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Report on Dunkeswell Neighbourhood Plan 2014 to 2031

An Examination undertaken for East Devon District Council with the support of the Dunkeswell Parish Council on the March 2017 submission version of the Plan.

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Main Findings - Executive Summary

From my examination of the Dunkeswell Neighbourhood Plan and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Dunkeswell Parish Council;
- The Plan has been prepared for an area properly designated – the Parish Council area as shown on Figure 1;
- The Plan specifies the period to which it is to take effect – from 2014 to 2031; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to Referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Dunkeswell Neighbourhood Plan 2014 - 2031

- 1.1 The parish of Dunkeswell lies to the north of Honiton within the Blackdown Hills Area of Outstanding Natural Beauty (AONB). It is a rural parish situated on a high plateau 240m above sea level which is cut on its steep northern and more gently sloping southern edges by rivers and streams. The historic village of Dunkeswell is at the heart of the parish, set within a tight wooded valley cut into the plateau. To its west on high open ground is the World War II Dunkeswell airfield which remains in use for light aircraft. Modern industrial units have been developed on part of the former wartime airfield and there are a number of the original military buildings, including large aircraft hangers, still there which are in use for a variety of storage and employment uses.
- 1.2 On high ground to the south of and separate from the historic village is the modern estate of Highfield, developed in the 1980s on the site of former service personnel accommodation and comprising around 550 houses with a small shopping centre. Other than the airfield and its

employment areas, the outlying areas of the parish are predominantly in agricultural use. In 2011 the parish had a population of 1,584 in 764 households.

- 1.3 Dunkeswell Parish Council has a history of plan making over the last two decades, producing a Parish Plan in 2003 which was updated in 2007 and 2011. The Neighbourhood Plan (NP) has been prepared by a steering group of residents and parish councillors. Work on the NP started in April 2012, with the formal application for designation as a Neighbourhood Area approved by East Devon District Council in October 2012¹. A Community Consultation and Engagement Plan was then prepared setting out the relationship between the development of the NP and consultation and engagement with the local community. The Consultation Statement, which accompanied the submission version of the Plan, details the stages in the plan preparation process and the results of consultation with residents, businesses and strategic stakeholders.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Dunkeswell Neighbourhood Plan by East Devon District Council, with the agreement of the Dunkeswell Parish Council.
- 1.5 I am a chartered town planner and a former government Planning Inspector, with some 40 years of experience in the public and private sector, latterly dealing with major planning appeals and examining development plans and national infrastructure projects. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft plan.

The Scope of the Examination

- 1.6 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

¹ Appendix 2 Basic Conditions Statement.

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- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the Plan meets the Basic Conditions;
 - Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the Local Planning Authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the Plan proceed to referendum; and
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 ('the 2012 Regulations').

1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.9 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan for the area;

- Be compatible with and not breach European Union (EU) obligations; and
- Meet prescribed conditions and comply with prescribed matters.

1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the neighbourhood plan should not be likely to have a significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European Offshore Marine Site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007), either alone or in combination with other plans or projects.

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of East Devon District Council, not including documents relating to excluded minerals and waste development, is the East Devon Local Plan 2013-2031, adopted in 2016. It is up to date and provides the relevant strategic background for assessing general conformity. The District Council is progressing a Proposed Submission East Devon Villages Plan, consultation on which finished at the end of May 2017. It identifies built up area boundaries for the settlements identified in Local Plan Strategy 27. Dunkeswell is not listed in Strategy 27 and is not covered by the draft Villages Plan.
- 2.2 East Devon District Council is a partner in the emerging Greater Exeter Strategic Plan, along with Exeter City, Teignbridge and Mid Devon Councils. It is at an early stage in preparation with a recent consultation on issues and a call for evidence.
- 2.3 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the Submission Version Dunkeswell Neighbourhood Plan 2014 to 2031, dated March 2017;
 - Figure 1 of the Plan which identifies the area to which the proposed neighbourhood development plan relates;
 - the Consultation Statement, dated February 2017;

- the Basic Conditions Statement, dated February 2017;
- the Sustainability Appraisal, dated January 2017;
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the Strategic Environmental Assessment (SEA) Screening Report prepared by East Devon District Council, dated March 2015².

Site Visit

2.5 I made an unaccompanied site visit to the Neighbourhood Plan area on 9 June 2017 to familiarise myself with it, and to visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations or Public Hearing

2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan, and presented arguments for and against the Plan's suitability to proceed to a referendum. There has been no request for hearing sessions to be held.

Modifications

2.7 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

3.1 The Dunkeswell Neighbourhood Plan has been prepared and submitted for examination by Dunkeswell Parish Council which is a qualifying body, for an area that was designated by East Devon District Council in October 2012.

3.2 It is the only neighbourhood plan for Dunkeswell Parish, and does not relate to land outside the designated neighbourhood area.

Plan Period

3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2014 to 2031. Whilst the East Devon Local Plan covers the period

² Appendix 3 of the Basic Conditions Statement.

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2013 to 2031, this is not a matter on which anything rests in this case and, as noted in the Basic Conditions Statement, the NP aligns with the end date of the Local Plan.

