

Date: 14 October 2016  
 Contact number: 01395 571745  
 Email: [tspurway@eastdevon.gov.uk](mailto:tspurway@eastdevon.gov.uk)  
 Reference: TS/F/04/29



East Devon District Council  
 Knowle, Sidmouth, EX10 8HL  
 DX 48705 Sidmouth  
 Tel: 01395 516551  
 Email: [csc@eastdevon.gov.uk](mailto:csc@eastdevon.gov.uk)  
[www.facebook.com/eastdevon](http://www.facebook.com/eastdevon)  
[www.twitter.com/eastdevon](http://www.twitter.com/eastdevon)

### Response to the submission of the East Budleigh with Bicton Neighbourhood Plan

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

EDDC Cmmt No	Issue / Policy In Plan	Comment
1.	Contents page	In the interests of navigating the document, it would be useful if the policy references were included in the contents page.
2.	Policy referencing	The labelling of the policies may cause some confusion due to the similarities and crossover with the Local Plan development management policies, particularly with regard to the use of D1-D3. This could possibly be remedied through the re-labelling of policies to make them clearly distinct. One possible solution would be to re-label them all to EB1-EB23.
3.	Policy P2	This policy is fairly onerous and also assumes that fibre optic broadband and/or other communication networks are available to connect into, throughout the Neighbourhood Plan area. There are concerns that 'new development' is far wider reaching than simply new residential or employment buildings or uses and it would not be reasonable or desirable for everything falling under the definition to have broadband infrastructure installed. The Government have also reduced the amount of supporting information which local authorities can require so, whilst a connectivity statement is certainly desirable, it is not something that could normally be insisted upon. A potential solution might be to replace the second paragraph with a statement that new residential and employment development will be required to make provision for connection to high speed fibre optic broadband and other communication networks where they are available, or proposed, in the vicinity of the development and that the

East Devon – an outstanding place

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



EDDC Cmmt No	Issue / Policy In Plan	Comment
		planning application should explain how this is to be achieved.
4.	Policy P3	As written, it is unclear whether in order to be successful whether all or just one of the criteria set out needs to be met. It is assumed that only a single criterion should be met and therefore it is recommended the word 'or' is inserted after each criterion.
5.	Policy E1	Bullet point 2 should not only recognise the impact on the AONB, but in the first instance avoid impact and where this is unachievable incorporate appropriate mitigation.
6.	Policy L1	Consideration should be given to including an extra criteria ensuring that any improvements or appropriately integrated into the landscape.
7.	Map on page 49	To properly determine the areas, the map provided should be clearer and its orientation should be landscape rather than portrait.
8.	Policy N2	Local green space number 6 is described as 'conservation area to rear of Middletown Lane', which could be misconstrued, as the actual Conservation Area designation lies some distance away to the west of the village. The wording should be altered slightly.
9.	Page 65, text below image of orchard	Small error in text- should read '...community orchard could look like...'
10.	Policy F1	In the final paragraph of this policy, we don't believe it is reasonable for an applicant to be expected to reduce the overall flood risk in the parish if they can satisfactorily demonstrate that they have mitigated any risk posed by the proposed development. This final statement should be removed.
11.	Policy F2	The first sentence of the second paragraph appears to be a repetition of the previous paragraph and should be removed.
12.	Policy D1	This policy should include a statement advising that housing development will be acceptable within the proposed boundary. The inclusion of the phrase 'which represents the limits to development in the village' is also slightly misleading as further development may come forward under the exceptions site policy and indeed, a site outside the boundary has been allocated for this purpose in the plan itself- this statement should therefore be removed. The third paragraph adds a layer of confusion by stating that even if land is situated within the boundary, it may not be assumed to fall within the developable confines of the village. This would appear to be unnecessarily restrictive and does not give the certainty that a boundary should be providing. Other policies, including N1 ensures that the character of new development and the impact on the landscape is acceptable and therefore this paragraph should be removed.
13.	Para 14.18	There is a small discrepancy when referencing the Government's updated affordable housing thresholds. These don't apply to rural exception sites and for rural areas EDDC has adopted a 5 unit

<b>EDDC Cmnt No</b>	<b>Issue / Policy In Plan</b>	<b>Comment</b>
		threshold so for sites of between 6-10 dwellings a commuted sum will be payable. This should be corrected.

Yours sincerely,

Tim Spurway  
Neighbourhood Planning Officer