

Responses to Consultation (2)

This is a summary of responses. Full details are available. Numbers in the right hand column indicate items in the Report to the Working Party.

NP = Neighbourhood Plan, EET = Exmouth Estuary Trail 'the cycle path', PC = Parish Council, GF = Goodmores Farm, BuAB = Built up Area Boundary

Respondent	Policy number	Summary of issues raised	Working Party response
Avocet Line Rail Users Group (Tony Day)	CAP11 Agree	Will work with PC to achieve. Do not want EET diverted along the railway line since this land could be key for future enhanced rail service.	We recognise the desire to "reserve" this land but would wish to retain the objective of re-routing. Re-drafted
EDDC		<p>Thank you for giving us the opportunity to respond to your public consultation. I have circulated the Plan internally to officers in our Development Management, Streetscene (including car parking), Landscape and Housing sections for comment.</p> <p>I would stress at the outset that this letter provides informal officer comments only that relate to matters that you may feel warrant attention or consideration. We have not had opportunity to seek member opinion or views on your consultation plan and these views are expressed without prejudice to any officer or Council opinion (including potential formal or informal objections) that may be made at a later date. We are seeking to be helpful and constructive in views expressed but it is important to recognise that it is your plan and the clear onus will be on you justifying plan content and satisfying yourselves that through your work you have followed correct procedures as applicable to your role in Neighbourhood Plan production.</p>	Noted
	Summary	<p>In summary the comments I received are as follows: The Plan is comprehensive and looks professional. It is written in a different style to EDDC and other planning documents but that reflects the fact that it is produced and 'owned' by the community. The introductory sections (up to page 11) are somewhat wordy though, and are not always written in 'plain English'. The point was</p>	Actioned

		also made that, with the exception of an allocations Policy should you decide to include one, the Planning objectives cover issues already addressed by Local Plan policies and you may wish to consider whether they are locally distinctive/different or duplicate them.	
	<u>Introduction</u>	Para 1.8 could say something like .."East Devon District Council would make these decisions with much less local input" rather than "without local input" as we will always consult the Parish Council and residents.	Actioned
	<u>The content and methodology</u>	Para 2.4 could say ..."parishes were asked to identify preferred sites where new building..." rather than "asked to determine where" Map 3 should be attributed to Source EDDC (Proposed submission draft Local Plan November 2012)	Actioned
	<u>Our vision</u>	The perfect plait analogy refers to 'structure' rather than the conventional 'economy' which is usually used to define a sustainable community. Does this mean infrastructure? Do you need to include this or could you just have the vision bullet points for more impact?	Retained – but point taken
	<u>Housing</u>	This section caused some confusion. It is not clear whether 'The Preferred List' of sites are included for information or are intended to be allocations. I appreciate that EDDC has not finished the Villages exercise but the Neighbourhood Plan, we would suggest, needs to either make it clear that these are the preferred sites for information only (and actual sites will be allocated in the EDDC Villages Plan) or needs to allocate the sites and identify them clearly on a map. I would suggest that the latter course is more	Actioned

		<p>appropriate as it will give greater clarity to residents/landowners. The EDDC Villages Plan can then show the allocated sites and Built-up Area Boundary as per the (adopted) Neighbourhood Plan.</p> <p>If you don't allocate specific sites or numbers but identify a list of preferred or back up sites, development may come forward that is not necessarily at a preferred scale or in a preferred/ proposed location. You will no doubt take a view on this issue and could consider replacing the preferred list with a proposed allocation list that is deliverable and is in conformity with emerging strategic policy. You will appreciate that this is simply a suggestion though and it is your plan so you must decide whether this is appropriate and, if it is, which sites to include. The following is a possible approach:</p> <p>All the text under "The preferred list" could be removed (or added to Appendix H as background) and the "Where we are" section be brought forward in the text (so that the maps 4,5 and 6 are placed after it). 'Where we are' could then contain an introductory paragraph and a Policy along the lines of:</p> <p>"Following extensive consultation with the community, and using the methodology set out by East Devon District Council for assessing potential housing sites in villages, the Parish Council identified 5 preferred locations for development. The sites perform well against the sustainability criteria (see Appendix H for the methodology and criteria) and, with the exception of Lympstone Nursery, all are within the existing Built-up Area Boundary. Of these five sites, two are unlikely to meet the minimum threshold of 5 dwellings (both have access constraints, one has a number of protected trees which reduce potential capacity and the other has planning permission for a single dwelling) so it is not appropriate to allocate them, but it</p>	
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is proposed to allocate the remaining three sites for 25 dwellings. It should be noted that the nurseries site is extremely sensitive due to its position within the Conservation Area and proximity to nearby listed buildings, therefore any development will be subject to a development brief and removal of existing visually intrusive structures.