Neighbourhood Plan Preparation and Consultation

- 3.4 The Consultation Statement (February 2017) provides full details of the public engagement that has taken place in the evolution of the NP. The Parish Council decided to prepare a Neighbourhood Plan in April 2012, applying for designation and establishing a community based steering group of local residents along with parish councillors and the parish clerk. A Community Consultation and Engagement Plan was also prepared and an early decision was taken to have a Neighbourhood Plan page on the Parish Council's website, kept up to date so that all relevant documents were easily accessible online and to give a convenient and rapid method for feedback.
- 3.5 Launch events for businesses and individuals were held in May/June 2014 and a community questionnaire was distributed to every household in the Parish and made available online. Two hundred and ninety-eight were completed and returned. Community based groups, organisations and local businesses were also contacted through the summer of 2014 and a specific approach made to engage with young people. A business survey was undertaken during September 2014 and Community Workshop and Housing Forum events were held in October 2014. In addition to articles in local newspapers and newsletters, notice boards, banners and posters, engagement and communication methods used included social media, blogs, coffee mornings and focus groups and an e-steering group. A schedule of consultation events is given on page 3 of the Consultation Statement and the key findings are summarised on pages 7, 10 and 11.
- 3.6 The Regulation 14 consultation on the emerging Dunkeswell Neighbourhood Plan was held from 1 October to 30 November 2016. A letter and response form were circulated to all dwellings and businesses within the Parish and local groups and organisations were also informed by email. The Plan could be viewed online or in hard copy at various locations in the parish. Of the 32 comments received from the community³, most were supportive and general in nature and as a result, few changes were made to the Plan. In addition, key statutory and strategic stakeholders⁴ were consulted and their responses are detailed at Appendices 2C and 2E of the Consultation Statement.
- 3.7 Consultation in accordance with Regulation 16, when the Plan was submitted to East Devon District Council, was carried out for a 6-week period ending 10 May 2017 and 9 responses were received. I am satisfied that a transparent, fair and inclusive consultation process has been followed for this Neighbourhood Plan, that has had regard to advice in the

³ Appendix 1N of the Consultation Statement.

⁴ The list is at Appendix 2D of the Consultation Statement.

PPG on plan preparation and is procedurally compliant in accordance with legal requirements.

Development and Use of Land

- 3.8 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act. However, policy DP1 does not relate to the development or use of land and I have recommended a modification in paragraph 4.57 (**PM18**) to delete this policy.

Excluded Development

- 3.9 For the reasons set out at paragraphs 4.54 to 4.56 below, I am satisfied that the Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.10 The Basic Conditions Statement advises that in preparing the NP, regard was had to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and that it complies with the Human Rights Act 1998. East Devon District Council has not alleged that Human Rights might be breached. I have considered this matter independently and I have found no reason to disagree with that position.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The NP was screened for SEA by East Devon District Council. This is also a legal requirement under Regulation 15(e)(1) of the 2012 Regulations. The District Council found that it was unnecessary to undertake SEA and neither Historic England, Natural England or the Environment Agency, when consulted, disagreed with that assessment. Having read the SEA Screening Opinion, and considered the matter independently, I agree with that conclusion.
- 4.2 The NP was further screened for Habitats Regulations Assessment (HRA), which the East Devon District Council concluded was also not triggered. The NP area is not in close proximity to a European designated nature site. Natural England agreed that the Plan could be screened out from further stages of assessment because significant effects are unlikely to occur, alone or in combination with other plans and projects. On the basis of the information provided and my independent consideration, I am satisfied that the NP is compatible with EU obligations.

Main Issues

- 4.3 Having regard for the Submission Version of the Dunkeswell Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are four main issues relating to the Basic Conditions for this examination. These are:
1. Whether, having regard for the parish's location within the Blackdown Hills AONB, the NP will protect and conserve the natural, built and historic environment of Dunkeswell parish, having regard to national policy and guidance and in general conformity with the strategic policies in the Local Plan;
 2. Whether the policies in the NP relating to Dunkeswell airfield and industrial estate, strike an appropriate balance between their active use as a focus for employment, the site's historic interest and the need to respect the character of the surrounding landscape, so as to contribute to the achievement of sustainable development;
 3. Whether the policies for housing, community facilities, the local economy and transport and accessibility provide an appropriate framework to shape and direct sustainable development, having regard to national policy and guidance and are in general conformity with the strategic policies in the Local Plan;
 4. Whether the remaining policies in the Plan meet the Basic Conditions, with particular reference to having regard to national policy and guidance.

Introduction

- 4.4 The Foreword to the NP explains that the Dunkeswell NP builds on many years of parish planning work and on the planning work of the Blackdown Hills AONB team. Chapter 1 then goes on to give a brief description of the area and to explain how the neighbourhood plan has evolved, helpfully setting out the status of the NP, when made, and its relation to the district, county and national planning documents and the need for the NP to contribute to the achievement of sustainable development.
- 4.5 The Vision Statement and the aims and objectives of the NP, which were arrived at following extensive community consultation and discussion, are set out in Chapter 2. I consider that these early chapters set out a clear and robust structure for the planning of the area over the next 14 years. They come from consultation with the local population and businesses and have regard to national and local planning policy.

4.6 The NP includes 22 policies that fall to be considered against the Basic Conditions. When made, the NP will form part of the development plan and the PPG advises that NP policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. Policies should be concise, precise and supported by appropriate evidence⁵. With this also in mind, I now turn, in the following paragraphs, to address each of my four main issues.

Issue 1 – Protecting and conserving the natural, built and historic environment

4.7 Dunkeswell lies within the Blackdown Hills AONB and is wholly within the Blackdown Hills Landscape Character Area. The parish is situated on a high plateau that is cut into by tributary streams of the Madford River flowing to the north and the River Wolf to the south. Other than the former World War II airfield, it is an agricultural area and characteristic landscape features include the scattered woodland and copses, the field patterns and the distinctive 'Blackdowns', hedgerows beside the narrow lanes. These hedge banks are also recognised as important for wildlife. Although there are no internationally or nationally designated nature conservation sites in the parish, there are ten county designated wildlife sites and four ancient woodland inventory sites⁶. Paragraph 3.14 of the Plan refers to the protection of ancient woodland and that its loss should be '*wholly exceptional*'. However, neither Local Plan policies D2 and D3 nor the NPPF use those words, and in the absence of any information as to their provenance, I regrettably feel I have no option but to recommend that they are deleted from the NP **(PM1)**.

