst St. Mary have medieval or earlier origins. Buried evidence for former buildings or structures may well be present within the historic cores of these settlements and these may be affected by any development in these area. There is also the potential for the survival of earlier historic building fabric within apparently later structures. The settings of nationally important designated heritage assets located within the neighbourhood plan area may also be adversely affected upon by any development. This should be considered at an early stage in the design and layout of any new development. Similar consideration should also be given to non-designated heritage assets of local importance.</i></p>	Submission will be added to Local Evidence folder. This will be considered by BCPC when nominating local heritage assets. Archaeology is not specifically covered by the Neighbourhood Plan but the matters raised are covered by EDDC Local Plan EN6.

### *Historic Landscape Characterisation*

*Historic landscape characterisation shows the settlements of Clyst St. Mary, Bishop's Clyst and Sowton to be surrounded by fields that were variously laid out in the medieval, post-medieval and modern periods, the latter created by adapting earlier fields. Earlier fields tend towards curving boundaries while those laid out in the 18<sup>th</sup> and 19<sup>th</sup> centuries generally have straight boundaries. To the south of Clyst St. Mary, the modern development at Winslade Park was laid out in an area of modern enclosures. The adjacent park is categorised as a recreation area. The land around Bishop's Court is designated as park/garden and adjacent to this is the large public complex of Westpoint.*

### *Historic Environment Overview*

*The following is a very brief overview of some of the important sites, features and buildings within the neighbourhood plan area. It is based on information currently held in Devon County Council's Historic Environment Record (HER).*

*Neolithic and Bronze Age flints have been found in the area and a number of possible prehistoric or Roman enclosures and field boundaries have been identified through geophysical survey or are visible as crop marks. Both the A30 and the A3052 to the east of Clyst St. Mary are thought follow the lines of Roman road although its route west across the Clyst is not clear.*

*The old bridge is a key feature which played an important part in the prayer book rebellion of 1549. It is first documented in 1238 and the two low arches at its western end may date from that time. It is a Scheduled Ancient Monument.*

*The leat and tailrace to/from the former Clyst Mill are also important features. Although the present mill building is thought to be 18<sup>th</sup> or 19<sup>th</sup> century in date, there are documentary references to a watermill here in the late 14<sup>th</sup> and 15<sup>th</sup> centuries. This may have stood just downstream. The leat and its associated tailrace likely, therefore, to be also medieval in origin.*

*Bishop's Court was originally the site of a palace of the medieval Bishops of Exeter. Although the building was remodelled in the 19<sup>th</sup> century, medieval fabric survives. To the south-east is a former tithe barn probably dating from the 14<sup>th</sup> century; the adjoining stable clock is early 16<sup>th</sup> century.*

*Branching off the A3052 to the east of Clyst St. Mary is a medieval hollow way leading to Oilmill Cross which once formed part of the boundary of the medieval estate of Clystwicon. The parish boundary runs along it.*

*It is notable that a number of the listed buildings in Sowton date from the 17<sup>th</sup> century, while the village hall is thought to have originated as an 18<sup>th</sup> century barn. In Clyst St. Mary, Craigs Cottages date to the 16<sup>th</sup> century. Brockwell (not listed) is suggested to date to the late 16<sup>th</sup> century. Newhouse is thought to have a 17<sup>th</sup> century core. Within the wider landscape, Dymonds Farmhouse for example was built in 1676 and Old Kiddicott is a 17<sup>th</sup> century remodelling of an earlier house. Opposite, to*

