

No.	Organisation	<p>Comment- Note, where responses are summarized, the full response appears on the District Council website http://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/beer</p>
1	Amec Foster Wheeler on behalf of National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>
2	Bell Cornwell on behalf Clinton Devon Estates	<p>Support for the site allocation at Short Furlong to deliver affordable homes. Support for objectives 9.1 – 9.4. Concern expressed over the Short Furlong site being tied to 66% affordable housing in line with Strategy 35.</p>
3	Dorset County Council	<p>No Comment</p>
4	East Devon District Council	<p>Policy HBE4 – Suggested definition or deletion of the policy limiting large scale development of renewable energy projects, scale is less of an issue than limiting any adverse impact.</p> <p>Policy H1 - From discussions with the NPSG the 40% minimum threshold was justified primarily for the allocation of the land at Short Furlong outlined in Policy H3. Whilst we support the ambition for the 40% minimum threshold within the BUAB as a whole, we feel this may be difficult to justify and manage in practice outside of Short Furlong.</p>

Policy H3 - The BUAB shown on p49 of the Neighbourhood Plan does not include the land at Short Furlong. As such the site would continue to require 66% affordable provision in accordance with Strategy 35 of the Local plan and policy H1 in the Neighbourhood Plan.

We suggest updating the BUAB plan on p49 to include the land at Short Furlong as suggested by the landowner and agreed with the Steering Group. This change would supersede the Built-up Area Boundary shown in the Villages Plan.

We agree with the NPSG that development below 40% undermines support for the site allocation and BUAB extension to meet the local need identified by the Neighbourhood Plan. The minimum 40% threshold of affordable housing indicated in policy H1 should be contained in the main text of policy H3 to support the approach at Short Furlong.

Policy TP2 - We suggest further definition of an 'on-street' car parking space. Is this a designated painted space or just an unregulated (i.e. non-yellow line) section of road? Does the 'equivalent or increase capacity' to be provided have to be publicly useable?

Policy CFS1 - First criterion – What is 'within the area'? Should there perhaps be some requirement to be able to serve the same spatial demand for that asset? Needs clarification.

Policy T3 - Might this result in quite large/numerous developments? Whilst the environmental policies would likely restrict some development, T3 seems to leave significant opportunity for development.

Policy T4 - We suggest adding more detail on viability/market testing to avoid abuse by firstly getting permission for holiday units under policy T3 and then removing holiday occupancy restrictions under policy T4, resulting in dwellings where you would not have permitted them in the first place. We would suggest adding some market testing to assess potential viability as per LP policy E18.

5	Highways England	We are satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we have no comments to make.
6	Historic England	H3 - We ...have no objection to the allocation of the site [at Short Furlong] in principle and any residual consideration rests in whether the policy for the site can deliver the number of dwellings aspired to in the portion of the site identified above. In that respect we are happy to defer to the Council and Examiner.
7	Natural England	<p>Natural Environment chapter: page 9</p> <p>The text in this section of the Plan should explain that the Neighbourhood Plan area contains/lies directly adjacent to areas designated of European and national importance for biodiversity and geodiversity. These include:</p> <ul style="list-style-type: none"> • Sidmouth to West Bay Special Area of Conservation (SAC), Beer Quarry Caves SAC and Lyme Bay and Torbay SAC (which are of European importance) • Sidmouth to Beer Coast Site of Special Scientific Interest (SSSI) and Beer Quarry Caves SSSI (designated for their national importance). <p>In addition we suggest that the boxed text on page 11 regarding Beer Quarry Caves states their importance for wildlife and designation as a SAC.</p> <p>Policy NE2: Locally Important wildlife sites</p> <p>Policy NE2 identifies 'Hooken Landslide' and 'Rock Pools' as locally important wildlife sites. These sites form part of the Sidmouth to West Bay Special Area of Conservation (SAC) and therefore are designated sites of European importance for biodiversity/geodiversity. Great weight must be given to protection of these sites and development likely to affect these sites should only be permitted in exceptional circumstances as set out in the East Devon Local Plan (strategy 47, page 145) and the Conservation of Species and Habitats Regulations 2017. As worded policy NE2 sets out a weaker policy test than that set out in the East Devon Local plan, and the Regulations. We advise that policy NE2 is revised to acknowledge the status of these sites and to reflect the weight given to European designations in the East Devon Local Plan.</p> <p>Page 25. The para at the bottom of page 25 identifies Special Areas of Conservation (SACs) as being of national importance. The para should be corrected to state that SACs are of European importance.</p>

		<p>Figure 5 (page 26) shows sites which are designated of European/national importance but labels them as Locally Important Wildlife Sites (LIWS). This will be confusing to decision makers as it obscures the appropriate weight to be given to such designated sites in decision making. It is suggested that the Plan shows the designated status of these sites (i.e. European and national) but states that these sites are also valued locally. Please also see comments for Policy NE2 above.</p> <p>Policy H3: Land at [Long Short] Furlong We advise that the policy reflects more closely the conclusions and recommendations set out in the Habitats Regulation Assessment (HRA). The HRA recommends at para 5.4.1 inclusion of the following wording: “Any housing development will be required to undertake a project-level Habitat Regulations Assessment”.</p> <p>In addition the policy should set out, in brief, the mitigation measures referred to in para 5.1.2 in the HRA; namely the need for:</p> <ul style="list-style-type: none"> • site design to maintain and enhance connectivity of commuting habitats through and surrounding the site, • retention of suitable dark corridors, • inclusion of native planting, • implementation of long term suitable management of created and maintained habits and • appropriate and proportionate monitoring.
8	South Somerset District Council	No comment.
9	South West Water	No comment, other than confirming that the proposed level of housing would be OK to support.