4.8 The NPPF gives great weight to conserving landscape and scenic beauty in AONBs, which have one of the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are also important considerations⁷ in AONBs and, more generally, the NPPF advises that planning policies should seek to minimise impacts on biodiversity and geodiversity. National policy is carried forward in the objectives of the Blackdown Hills AONB Management Plan 2014-2019 and in the East Devon Local Plan through Strategy 5 (Environment), Strategy 46 (Landscape Conservation and Enhancement and the AONBs), and Strategy 47 (Nature Conservation and Geology).

4.9 The NP refers at paragraph 3.6 to the importance placed by local people on the high quality of the environment and its associated biodiversity. In particular, consultation with the local community identified three matters of concern; that new development should incorporate landscaping proposals, encouragement for the use of native trees and plants, and

⁵ PPG Reference ID: 41-041-20140306.

⁶ Map of Biodiversity sites page 18 of the NP, reproduced from the Written Evidence.

⁷ NPPF paragraph 115.

protection for the traditional Devon hedges. These matters are addressed in policy NE1 which seeks to retain, conserve and enhance the natural beauty of the parish, and provides, where appropriate, for the use of mitigating measures, and is in general conformity with the strategic policies of the Local Plan.

- 4.10 The East Devon District Council has suggested in its formal response that policy NE1 should refer to its own and Devon County Council's landscape character assessments of the area. Whilst these documents could be usefully referenced in the key supporting evidence listed underneath the policy in the NP, I note that they are named in Local Plan Strategy 46 and I see no need for them to be specifically mentioned in policy here.
- 4.11 However, I am not satisfied that policy NE1, as drafted, provides the necessary clarity and precision of wording for a decision maker to be able to apply it consistently and with confidence, as required by the PPG. In particular the first part requires that '*there are no adverse impacts on the natural environment*', but if taken to extremes the effect of that would be that no development would be acceptable. I therefore propose to modify the policy to include the word '*significant*' before '*adverse impacts*.' As proposals for development would have to demonstrate that there would be no significant adverse impacts on the natural environment, what would be significant and adverse would be dependent on the development and the site circumstances, in particular the quality of the landscape and biodiversity. For that reason, I am not persuaded that policy NE1 should be limited to protecting only features of high nature conservation value, landscape value or mature trees where they exist on the site⁸.
- 4.12 Much of Dunkeswell parish is undisturbed open countryside and will have natural and starry skies, recognised as one of the sights which makes the Blackdown Hills so special and where the AONB Management Plan seeks to conserve and enhance the area's tranquillity by restricting or reducing noise and light pollution. Paragraph 123 of the NPPF requires that planning policies and decisions should aim to identify and protect areas of tranquillity which remain relatively undisturbed by noise and by encouraging good design, limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation (paragraph 125). In addition to Strategy 46 on the AONBs, Local Plan policy EN14 deals with the control of pollution and resists development that would result in unacceptable levels of light intrusion, particularly in areas of open countryside and areas of nature conservation interest. In that policy NE1 of the NP also seeks to protect the tranquillity of the natural environment, it accords with national, AONB and local planning policy.

⁸ Representation by Gladman Developments Ltd.

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- 4.13 In the interests of consistency and the achievement of sustainable development, I am recommending a modification to the policy to replace in the first line '*development will only be supported where they demonstrate...*' with '*development should demonstrate...*', and similarly in the last part of the policy, to make it clearer how the policy will be applied. Subject to the recommended modifications **(PM2)**, I am satisfied that policy NE1 has regard to national policy, would contribute to the achievement of sustainable development and meets the Basic Conditions.
- 4.14 The Blackdown Hills AONB is a '*living landscape*', conserved and enhanced by sustainable farming, forestry and land management enterprises⁹. The NP recognises that traditional farming has defined the character of the natural environment of Dunkeswell. However, there is concern locally that changes in farming practices and land ownership could potentially impact on the special character of the area, particularly proposals for large scale farm buildings and/or intensive factory farming. To this end policy NE2 sets out criteria for agricultural development proposals that require planning permission to protect locally important elements of the farmed landscape. I am satisfied that the policy relates to the use and development of land, is in general conformity with Local Plan policies D7 and EN13, and has regard to core planning principles in the NPPF to recognise the intrinsic character and beauty of the countryside and contribute to conserving and enhancing the natural environment. A minor modification is proposed to clarify how the policy would be applied in the interests of clarity and consistency and to contribute to the achievement of sustainable development **(PM3)**.
- 4.15 It is one of the NPPF's core planning principles to always seek to secure high quality design and the Government attaches great importance to the design of the built environment, good design being a key aspect of sustainable development. The local evidence identifies the variable character of the built development in the parish, with the modern estate of Highfield on the plateau separate from and very different in character and appearance to the old village with its dense historic core within a narrow wooded valley. In accordance with Strategy 48 and policy D1 of the Local Plan, which support local distinctiveness in the built environment, NP policy BE1 seeks to ensure that new development is of a high quality of design and sympathetic to the traditional built character of the parish. The policy also advises applicants to take account of the Blackdown Hills AONB Design Guide for Houses which is appended to the NP.

⁹ AONB Management Plan 2014-2019 Section 1.5 on Farming, Forestry and Land Management.