<p>north of the present Shepherds Farm is the site of the former farmstead which reputed to be that of a medieval manor house.</p> <p>There are also more modern features of interest within the neighbourhood plan area. The weirs and leat to the former Sowton Mill survive, which are probably at least 18<sup>th</sup> century in origin. 38 and 39 Sidmouth Road are the former Sandy Gate toll house built in the 18<sup>th</sup> century. Both parish churches were considerably altered in the 19<sup>th</sup> century. Along the 3052, Linden Lee is a small traditional early 19<sup>th</sup> century cottage. White Lodge and Red Lodge are former lodges to Winslade Park. White Lodge is the earlier and more elaborate, built in 1812. Sowton Lodge, Court Lodge and East Lodge were built in 1834 as lodges for Bishop's Court.</p> <p>Within Westpoint is Home Farm, a planned farmstead built in 1846. Between Westpoint and the Cat and Fiddle Estate is the site of a former 18<sup>th</sup>-19<sup>th</sup> century brickworks. Of much more recent date, are the two nissen huts in the grounds of Oakview House which were part of a German prisoner of war camp at Dymonds Farm. There was also a military camp in the grounds of Bishops Court. In Sowton, the War memorial stands as an important reminder of all who gave their lives in the first and second world wars.</p>	
<p><b>National Grid</b> No record of apparatus in NP area</p>	No action needed
<p><b>Network Rail</b> No objection in principle</p>	No action needed
<p><b>Tim Spurway EDDC (1)</b> Further to discussion with colleagues, we feel that there is value adding the BUAB to your plan.</p> <p>Adding a boundary, even if you just want to copy the existing boundary with the permissions included will give it weight as part of the development plan, whereas we currently don't have an adopted boundary until we get the Villages Plan in place next year. Until then, we could potentially have developers challenging that position, so having an adopted boundary in place would extinguish that threat. If you choose this route, in order to meet the regulations, you will have to conduct some kind of additional 6-week pre-submission consultation, which I appreciate will be frustrating considering you are almost done with your consultation. I would advise consulting on only the section you are amending rather than the whole plan, as you will have already received comments for the majority of the plan, and consulting again on the whole plan would cause some confusion.</p>	Extend Policy BE3 to identify BUAB and add map See revised policy in amendment schedule
<p><b>Devon Countryside Access Forum</b> 1) Page 40 includes the following paragraph: "Unofficial paths from the old bridge along the mill leat and along the bank of the River Clyst are used by the public. Attempts by the Parish Council to negotiate with the landowner to have these routes scheduled as public footpaths have not been successful. Efforts by the Parish Council over several years to gain the permission of landowners to extend the current public footpaths have also been unsuccessful."</p>	<p>1) Wording in NP will be amended as set out. 2) The NP does not refer specifically to this point, which is covered in the Local Plan by policy TC4. The NP could be amended to add references as set out but this was not raised as an issue in local consultations. 3) An additional para will be added to policies as set out.</p>