Objective H x – Housing Allocations: - Future development up to 2026 will be allocated on the following sites:

Jackson Meadow (smaller) – 6 dwellings
Jackson Meadow (larger) – 13 dwellings
Lympstone Nursery – 6 dwellings (a development brief will be prepared for the site)

Glebelands will be identified as a site with planning permission (for 15 houses)

Since the process started, planning permission has been granted for 15 houses at Glebelands which means that the Local Plan’s requirement for 40 can be satisfactorily met. There may be an opportunity to develop the Nursery site for up to 12 dwellings but this will be subject to a future development brief and future consultation.

Windfall developments within the Built up Area Boundary, usually of 1 or 2 dwellings, will continue to come forward within the Plan period in addition to these allocations.

A further 100-150 dwellings of the 350 proposed at Goodmore’s Farm in the Local Plan will be in Lympstone Parish.”

Obviously, I have used these sites and numbers as an example so

		<p>you may wish to change this, however the constraints on the other sites are such that your options may be limited.</p> <p>A Policy allocating sites and a clear map identifying them may be all that is needed here. All the information relating to the other sites available and the process used to select the allocations, including the table of sites, perhaps confuses the issue and could be included in the background information. The table refers to past permissions (not counted towards the 40), recently granted permissions (of which some count towards the 40 and some don't) and it isn't very clear what the final two columns are showing. We have also found, from producing Plans in the past, that the information in the table is likely to become dated very quickly, so that it becomes irrelevant long before the Plan reaches its end date. I suggest that this table be added to the information about how you reached your preferred sites in the Appendix.</p> <p>The maps would be clearer if they are larger and have a key. Is the dotted line on Map 5 the Parish boundary? The content of the maps is good and illustrates your points well.</p>	
	<u>Location</u>	<p>First para. Could Add "and identities" after "separate characters". Objective H1- delete (at Goodmore's Farm) as it implies that development outside the Exmouth boundary will be acceptable elsewhere.</p>	Actioned
	<u>Need</u>	<p>Objective H2 could refer to 'housing sizes, types and tenures' rather than prices. There is already a similar local plan policy.</p>	Actioned
	<u>Density and Scale</u>	<p>Objective H3- If you decide to allocate 13 houses at Jacksons Meadow then the preference for sites of 10 or less is undermined. You could change this (to 15?) or just refer to small-scale development. Again, this is similar to an existing local plan policy.</p>	Actioned

	<u>Design</u>	Objective H4- received mixed responses as design is quite prescriptive and subjective but is locally relevant and incorporates some of your design guide. It was suggested that there should be greater flexibility, particularly for contemporary dwellings, unless they would compromise the historic character of the village.	Amended
	<u>Employment</u>	Clarify the reference to Q2 in the last paragraph before CAP3.	Actioned
	<u>Traffic</u>	It was suggested that, as you identify a potential need for car parking and small employment units you could consider including an allocations policy and identifying sites for these uses. Cap 8 reads positively in respect of cyclists but the preceding text seems quite negative and suggests that they are a problem in many ways. Is there scope to encourage cyclists into the village so that they do use shops and services, or improve access around the village so that more residents are encouraged to cycle locally and reduce car usage? Could dedicated car parking be provided on the edge of the village or facilities in the car park be improved so cyclists are encouraged into the village shops (cycle parking/lockers/a shower at the toilets) perhaps.	Actioned This has been extensively re-worked
	<u>Dinan Way Extension</u>	Cap 10 refers to (see Cap 10)- should this be Cap 11?	Yes - actioned
	<u>Climate Change</u>	Should Cap 20 also refer to cycle parking provision as a means to reduce car usage?	Done
Devon County Council	CAP6	Remove reference to vehicle speeds (no empirical evidence to suggest this is an issue) and change wording to 'promote and support traffic management measures to increase public safety'.	Actioned
	CAP10	Remove suggested alignment of Dinan Way extension which will be determined subject to engineering/cost considerations and	Disagree. Whilst understanding that the Plan cannot pre-empt decisions on the route, it does allow an opportunity for