- 4.16 I am satisfied that policy BE1 is not unnecessarily prescriptive or overly detailed¹⁰. With policy criteria to guide the overall scale, size, location, design and materials of new development to be in keeping with the character and setting of the surrounding built development, it has regard to national policy and would contribute to the achievement of sustainable development. Minor modifications are recommended to make clear how the policy would be applied in the interests of clarity and consistency **(PM4)**.
- 4.17 Dunkeswell has a number of features of historic importance, including Dunkeswell Abbey (an Ancient Monument on the at risk register), 15 listed buildings in the old village which is a Conservation Area, a Bronze Age barrow and the historic airfield and there may be other potentially important archaeological and historic assets across the parish. Policy BE2 seeks to protect these valued historic and heritage assets.
- 4.18 However, I have serious concerns that, as drafted, policy BE2 fails to have sufficient regard to national policy in the NPPF (paragraphs 126 - 141) on the staged approach that must be taken to determining the impact of a proposed development on, and the weight to be given to any harm to, the significance of a heritage asset, and the separate balancing exercises that need to be undertaken for designated and non-designated heritage assets. For this reason, I also am not satisfied that policy BE2 is in general conformity with the strategic policies of the East Devon Local Plan, more particularly Strategy 49 and policies EN6 to EN10. Furthermore, in my view, the NPPF and Local Plan policies provide sufficient protection for heritage assets. I am therefore proposing to modify the NP to delete policy BE2 **(PM5)** to ensure that the Plan meets the Basic Conditions.
- 4.19 Subject to these modifications being made, I am satisfied that the NP policies for the protection and conservation of the natural and built environment (alongside the protection to the historic environment already provide by the NPPF and Local Plan) of the parish have regard to national policy, are in general conformity with the strategic policies of the development plan for East Devon, and would contribute to the achievement of sustainable development, thus meeting the Basic Conditions.

Issue 2 – Whether the policies for the airfield strike an appropriate balance so as to contribute to the achievement of sustainable development

- 4.20 A key finding of the 2014 community survey was the value placed by the community on the preservation of the historic Dunkeswell airfield. The airfield is important as a non-designated heritage asset and includes designated heritage assets; five of the original buildings, including the

¹⁰ Representation made by Gladman Developments Ltd.

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Watch Office and Operations Block, being Grade II listed. In addition to its use by privately owned light aircraft, the airfield is used by skydivers and for helicopter sightseeing trips; modern industrial units have been built alongside the runway as well as a purpose built industrial estate at Flightway opposite. A number of the original wartime buildings also remain and are occupied by low key storage and employment uses. Through its policies the NP seeks to achieve a balance between the appropriate and active use of the airfield as an aviation base and the industrial estate as a focus for employment, with the site's historical interest and the need to respect its setting and the surrounding natural environment.

- 4.21 Objectives in the AONB Management Plan recognise the need to conserve and manage the historic environment and cultural heritage of the Blackdown Hills, which includes its strategic wartime importance. The NP, as required by paragraph 16 of the NPPF, is, through its policies for the airfield, planning positively to support local development, shaping and directing development in the area that is outside the strategic elements of the Local Plan, but which is in general conformity with its development management policies.
- 4.22 I am satisfied that the criteria set out in policy BE3 provide an appropriate framework for the consideration of proposals for development at the airfield and strike the right balance to achieve the Plan's stated objective to *'support the use of the historic airfield and leisure opportunities in employment, without significantly increasing noise, traffic and pollution'* (sic). Again, in the interests of consistency and the achievement of sustainable development, I am recommending a modification to the policy to replace *'will only be supported:'* with *'should demonstrate that:'* which makes it clearer to prospective applicants how the policy would be applied **(PM6)**.
- 4.23 The NP refers at paragraph 8.9 to concerns to improve the visual appearance and security of the airfield industrial estate whilst ensuring that its historic character is not affected. Policy LE2 is generally supportive of proposals to improve security and the appearance of development on the estate whilst resisting unacceptable changes of use. In including policy criteria against which any proposed changes of use will be considered, the NP has had regard to the NPPF at paragraph 19, it supports sustainable economic growth with a policy flexible enough to accommodate needs not anticipated in the Plan and which would allow a rapid response to changes in economic circumstances. It is in general conformity with strategic policies of the development plan for East Devon.
- 4.24 When made, the NP will form part of the statutory development plan and as such, policies should be clear as to how they will be applied. For this reason, and in the interests of consistency and the achievement of

sustainable development, I am recommending modifications to the wording of policy LE2 **(PM7)**.

- 4.25 There are live-work units at The Laurels on the airfield industrial estate and the NP, through policy LE1, supports the principle of more units of this type being provided principally, though not exclusively, there. It is consistent with policy RET 1/B of the AONB Management Plan, which supports the development of sustainable employment opportunities, and with paragraph 28 of the NPPF to promote a strong rural economy. As an existing employment site in a rural area, Local Plan policy E7 allows for the extension of the existing industrial estate, which would be in accord with Strategies 4a and 7 of the Local Plan.
- 4.26 The District Council in commenting on the submission version of the NP noted the need in developing new live-work units to ensure that the residential use is compatible with the neighbouring uses. I agree that this should be addressed in policy LE1 and I am proposing a modification to criterion iv) to add after *'unacceptable nuisance to'* the words *'and would be compatible with'* before *'neighbouring premises/properties'*. However, in the absence of any justification as to why a local economic need for the units is required to be demonstrated and why they need to be occupied within 6 months of completion, I am deleting criterion i). I am also deleting criterion v), as drafted, as unnecessary and contradictory. The last part of the policy relates to applications to change the use of live-work units to wholly residential. As drafted it includes justification as well as policy and I am recommending it be simplified to make clear how it would be applied. In the interests of clarity and consistency and the achievement of sustainable development, I am recommending that the three distinct parts of policy LE1 are clearly identified as A, B, and C and other minor modifications to clarify how it would be applied **(PM8)**.
- 4.27 It is Government policy to promote sustainable transport. The roads between the main housing estate, the old village and the industrial estate and airfield do not have footways and are often busy with traffic including heavy goods vehicles travelling to and from the industrial estate, discouraging walking or cycling. It is a long-held ambition of villagers to have a safe footpath link to the industrial estate. This is also supported by local businesses and the NP sets out the Parish Council's intention to be pro-active on this matter. Subject to a modification to clarify that the route is to link Highfield and the old village to the industrial estate **(PM9)**, I am satisfied that policy TA2 relates to the use or development of land and is in general conformity with the sustainable transport policies of the Local Plan¹¹.