<p><i>The first sentence of that paragraph is unclear and could give rise to confusion. The DCAF understands that these paths are currently being investigated through the Definitive Map review process. It would be helpful to rephrase that paragraph along the lines of:  “Unofficial paths from the old bridge along the mill leat and along the bank of the River Clyst are used by the public. The legal status of these routes as public footpaths is currently being assessed through Devon County Council’s Definitive Map review process. Efforts by the Parish Council over several years to gain the permission of landowners to extend the existing network of public footpaths have been unsuccessful.”</i></p> <p><i>2) Page 41, 5, 1st bullet point mentions that 54% of people selected “improved rights of way and footpaths etc. to give access for all.” The DCAF has a policy of encouraging multi-use where possible (access for all users including horse riders and those with disabilities). The DCAF notes that there are no bridleways/multi-use routes in the parish and would be interested to know whether improved access for all was considered during deliberations on the Plan.</i></p> <p><i>3) Policies CF1 and CF2 are set out on page 41. It would be helpful if these aspirational statements included reference to consultation with landowners.</i></p>	
<p><b>Tim Spurway (2)</b> - 15-page letter</p> <ol style="list-style-type: none"> <li>1. More photos and paragraph numbers</li> <li>2. Rename references to avoid confusion with Local Plan</li> <li>3. Remove references to draft Local Plan</li> <li>4. Include more community consultation feedback in policy justification</li> <li>5. Amend map copyright to 2016</li> <li>6. Inconsistent formatting of policy points</li> <li>7. Noise and air quality to be included</li> <li>8. Forward – ref to Local Plan to be amended as now adopted</li> <li>9. Introduction</li> </ol> <p><i>Page 5, para 3- indicates that East Devon District Council consciously relaxed its policy of generally restricting growth to within the built-up area boundary. This is not strictly the case- it was that we were no longer able to defend our built-up area boundary policy as we could not demonstrate a 5 year supply of land for housing in the district. This paragraph should be amended to reflect this.</i></p> <p><i>Page 5, para 8- spelling error, ‘associate’ should be ‘associated’</i></p> <p><i>Page 5, para 7/8- Reference Football training ground at Cat &amp; Fiddle.</i></p> <p><i>Page 6, para 1- Consider mentioning the playing fields and open space to the east of Exmouth Road as a development constraint as well as being under pressure.</i></p> <p>10. Preparing the Plan</p> <p><i>Para 4- contains text left over from the previous version of the plan, stating that the pre-submission version is still to come. This will have to be amended in the next version.</i></p> <p>11. Sustainable Development</p> <p><i>Merge with section on sustainability appraisal.</i></p>	<ol style="list-style-type: none"> <li>1) Agreed, extra and better quality photographs to be taken</li> <li>2) Agreed</li> <li>3) Agreed</li> <li>4) Tim to be asked to clarify where this is needed – we don’t want to make the document too wordy.</li> <li>5) Agreed</li> <li>6) Agreed</li> <li>7) Further contact with TS he suggests already covered by Local Plan so ignore. It was included in the SA and is covered by EDDC Local Plan policy EN 14</li> <li>8) Agreed</li> <li>9) Rewording of para 3 p5 agreed, also add reference to definition of BUAB as set out above; spelling para 8 agreed; C&amp;F description is Park, ECFC training ground referred to elsewhere; rewording of para 1 p6 agreed</li> <li>10) Agreed</li> <li>11) We do not think that merging this section with sustainability appraisal will improve clarity, agree other points</li> </ol>