		<p>public consultation.</p> <p>No reason or evidence for 'no parking' stipulation which should be removed. Parking restrictions are determined by Traffic Regulation Orders following consultation.</p>	<p>the community to express its views and state the policy of the Parish Council - these should be taken into account by the relevant authorities.</p> <p>Since the purpose of this route is to <i>"Avoid traffic currently using inappropriate residential streets and narrow lanes when travelling between the A376 and areas towards the east of Exmouth. Improve the scope for better bus operation"</i> parking would only be a hindrance</p>
	CAP18	<p>Whilst understanding and broadly supporting the ambition that all Lympstone children attend Lympstone pre-school and primary school various constraints mean that it is not a practical policy. Furthermore approx. 30 houses within the Parish are within the Brixington Primary School designated area.</p> <p>Suggested re-wording: 'all children within the Lympstone Primary School designated area should be able to attend the school where there is sufficient capacity and where additional capacity can reasonably be provided subject to funding, planning and environmental issues'</p> <p>DCC happy to engage in further discussion about Dinan Way and the school with local residents and the PC.</p>	<p>Amended</p> <p>1st Meeting to be arranged</p>
Devon & Somerset Fire & Rescue Service		<p>Particular concern is that fire access and egress is maintained.</p> <p>Also mention importance of maintaining road width and access.</p>	<p>Would be actioned within the planning process</p> <p>Agreed</p>
Diocese of Exeter		<p>Agree to inclusion of 'The Old Rectory' in the preferred list of sites</p>	<p>This site has not been allocated following comments from EDDC but remains a site that can be developed as it is within the BuAB</p>
East Devon Group Campaign to		<p>Excellent plan. Would benefit from clearer maps. GF development should be discussed further with Exmouth Town Council and EDDC</p>	<p>The small maps shown were for guidance only full A4 maps were contained within the appendices. Map content will be reviewed.</p>

Protect Rural England			Goodmore's Farm development will be on the agenda with EDDC and Exmouth Town Council
it	H/P1 H/P2	Fully endorse – the most important part of the Plan. Would like the Green Wedge extended eastwards towards Woodbury Common to prevent northwards expansion of Exmouth	Amended to become a DMP and therefore stronger. Agree with Green Wedge but this is within EDDC Local Plan
East Devon District Council	Para 1.8	<u>Introduction</u>	Accepted – amended
	2.4	<u>The content and methodology</u> Map 3	Accepted – amended
		<u>Our vision for Lympstone</u>	To be reviewed
		<u>Section 2- Introduction to policies</u> Para 5.6 we would question if this is really needed.	Amended – but we feel we need this to be included
		<u>Housing</u>	Accepted in full and NP amended – maps to be included as A4 where necessary.
		<u>Location</u>	Accepted – amended
		Need	Accepted – amended
		<u>Density and Scale</u>	Accepted – replaced by “small/smaller scale developments of fewer than 15 dwellings will be preferred”
		Design	The Objective has been changed and the policies amended
		<u>Employment</u>	Q2 deleted as we do not know when this will be completed
		It was suggested that, as you identify a potential need for car parking and small employment units you could consider including an allocations policy and identifying sites for these uses.	A site for a car park at the eastern end of the village has now been identified but no site has been put forward for employment units and would be happy to discuss further as opportunities arise
		Traffic	CAP 8 Amended
		<u>Dinan Way Extension</u> Cap 10 refers to (see Cap 10)- should this be Cap 11?	Yes - corrected