¹¹ Strategy 5B and policy TC4.

4.28 Subject to the recommended modifications being made, I am satisfied that the policies in the NP, relating to Dunkeswell airfield and industrial estate, have regard to national policy, are in general conformity with the strategic policies of the Local Plan, and would contribute to the achievement of sustainable development, thus meeting the Basic Conditions.

Issue 3 – Whether the Plan provides an appropriate framework to shape and direct sustainable development

4.29 The NP includes policies on housing, community facilities and services, the local economy, and transport and accessibility.

Housing

4.30 Chapter 5 of the NP deals with housing and paragraph 5.1 notes the support in national policy and guidance for the role of housing in supporting the broader sustainability and vitality of villages and smaller settlements. Dunkeswell village, taken to include the old village along with the modern Highfield estate, is the main settlement in the parish. It is not identified on the Local Plan District Proposals Map as a settlement with built up area boundaries, and therefore is not considered under Local Plan Strategy 6 as appropriate to accommodate growth and development. In the countryside, Local Plan Strategy 7 limits development unless permitted by another specific Local Plan or Neighbourhood Plan policy, and where it would not harm the area's distinctive landscape, amenity and environmental qualities.

4.31 National policy in the NPPF requires, in rural areas, that local planning authorities should be responsive to local circumstances and plan housing to reflect local needs *'including through rural exception sites where appropriate'*¹². To this end, Strategy 35 of the Local Plan allows for mixed affordable and open market housing schemes on exception sites *'outside of built up area boundaries' ... 'where there is a proven local need demonstrated through an up to date robust housing needs survey'*.

4.32 Dunkeswell has accommodated significant growth over the last 30 years and the earlier Parish Plan indicated a strong feeling from the community that there should be no further housing development. Over the last 15 years, there has been an average annual completion rate of around 6.7 dwellings per annum with permissions outstanding for a further 18 dwellings. The 2014 Shared Ownership Housing Assessment report indicated a potential demand from the existing population for at least 3 shared ownership homes and consultation responses supported the provision of affordable housing. Whilst the Plan notes that the real

¹² NPPF paragraph 54.

housing needs locally are focused less on affordable social housing than on the availability of a range of housing type and tenure, including housing for the elderly, there has been no comprehensive up to date survey of housing needs. This is an action that the Parish Council intend to take forward outside of the NP.

- 4.33 The NP does not allocate any housing sites and policy HP1 requires that any proposal for new housing must demonstrate how it responds to identified needs, in terms of both housing type and tenure, based upon an up-to-date housing need assessment. I am satisfied that policy HP1 provides clear guidance as to what would be required to accompany any application for housing development, based on local circumstances. It is consistent with both national and local policy on housing in the countryside, and I consider that policy HP1 meets the Basic Conditions.
- 4.34 Policy HP2 deals with making best use of housing in the countryside and refers to proposals for the conversion, sub-division and extension of existing residential buildings or redundant structures, such as barns, being supported subject to meeting the requirements of Local Plan policy D8 and, in particular, part 1) and criterion c) of that policy. The District Council has commented that *'it is difficult to see exactly what value policy HP2 adds to the decision making process'* as it specifically requires compliance with and duplicates an existing adopted policy.
- 4.35 The PPG in advising on how NP policy should be drafted is clear that it should be distinct to reflect and respond to the unique characteristics and planning context of the specific NP area for which it has been prepared. Paragraph 1.16 of the Plan describes the relation between the policies in the NP and policy and guidance at national and district-wide level. Whilst acknowledging that in some cases policies may appear to be seeking similar or the same outcomes, it goes on to state; *'but importantly, where this is the case our NP policies provide our community the opportunity to add a local dimension or detail to those more strategic policies*'
- 4.36 However, there is nothing in the NP, Basic Conditions Statement, or the written evidence, that I see as giving an expressly local dimension or any explanation as to what makes policy HP2 distinct. Moreover, I am concerned that, as drafted, policy HP2 is unclear and ambiguous in that it requires the conversion, extension and sub-division of existing homes to comply with Local Plan policy D8, when that policy deals only with the re-use and conversion of buildings in the countryside. If the intent of policy HP2 is to help bring dis-used buildings back into use, as paragraph 5.11 of the Plan suggests, then I consider that Local Plan policies provide sufficient guidance. For these reasons, I am not satisfied that policy HP2 has had sufficient regard to advice on policy drafting contained in national guidance and so fails to meet that Basic Condition and I am modifying the Plan to delete it **(PM10)**.

Community facilities and services

- 4.37 The NPPF supports a prosperous rural economy and paragraph 28 advises that neighbourhood plans should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship. Paragraph 70 of the NPPF promotes healthy communities and requires that planning policies and decisions, amongst other things, should guard against the unnecessary loss of valued facilities and services and ensure that they can develop and modernise in a way that is sustainable, and be retained for the benefit of the community. These objectives are carried forward in Local Plan Strategy 4 which promotes balanced communities and Strategy 32 which resists the loss of employment, retail and community sites and buildings. Local Plan policy RC6 is generally permissive of new local community facilities outside built up area boundaries where there is a proven need and environmental and amenity criteria are met.
- 4.38 There are facilities in Dunkeswell that enable a wide range of community activities to take place. Community surveys in 2011 and 2014 indicated a relatively high level of satisfaction with them. Whilst there is now no local pub, there are two village halls in the parish, and shops, post office, doctor's surgery and pre-school in the local neighbourhood centre at Highfield. Policy CFS1 seeks to prevent the loss of these facilities and services as well as open space used for recreation and sets out criteria relating to viability, need and impact. It accords with national and local policy. However, I am deleting the reference in the policy to registered Assets of Community Value as there are no facilities or buildings in Dunkeswell on the East Devon List of such Assets. I am also modifying the wording of the policy to make it clear how it would be applied, in the interests of clarity, consistency and the achievement of sustainable development **(PM11)**.
- 4.39 The NPPF at paragraph 73 refers to the important contribution that access to high quality open spaces and opportunities for sport and recreation can make to the health and well-being of communities. Strategy 43 in the Local Plan sets out open space standards and policies RC1 and RC2 deal with the retention of land for sport and recreation and new open space and facilities. The East Devon Audit of Open Space in 2014 indicated that Dunkeswell was under-provided with outdoor sports pitches and amenity space and many of the existing spaces were in need of better maintenance or up-dating. I therefore see no reason why policy CFS2, which is supportive of improved facilities and accessibility, requires a need for proposed improvements to be demonstrated, subject to there being no adverse impact on nearby residents. As explained in paragraph 4.11 above, I am including the word '*significant*' before '*adverse impact*'.