<p><i>Second sentence- missing a comma after the word 'enable'.</i></p> <p><i>Amend reference to NPPG being policy, it is guidance to support the NPPF.</i></p> <p>12. <i>Structure of Plan Para 6 can be removed as Local Plan adopted</i></p> <p>13. <i>Themes etc. Para 3 first sentence should read "Not all our objectives lead directly to...", Para 4 second sentence "policies" not "polices"</i></p> <p>14. <i>NE Introduction – Para 2 provide further clarification on the claim related to flood risk at Sowton Barton as referenced above</i></p> <p>15. <i>EN2 Point 5 – Clyst St Mary Wood misspelled</i></p> <p>16. <i>EN5 - Consider rewording policy to incorporate maintaining or enhancing the ecological status of local watercourses</i></p> <p>17. <i>BE Introduction</i>  <i>Para 2- Amend second sentence to read '...and its electorate and ensure that the policies of the Neighbourhood Plan are fully taken into account...'. The aims and objectives hold no weight in decision making and therefore can't be considered.</i>  <i>Para 4- Remove the word 'draft' when referring to the Local Plan</i></p> <p>18. <i>BE Protect Para 1 – add number of Grade II* listed buildings</i></p> <p>19. <i>BE1 – remove or replace term "heritage asset" in second sentence</i></p> <p>20. <i>BE2 – remove requirement for a design &amp; access statement</i></p> <p>21. <i>BE3 – remove reference to GDO, final sentence should read "...setting in which the development is taking place."</i></p> <p>22. <i>Housing</i>  <i>Para 1- Amend reference to application at Bridge House to '...permission for 5 dwellings.' In the fourth sentence.</i>  <i>Para 2- Remove reference to Cat Copse in second sentence.</i>  <i>Para 4- Amend first sentence to read '...the Neighbourhood Plan will seek to ensure:'</i></p> <p>23. <i>Meet local needs</i>  <i>Para 1- Amend incorrect references to District affordable housing policy.</i>  <i>Para 1- Remove reference to developers being able to negotiate out of affordable housing contributions.</i></p> <p>24. <i>HO1 – Footnote 17 on p27 is blank</i></p> <p>25. <i>HO2 - Provide further justification in the supporting text on decision to include 9 dwelling threshold. Either amend 25% requirement to reflect evidenced need of 40% or provide justification for the reduced proportion. Consider adding additional statement to avoid the artificial subdivision of sites.</i></p> <p>26. <i>HO3 - Consider removal of car parking space standards or revise them to be focused on affected areas where on-street car parking causes congestion issues.</i></p>	<p>12) Agree</p> <p>13) Agree</p> <p>14) Mike Fernbank advises no further problems so section on Sowton Barton deleted.</p> <p>15) Agreed</p> <p>16) Agreed, see revised Policy EN5 in amendment schedule reword Policy</p> <p>17) Agreed</p> <p>18) Agreed, Bob to provide numbers</p> <p>19) Agreed, see revised Policy BE1 in amendment schedule</p> <p>20) Agreed, see revised Policy BE2 in amendment schedule</p> <p>21) Agreed, see revised Policy BE3 in amendment schedule</p> <p>22) Agreed, to be amended</p> <p>23) Agreed, to be amended</p> <p>24) Agreed, footnote to be added</p> <p>25) Para 4 of justification reworded to refer to previous Housing Needs Survey and fact we have chosen 25% in the absence of any evidence for a larger percentage. Reference to 9 dwelling cut-off point deleted.</p> <p>26) Additional evidence added from car park survey and report. Garage size internal, see revised Policy HO3 in amendment schedule.</p>
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<p><i>Provide further justification on affected areas where on-street parking causes congestion issues. Stipulate that the minimum garage sizes are either internal or external measurements.</i></p> <p>27. HO4 – consider revisiting the policy to ensure that it is what the group intended</p> <p>28. CS1 – clarify whether this policy includes recreation facilities, consider producing a list of “locally valued community assets”</p> <p>29. CS2 - Consider replacing the term ‘high speed telecommunication networks’ with ‘high speed broadband’, Include the words ‘where practicable,’ at the beginning of the policy.</p> <p>30. Help facilities etc – First para second sentence should read “Neither are directly accessible”</p> <p>31. CS3 – Consider amending policy to read “.... accordance with the Design Statement, would not cause an unacceptable loss to outdoor recreational space and they include..”</p> <p>32. CS4 - consider mentioning the proposals should have regard to the Design Statement</p> <p>33. BU1 – Add additional sentence along the lines of “...and has been marketed for a period of at least 12 months without success”</p> <p>34. BU3 – Change “and identified on Map 5” to “as identified ..” just to be clear that it doesn’t mean the whole of Westpoint, just those parts shown on the map.</p> <p>35. BU4 – consider an additional statement tying new development to the existing use of the Westpoint Showground.