		<p><u>Climate Change</u> Should Cap 20 also refer to cycle parking provision as a means to reduce car usage?</p>	Done
Exmouth & District Community Transport Group		Information about this local charity that provides transport to help people unable to use conventional public transport to maintain their independence	Noted
Ian Jewson Planning Ltd.		Disagree with Map 6. Site selection process (App. A and H) was flawed e.g. two sites not included in SHLAA, and two in Conservation Area so may be constrained	The selection of the allocated sites was completed in November/December 2012 within the Village Boundary Line Exercise where all development locations submitted were put through the same evaluation process. All locations outside of the BuAB were taken from locations submitted to the SHLAA process that has been on-going since as long ago as 2010. If they were not submitted to the SHLAA process they were not considered. The sites within the BuAB did not need to be submitted to the SHLAA process, since they have deemed development, so that list was put together by local knowledge and the owners contacted regarding their wishes.
		Disagree with table on p13 as it is inconsistent with the emerging Local Plan policy (Strategy 27). Table needs to be amended to exclude a number of sites.	Deleted – correct but deemed confusing
		Serious concerns about the Plans ability to deliver the 40 dwellings required. Recommend 'Land off Underhill Close' should be included as a Preferred Site. Whilst it is outside the BuAB it is in a sustainable location, and was found suitable during EDDC SHLAA process	'Land off Underhill Close' did not fare well against other sites put forward, not least because it is Green Wedge, CPA and a skyline development. EDDC are confident that our 40 can be achieved with the existing list and additionally there is the Old Rectory within the BuAB where the diocese have confirmed their intention to develop.
		The NP acknowledges a need for quality housing for the over 55's	This is being addressed – but the requirement is for 1 or 2

		(which their client Blue Cedar Homes provides) but this is not provided for in the allocations	bedroom bungalows to allow existing residents to downsize but remain in the community
LYMPSTONE FISHERY & HARBOUR ASSOCIATION (Colonel GF Wheeler)		<p>A balanced and well-reasoned plan for controlled development. Concern that the plan has no clear solution to the parking problems it acknowledges.</p> <p>Number of cyclists causes a problem with the movement of boats to and from the slipway</p> <p>Concerned about increasing pressure on the harbour – there is a waiting list for most facilities</p> <p>Concerned about dog fouling and the Association would welcome action e.g. dog waste bin/dog warden.</p> <p>Concerned about unauthorised parking on the ramp at the Sowden End road bend and may need assistance of PC to install a lockable vehicle (NOT pedestrian) barrier</p> <p>Determined to maintain public access to the harbour and to have help in from Parish in advising children not to cycle, skateboard or throw stones from the harbour.</p>	<p>Thanks</p> <p>We have now included one parcel of land that has been flushed out during the process – but accept the problem still exists within the village centre</p> <p>CAP 8 Amended</p> <p>A victim of your own success!</p> <p>Covered under Environment – also a continuing item on the PC agenda.</p> <p>Accepted – maybe useful for LF&HB and LPC to have a short meeting to action these issues.</p> <p>Most welcome</p>
LYMPSTONE HISTORIC HOUSES ASSOC. (Clive Wilson)	H1/P2 H4/P7 CAP1 Generally agree	Suggested changes of wording to strengthen protection and link with VDS. Concerned that VDS cannot be updated without consultation	There is a requirement in the NP for development to follow the guidance in the VDS. The VDS will be updated after the Conservation Area Appraisal has been signed off by EDDC. The design policies within the NP will come into force in the interim.
	CAP23	Nursery Land has been put forward as a preferred development site and this is inconsistent with the statement that ‘development of Millfield and the Nursery Field will be resisted’. Any development there must preserve the open views from the brook and retain the oak tree.	Amended
LYMPSTONE LANDOWNERS ASSOC. (David Tyrell)		Failure to consult	This is well covered in the Consultation Statement Appendix I. Independent review by Planning Aid has supported the Consultation process All groups and individuals have been given every opportunity to comment

NATURAL ENGLAND		Various comments about the Plan's relationship with the Local Plan and, the Habitats and Species Regulations and need for a Strategic Environmental Assessment.	Points noted – SEA in progress and this should answer most of the outstanding queries.
NETWORK RAIL	CAP11	NR mention improving Exmouth station but no mention of Lymptstone. They are not considering a 15 minute service at present. Concerned about impact of development on level crossings.	The response does nothing to enhance the detail already contained in the DCC Transport Policy.
RSPB	CAP 6 CAP 16 CAP20 CAP22 CAP22	Generally concerned about the impact of development on significant local sites, and the cirl bunting population, and how this can be mitigated. General support for these policies with detailed suggestions for strengthening them.	Points noted and where possible CAPs have been hardened to DMPs.
STRATEGIC LAND PARTNERSHIPS	1	Introduction – P3 NP cannot be approved until formal adoption of the Local Plan.	It is accepted that ideally the NP would follow an adopted Local Plan but there is no reason that a NP cannot be produced in advance of a Local Plan .(see examiner's report on Tattenhall Neighbourhood Plan)
	2	Policy Map (p7) (disagree) – ref 1 above – alterations to strategic policies have not been tested and approved at EIP and cannot be relied upon.	If the Strategic Policies change the NP will need amending
	3	6 Housing (p11) (disagree) – The assumed housing numbers for Lymptstone may well alter following EIP.	We are working on the numbers given by EDDC – should these change then the NP will need amending.
	4	Location – Objective H1 (p14) (disagree) – This proposed DMP should be deleted since it is a duplication of (draft) Local Plan policy. Need – Objective H2 (p14) (disagree) - This objective should not ignore the future need to accommodate expansion of Exmouth whose boundaries are constrained by higher designations to the NE, E and S. Density and Scale – Objective H3 (p15) (disagree) – This is too prescriptive and should be deleted or substantially revised. Design – Objective H4 (p15) (disagree) – This is too prescriptive and should be deleted or substantially revised.	This DMP has been re-drafted and complements EDDC policy This is a Neighbourhood Plan for Lymptstone and addresses the needs of the Parish in line with EDDC requirements. This has been revised The expansion of Exmouth is now dealt with in the section on Goodmores Farm This has been revised This has been revised
	5	CAP 1 to 5 (pgs 16 and 18) (neither) – These should not	We believe, and intend, these to be in line with EDDC