Subject to these modifications (**PM12**), I am satisfied that policy CFS2 would meet the Basic Conditions.

Transport and accessibility

- 4.40 Dunkeswell is a rural parish and is some distance from the Strategic Road Network, the nearest trunk road being the A30 at Honiton, and it is accessible only by rural roads and lanes. It has been a long-standing aspiration of the community for a village bypass to accommodate traffic travelling to and from the airfield and industrial estate. Consultation responses from local residents and businesses expressed concerns about the speed, volume and size of traffic travelling through the village. Whilst the County Council as Highway Authority is the responsible body, I consider it appropriate for the NP to indicate, through policy TA5, its support for proposals that would help to minimise the impact of non-local traffic on existing residential areas. It accords with national policy in the NPPF on promoting sustainable transport whilst supporting a prosperous rural economy¹³, with policy TH3A of the AONB Management Plan, and with Local Plan policy TC7, and would contribute to the achievement of sustainable development.
- 4.41 A particular local issue is on-road parking and concerns about both highway safety and visual impact, particularly where off-road parking spaces are lost through the extension or redevelopment of existing dwellings. Policy TA3 deals both with proposals to provide new off-road parking, and with proposals where existing spaces would be lost, where applicants would be required to demonstrate that alternative on-site provision to meet the Local Plan standard for new dwellings could be made. It is in general conformity with Local Plan policies TC7 and TC9. Minor modifications to the wording of the policy are recommended to clarify how it would be applied (**PM13**).
- 4.42 There are also concerns about the visual impact on the village and on the AONB of standard visibility splay requirements for new accesses and that their rigorous imposition could prevent otherwise acceptable development. The Highway Authority has an agreed protocol and guidance for Highway Management in Devon's Protected Landscapes, which provides some flexibility in highway design. Policy TA4 introduced a local perspective, to consider proposals on a case by case basis to minimise the potential impact on or loss of historic banks and hedgerows, whilst having regard to highway safety. It accords with national policy in the NPPF at paragraph 58 for the achievement of good design and is in general conformity with Local Plan policy TC7.

¹³ NPPF paragraph 34.

- 4.43 It is an objective of national planning policy to promote healthy communities and paragraph 75 of the NPPF requires that planning policies should protect and enhance public rights of way and access. Policy TA1 supports the improvement and enhancement of public rights of way whilst policy TA2 (see paragraph 4.27 above) specifically supports a new walking and cycling link to the industrial estate. In that walking and cycling are sustainable modes of transport, these policies accord with the NPPF paragraph 35, with Strategy 5B and policy TC4 of the Local Plan and with access and enjoyment policies in the AONB Management Plan.
- 4.44 Subject to the modifications set out in the Appendix, I am satisfied that the Transport and Accessibility policies comply with the Basic Conditions.

Local Economy

- 4.45 Dunkeswell is a local employment centre with most of the local business activity taking place at the industrial estate at the airfield. Paragraphs 4.20 to 4.28 above deal with the airfield's industrial estate and with Local Economy policies LE1 and LE2. As a rural parish, farming is also important in the local economy and the NP is in accord with the NPPF, in supporting rural diversification to help farming businesses remain viable and to promote a strong rural economy. Sustaining and diversifying rural enterprises is supported in the Local Plan through Strategy 28 which encourages the re-use of rural buildings to provide jobs and to accommodate new and expanded businesses. The AONB Management Plan also recognises the need to support rural diversification and, in particular, encourages sustainable employment opportunities, including sustainable tourism activities, to allow people to work where they live.
- 4.46 Whilst the NPPF supports rural businesses in well-designed new buildings, I am satisfied that having regard to Dunkeswell's location within the AONB and the Steering Group's knowledge of the local area, it is appropriate for policy LE3 in the NP to only address the conversion of agricultural buildings for business or business-related purposes. If proposals come forward for new rural buildings, there are other policies in the development plan for the countryside against which they will be assessed.
- 4.47 As drafted policy LE3 requires that *'the benefits of such development (should) outweigh any harm to local character, residential amenity or highway safety'*. But it is unclear as to what would constitute *'benefits'* and benefits to whom? This would leave an applicant, and the decision maker, without a clear indication as to how an application might be considered and determined. Having regard to the advice in the PPG on the need for clarity and precision in policy drafting, I am recommending that policy LE3 is modified to delete the reference to *'benefits'* and to make clear the matters to be considered (**PM14**). Subject to these modifications being made, the policy would meet the Basic Conditions.