</p> <p>36. TR1 – Amend first sentence to read “as part of a transport assessment <u>they</u> will”</p> <p>37. TR2 Add additional statement so policy reads “additional off-road parking spaces <u>in the village</u> will be supported” and consider removing the term “where practical” at the end of the policy</p> <p>38. TR3 - consider removing the term “where practical” at the end of the policy</p> <p>39. TR4 – Consider moving policy to following section on Cycleways and Footpaths</p> <p>40. Cycleways etc Paras 3 &amp; 4 – Clarify what is meant by lack of public footpaths in areas stated</p> <p>41. CF2 – Provide further clarification on how the contributions will be secured</p> <p>42. Sports &amp; Rec - Para 4- Make amendment to refer to playing pitch strategy. Para 5- Consider referencing aspirations of Exeter City FC expansion plans Para 7- Add additional reference to pitches being used in the recent past and that demand still exists. Consider inclusion of a list of priority projects that CIL can be used to help fund.</p> <p>43. Safeguard &amp; enhance etc - Para 5- Amend first sentence to read ‘the pitches at Winslade Park (Friends Life) should be retained... In addition...’ and add a footnote reference.</p>	<p>27) Agreed, see revised Policy HO4 in amendment schedule</p> <p>28) Provide list in new para 4 taken from previous paras to make clear what is being included.</p> <p>29) We do not consider that this improves description but add “broadband” see revised Policy CS2 in amendment schedule</p> <p>30) Agreed</p> <p>31) Agreed, see revised Policy CS3 in amendment schedule</p> <p>32) Agreed, see revised Policy CS4 in amendment schedule</p> <p>33) Not agreed</p> <p>34) Agreed, see revised Policy BU3 in amendment schedule</p> <p>35) Agreed, see revised Policy BU4 in amendment schedule</p> <p>36) Agreed, see revised Policy TR1 in amendment schedule</p> <p>37) Agreed, see revised Policy TR2 in amendment schedule</p> <p>38) Agreed, see revised Policy TR3 in amendment schedule</p> <p>39) Not agreed</p> <p>40) Para 4 p40 and para 6 P41 to be moved to p39 justification for TR4 (also add reference to C&amp;F footpath see above)</p> <p>41) Point added about CIL payments</p> <p>42) Paras reworded with reference to continued use by HYFC and CWCC in para 7 (see also ECFC comments above) Rob to raise possible list of priority CIL projects with BCPC.</p> <p>43) Agreed</p> <p>44) Agreed, see revised Policy SR2 in amendment schedule</p> <p>45) Agreed, wording added.</p> <p>46) Agreed</p>
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<p>44. SR2 – Consider replacing “community need” with “demand” and add the word “quality” into criteria point b.</p> <p>45. Expand Opportunities – Para 3 – mention that the open space study was reviewed in 2014 and consider inclusion of direct data from Open Space Study to be more specific</p> <p>46. Glossary – Include Playing Pitch Strategy in list of terms</p>	
<p><b>Historic England</b> No specific comments</p>	No action needed
<p><b>Clyst St George Parish Council</b> <i>Share views on improving footpaths &amp; cycleways, in particular cycleway linking CSM with CSG and Exe Trail</i></p>	No action needed
<p><b>Natural England</b></p> <p>1. Area in reasonably close proximity to Ramsar and SPA sites. Suggest adding to Policy EN1 “the provision of appropriate measures to mitigate any adverse effects on development of designated European wildlife sites” and reference in Plan text to proposed Clyst Valley Regional Park.</p> <p>2. Include “geodiversity” in title of Policy EN1</p> <p>3. Policy BE3 refers to BUAB but no boundary delineated.</p> <p>4. In Policy BU3 it is not clear whether the entirety of site 2 relates to existing site or if it is seeking to identify additional land for development. Also confirmation that other business parks are existing.</p> <p>5. Clarify if Policy BU3 relates to sites identified as site 4 or separate areas.</p> <p>6. Magic website shows priority habitat close to S boundary of site 4 but not shown on Map 3.</p> <p>7. Consider how Plan can implement elements of a wider green infrastructure</p> <p>8. SSEA states that Plan does not allocate specific sites for development but it appears BU3 Map 5 and Policy SR1 both allocate new sites. Also SEA states development in BUAB and none identified</p> <p>9. New East Devon Local Plan adopted Jan 2016. Position should be reflected in HRA.</p>	<p>1. Note added</p> <p>2. Included</p> <p>3. BUAB map now included with text</p> <p>4. Sites identified are all existing, no extensions proposed.</p> <p>5. Policy clarified.</p> <p>6. Discussion with DBRC following Phase 1 of Habitat Survey indicates that the area identified has no significant habitat interest</p> <p>7. This will follow from the Habitat Survey being carried out under the Parish Council Action List which was identified by the NP process</p> <p>8. Discussion with Tim Spurway EDDC confirms that no areas are being allocated for development so no action required</p> <p>9. Plan amended to reflect adoption of EDDC Local Plan</p>