		<p>conflict with East Devon Development Control Policies.</p> <p>CAP 10 (p23 (disagree) –The Neighbourhood Plan cannot and should not pre-empt the alignment and character of the Dinan Way Link – this will be determined by technical assessment and transport requirements at the time. The reference to ribbon development and coalescence should be deleted – these are a matter for the Local Plan to address (probably on future review) and are not relevant to delivery of the Dinan Way Extension itself.</p> <p>CAP 20 (p29) (disagree) – should be deleted, it is a duplication of (draft) Local Plan policies.</p>	<p>policies and have not been advised by EDDC to the contrary</p> <p>The comments on Dinan Way have been re-drafted and strengthened. This a major development in the parish and these policies reflect the will of the Lypstone Community and accordingly will be the policies of Lypstone Parish Council. They will be brought forward in the proper manner when and if Dinan Way Extension is brought forward to Consultation Stage</p> <p>No not duplication – reinforcement.</p>
	6	<p>The Natural Environment (p31) (disagree) –Emotive references to "Devon Banks" are unhelpful and should be withdrawn. The work undertaken was for an agricultural purpose and entirely within both planning regulations and the law.</p>	<p>Major landowners such as Clinton Devon Estates see no need to fence off arable land from the South West Coast Path. The banks bear little resemblance to traditional Devon Banks. Nevertheless this sentence has been removed.</p>
	7	<p>Appendix A (p6) - Scoring Matrix –ref W202 (disagree) –Land to NW of Courtlands Cross –there appears to be a lacking of understanding that development at this location would serve the housing needs of Exmouth (being on the boundary between Lypstone Parish and the Exmouth urban edge) in a similar manner to Goodmores Farm – Lypstone village itself being distant from both locations. As such the scoring matrix used is not appropriate or representative in terms of site ref W202.</p> <p>We note that Goodmore's Farm is not included in the matrix possibly for the same reasons</p>	<p>The evaluation of all SHLAA and non-SHLAA locations was undertaken using the same evaluation measures. These were based on the EDDC Sustainability Objectives. The final short list was then further scrutinised by completing Site Assessments – see Appendices E and H.</p> <p>The history of Goodmores Farm has been documented in a new Appendix N (by request during the consultation). You will note that agreement to Goodmores was made by Lypstone Parish Council as far back as the Summer 2011. Goodmores Farm is also different from Land to the NW of Courtlands Cross since the location straddles the Parish/Town boundary is not Green Wedge or CPA. It is also far better related to existing blocks of residential development The Courtlands Cross site was not considered a suitable site for housing by the Planning Inspector in 2012</p>

	8	Appendix D (pl) (disagree) – See previous comments ref Objectives in HI/H2/H3/H4 also CAP 1 to 5 and CAPS 10,20.	Appendix D is merely a list of all the policies contained in the main body of The Plan. It will be updated in line with the policies contained within the final version of The Plan
PITT LANE FARM NEIGHBOURHOOD GROUP (Andrew Kimber)	CAP10	Not explicit enough and suggest wording changes – preferred route should be to build over Summer Lane.	DCC are opposed to any specific route being identified at this stage
WOODBURY PARISH COUNCIL		Support, particularly improving transport links Exeter to Exmouth	Thanks