- 4.48 Sustainable rural tourism and leisure developments are supported in the NPPF as a form of rural diversification that can benefit rural businesses, communities and visitors whilst respecting the character of the countryside. The Blackdown Hills AONB Management Plan through policy RET 1/C supports the development of sustainable tourism activities compatible with conserving and enhancing the natural beauty of the AONB and the Local Plan, in the justification to policy E4 on rural diversification, refers at paragraph 24.4c) to recreation and tourism uses. Within the AONB, Local Plan policy E19 is permissive of extensions to existing camping or caravan holiday sites subject to meeting various criteria.
- 4.49 Policy LE4 in the NP seeks to add a local dimension to the Local Plan policy, supporting small scale camp sites, subject to criteria relating to the scale, level and intensity of development being compatible with the character of the area and not causing any nuisance to residential amenity, visual amenity, or by way of access, parking and servicing arrangements. As paragraph 185 of the NPPF makes clear, once a NP has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, its policies take precedence over existing non-strategic policies in the Local Plan for that neighbourhood. Thus, there is no need for policy LE4 to refer at v) to policy E19 of the Local Plan. Subject to the recommended modifications to clarify how the policy will be applied (**PM15**), the policy meets the Basic Conditions.
- 4.50 Paragraph 42 of the NPPF recognises that advanced high-quality communications infrastructure is essential for sustainable economic growth and Strategy 30 of the Local Plan supports improvements to electronic media links. Whilst fast and reliable connections are essential for business and residents to access services, the NP recognises that careful attention needs to be paid to the necessary connectivity infrastructure to minimise its visual impact. By requiring the development of superfast broadband to be sensitively sited and sympathetically designed, policy LE5 has regard to national policy and is in general conformity with the development plan.
- 4.51 Overall, I conclude on the third issue, that subject to the recommended modifications being made, the NP policies on housing, community facilities, the local economy and transport and accessibility provide an appropriate framework to shape and direct sustainable development. They have regard to national policy and guidance and are in general conformity with the strategic policies in the Local Plan, thus meeting the Basic Conditions.

Issue 4 – Remaining policies on energy and low carbon, waste and delivery priorities

Energy and low carbon

- 4.52 The NPPF at paragraph 93 sets out the key role of planning in supporting the delivery of renewable and low carbon energy and associated infrastructure. Paragraph 97 sets out the responsibility on all communities to contribute to energy generation from renewable or local carbon sources and that policies should be designed to maximise renewable and low carbon development whilst ensuring that adverse impacts are satisfactorily addressed, including cumulative landscape and visual impacts. Strategy 39 of the Local Plan offers in principle support for renewable or low carbon energy projects subject to adverse impacts being satisfactorily addressed.
- 4.53 The NP notes the general support in the area for smaller scale projects and in drafting policy ELC1 had regard to the 2010 report on Renewable Energy in the Blackdown Hills, which classified different types of energy schemes according to their scale and suitability for an AONB location. The approach in policy ELC1 is generally supportive of renewable and low carbon energy schemes where they are of an appropriate scale, sensitively sited, protective of the historic environment, and do not cause a risk to the safe use of the airfield. I am satisfied that policy ELC1 has regard to national policy and is in general conformity with the strategic policies of the Local Plan to support the development of renewable and low carbon energy. However, I am modifying the policy by the deletion of the last sentence which expects account to be taken of the 2010 report, referred to above (**PM16**). Although it provides useful information, it is not adopted guidance, is now of some age in a fast-moving sector and, in any event, is already referred to in the policy justification. Subject to that modification being made, I am satisfied that policy ELC1 would meet the Basic Conditions.

Waste

- 4.54 The NP at paragraph 10.1 refers to increasing support in the parish for recycling and that the Parish Council is keen to encourage and facilitate greater reducing, re-using and recycling of waste by the local community. Paragraph 7 of the NPPF refers, amongst others, to the environmental dimension of sustainable development and the role of the planning system to '*use natural resources prudently, (and) minimise waste and pollution*'. Strategy 3 of the Local Plan includes as sustainable development, the prudent use of natural resources which include '*minimising resource consumption, reusing materials and recycling*'. The AONB Management Plan is supportive at policy CC4/B of community based initiatives that promote sustainable measures to minimise waste and use of water and

promote re-use, recycling and composting *'where these are compatible with the purpose of the AONB and its special qualities'*.

- 4.55 The NP includes Chapter 10 on Waste and policy W1 deals with minimising waste in Dunkeswell including promoting *'reuse, recycling and composting'*. These are operations listed in the PPG¹⁴ as waste development and prescribed in the Town and Country Planning (Prescription of County Matters) (England) Regulations 2003 as *'county matters'*, where applications are to be determined by the waste planning authority, which is Devon County Council, in accord with the Devon Waste Plan 2014. Development that consists of a county matter is excluded development¹⁵, policies and provisions for which should not be included in a neighbourhood plan¹⁶.
- 4.56 I have considered whether policy W1 is *'excluded development'* and whether it should be removed from the NP. However, it seems to me after careful reading that what the policy is seeking to achieve is to encourage proposals for new development to include some form of physical provision that would help future occupants to take action to minimise their waste. For example, it might be the provision of a rain water butt or compost bin in the garden of a new home, larger bin stores to accommodate recycling and composting as well as refuse bins, or landscaping to incorporate reed beds to take surface water drainage off a car park. This list is not exclusive or exhaustive. On this interpretation, I am satisfied that policy W1 should not be deleted as it does not relate to excluded development. However, I am recommending a modification to the NP to clarify that Chapter 10 is about Recycling and not Waste. Subject to this modification being made (**PM17**), policy W1 would have regard to the NPPF and the prudent use of resources, be in general conformity with Strategy 3 of the Local Plan and contribute to the achievement of sustainable development.

Delivery priorities

- 4.57 Chapter 11 is entitled Delivering Priorities and refers to priorities set out in the Neighbourhood Plan Community Action Plan for projects which could draw on funding made available through Section 106 obligations and/or Community Infrastructure Levy contributions. The Community Action Plan is not part of the NP. Policies in the NP should relate to the use or development of land. As I do not know what the local priority community projects are, and therefore whether or not they relate to the use or development of land, I am modifying the Plan to delete policy DP1 (**PM18**).

¹⁴ PPG Reference ID: 28-002-20141016.

¹⁵ Section 61K of the 1990 Act (as amended).

