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### Response to the submission of the Rockbears Neighbourhood Plan

Having considered the plan in detail, please find herewith East Devon District Council’s response to the submission consultation of the 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.	Para 7.1	The pebble bed heaths are under the principal ownership of the Clinton Devon Estates.
2.	Para 7.4	The text implies that County Wildlife Sites and County Geology Sites have no protection, Policy EN4 in the EDDC Local Plan does give them some legal protection. Request that the text is revised to reflect this.
3.	Para 7.9	The CVRP is not solely for SANGS, and the text should include the aim to enhance biodiversity, landscape and heritage as well.
4.	Rock01	Officers are concerned that Rock01 is inconsistent with Local Plan policy D3 which states that: “Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.”  Paragraph 7.10 rightly identifies that trees outside woodlands are a very important heritage asset for this parish. However, ash dieback is likely to result in the loss of 50% of mature ash trees that presently contribute to this important treescape. The policy should be more strongly worded to enhance the numbers of aged and veteran trees e.g. “No net loss of trees”.

East Devon – an outstanding place

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



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		<p>The text “appropriate replacement planting” should be defined as requiring 3 trees to be planted for the loss of a large tree, 2 for a medium tree, and 1 for a small tree.</p> <p>The policy would be strengthened by the addition of text recommending the protection, management and increase in area of traditional orchards, a number of which are found within the parish.</p>
5.	Rock02	<p>The policy needs to be re-worded to give the strongest protection to “important hedgerows” as defined in the Hedgerow Regulations. This would give protection to the most important Devon hedgebanks.</p>
6.	Rock04	<p>The 25 year Environment Plan published by DEFRA should be considered. This sets out the ambition to “Expand the use of natural flood management solutions: By working with natural processes, we can better protect ourselves from hazards such as flooding. Natural Flood Management involves the use of a variety of measures including tree planting, river bank restoration, building small-scale woody dams, reconnecting rivers with their flood plains and storing water temporarily on open land.”</p> <p>The wording of the policy - “Improve river management” - is not defined and could be construed as supporting an increase in the artificial control of flooding, for example by straightening rivers. The policy should be updated to refer to natural flood management.</p>
7.	Rock05	<p>Proposed protection of view c. and d. would conflict with potential Cranbrook south-east extension into the green wedge area to the north-east of Rockbeare Parish. The inclusion of views A-E could be better supported with photographs and reference to specified locations character. ie. Footpath or natural stopping point at a bench or picnic spot for walkers, cyclists, riders.</p> <p>Policy may benefit from the inclusion of the view from Rockbeare Manor over the Grade II listed parkland.</p>
8.	Rock06	<p>To the list of acceptable development in the green wedge should be added “development that supports the objectives of the Clyst Valley Regional Park, heritage, landscape or nature conservation”.</p> <p>Policy seeking to protect the green wedge may be at conflict with the emerging Cranbrook Plan with preferred options for Cranbrook expansion featuring development in the green wedge.</p>
9.	Rock08	<p>Policy may be further strengthened by the additional consideration of “the effect and cumulative impact of development on flood risk”.</p>

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10.	Rock14	<p>The policy could be further strengthened by the addition of the following wording:</p> <p>“Measures to link and extend the existing network of footpaths and bridleways, and to provide safe and attractive cycleways, will be supported. Particular support will be given to maintaining quiet lanes around Rockbeare Park and Manor, and providing walking and cycling links from Rockbeare village to Cranbrook and to Exeter Airport via Silver Lane.”</p>
11.	Rock15	<p>Policy could be strengthened by additional reference to ‘quiet lanes’ as a means of promoting safety for those travelling by non-motorised means.</p>

Yours sincerely,

Phil Twamley  
Neighbourhood Planning Officer