¹⁶ Paragraph 8(1) of Schedule 4B to the 1990 Act (as amended).

4.58 On my fourth issue, subject to the modifications being made, I am satisfied that the energy and (renamed) recycling policies would meet the Basic Conditions.

5. Conclusions

Summary

- 5.1 The Dunkeswell Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the neighbourhood plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Dunkeswell Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated neighbourhood plan boundary, requiring the referendum to extend to areas beyond the plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated neighbourhood plan area.
- 5.4 It is evident that a significant amount of hard work has been put in by the Parish Council and its Steering Group since 2012 to progress a Neighbourhood Plan that reflects local opinion and which will influence the development of Dunkeswell in a positive way. The collaboration with surrounding parishes also engaged in the neighbourhood planning process, to support each other and to share resources, and the use of electronic technology and social media to reach out to the community, are to be commended. The submitted Plan has grappled with a wide range of decisions, whilst always having in mind the need to safeguard the quality of the special landscape of the Blackdown Hills AONB in which Dunkeswell is located. It contains a suite of policies which will influence development management decisions over the coming years and will help ensure the provision of sustainable development. For that the Parish Council and the local community are to be commended.

Mary O'Rourke

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 11	Paragraph 3.14 line 3 delete 'where its loss should be 'wholly exceptional''
PM2	Page 12	<p>Modify policy NE1 to read:</p> <p><i>Proposals for development should demonstrate that there would be no significant adverse impacts on the natural environment (landscape and biodiversity) and its tranquillity, or any significant adverse impacts can be satisfactorily mitigated. Applicants are encouraged to enhance the natural environment where there is an opportunity to do so.</i></p> <p><i>2nd part as in submitted NP</i></p> <p><i>Proposals for development which affect traditional Devon hedges should demonstrate that:</i></p> <p><i>i) Alternative options are impractical and the proposal is the least damaging option (to the hedgerow/bank, setting in the landscape, biodiversity and habitats): and</i></p> <p><i>ii) as in submitted NP</i></p>
PM3	Page 13	<p>Modify policy NE2 to read:</p> <p><i>After planning permission, delete 'will only be supported where they are' and replace with 'should be... '</i></p>
PM4	Page 13	<p>Modify policy BE1 as follows:</p> <p><i>In line 2 delete 'will be only supported where they' and replace with 'should:'</i></p> <p><i>In the last sentence delete the word 'also'.</i></p>

PM5	Page 14	Delete policy BE2 and renumber policy BE3 as BE2
PM6	Page 15	Modify policy BE3 (new policy BE2) by replacing 'will only be supported:' with 'should demonstrate that:'
PM7	Page 15	<p>Modify policy LE2 as follows:</p> <p>First sentence delete 'will be supported subject to proposed changes being' and replace with 'should be'</p> <p>Third sentence delete 'will only be supported where the uses do not' and replace with 'should not'.</p> <p>Criterion iv) traffic generation. Where there would be an increase in traffic movements, including HGVs, that cannot be safely accommodated on the rural road network, the proposal should include mitigation measures;....</p>
PM8	Page 16	<p>Modify policy LE1 to read:</p> <p>A. Proposals for development to enable or facilitate working or living in the same building or site should demonstrate that:</p> <p>i) The proposed units would be well related to the uses of the surrounding land and building (preferably located on the existing industrial estate);</p> <p>ii) The employment floorspace would be equal or greater than that of the residential living space;</p> <p>iii) The proposed uses would not cause unacceptable nuisance to and would be compatible with neighbouring premises/properties;</p> <p>iv) The proposed development would provide satisfactory living conditions for future occupants; and</p> <p>v) There would be no adverse impact on:</p> <p>a. The character of the built environment;</p>

		<p>b. The character of the natural environment and setting;</p> <p>c. Residential amenity;</p> <p>d. Traffic conditions;</p> <p>e. Noise; and</p> <p>f. Light pollution.</p> <p>B. Proposals which seek the change of use of existing employment space to form a live-work unit must demonstrate that such changes:</p> <p>i) Retain existing ground floor employment space; and</p> <p>ii) The occupancy of the living space is restricted to a person directly involved with the business being operated.</p> <p>C. Applications to change a live-work unit to wholly residential use must demonstrate that the unit has been actively marketed for live-work for two years; that no demand exists for its continued use for live-work; and the proposed change of use would be well related to the uses of surrounding land and buildings.</p>
PM9	Page 16	Modify policy TA2 by inserting 'and' after 'Highfield'
PM10	Page 18	Delete policy HP2 and supporting text in paragraph 5.11
PM11	Page 18	<p>Modify policy CFS1 to delete 'and registered Assets of Community value will only be supported where:' and criteria i) and ii) and replace by:</p> <p>'should demonstrate that:</p> <p>i) There is no reasonable prospect of a viable continued use of the existing building or facility which will benefit the local community;</p> <p>ii) There is a need for the proposed development; and</p> <p>iii) There would be no significant adverse impact on the special character of the area's natural and built environment.'</p>

PM12	Page 19	Modify policy CFS2 by deleting 'where there is a demonstrable need for them and' and inserting the word 'significant' before 'adverse impact'.
PM13	Page 19	Modify policy TA3 by: Deleting 'will be supported where they do' and insert 'should' In i) replace 'our' with 'the' In the second part of the policy, delete the word 'dedicated'.
PM14	Page 21	Modify policy LE3 to read: When considering proposals for the conversion of existing agricultural buildings for business or business-related purposes, regard will be had to any impact on local character, residential amenity, and highway safety; and whether the conversion would require substantial rebuilding or result in disproportionate extension.
PM15	Page 21	Modify policy LE4 by deleting part v)
PM16	Page 22	Modify policy ELC1 by deleting the last sentence.
PM17	Page 23	Modify the title of Chapter 10 by deleting Waste and replace with Recycling
PM18	Page 24	Delete policy DP1