

**NEWTON POPPLEFORD AND HARPFORD NEIGHBOURHOOD PLAN V4**  
**STATUTORY BODIES FORMAL CONSULTATION 1st November to 14th December 2019**

NAME	STATUTORY COMMENT	NHP Section	ACTION TAKEN <small>NCR = No Change Requested/Required</small>
East Devon AONB	We note references to the East Devon Partnership Plan throughout and in particular the Equestrian Development Guidelines (pg20). As a point of principle, we suggest the full use of <b>East Devon AONB</b> rather than ED AONB.		<i>Change made as requested</i>
	East Devon Pebblebeds is SPA and SAC	P21 -	<i>Change made as requested</i>
	Use of word 'photographed' in the subtitle title for image of beaver is unnecessary as it is clearly a photo!	Pg 22	<i>Change made as requested</i>
	You may wish to consider referencing the landscape character of the parish as this is essentially what is being referred to here -  you could consider referencing this in the appendices in map form	Pg 22 Para 2	<i>Change made as requested</i>  <i>Can't see how to reference this in map 2</i>
	<b>retaining the integrity of historic farm buildings should be a consideration for agri development – good refs</b> <a href="https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/">https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/</a>	Pg 26	<i>Change made as requested</i>  <i>Added as new (iii) in EP9</i>
	Pg 27 – the use of the term 'instead' with reference to the housing, heritage and design could be reworded in more policy appropriate language without losing the spirit of the message:  Para 2 – Instead Despite this, 67 new houses have been authorised in the parish since 2013, with further applications expected.	Pg 27	<i>Changes made as requested</i>

	<p>Para 4 - Instead A disproportionate number of the new 67 houses authorised since 2013 are large, executive style houses with only 16 being affordable; of these only 2 have 1 bedroom.</p>		
	<p>reference in grey box for Policy HQD1 - "villages with cottages and houses built of local stone, pebbles, thatch and cob, Cert (flint) should read Chert – given the whole of the parish is in the AONB the reference in para 1 to the AONB here is superfluous.</p>	Pg 35	<i>Change made as requested.</i>
	<p>Also, para 4 would read better if it said <i>Mature trees, substantial hedges and banks border the village settlements and form an integral landscape feature of their setting help to tie them into the ED AONB. These soft edges are an important part of the rural landscape that characterises the perimeter of the villages.</i> (Note consistent use of plurals, and that 'characterises' is not USA spelling – worth checking whole doc for UK spell</p>	Pg 44 - Policy TH1	<i>Reference to the AONB deleted for reason given</i>
		para 4	<i>No change to plurals, but 'four' added to show that there are multiple settlements.</i>  <i>American spellings checked and changed</i>
	<p>John Wilding is not the East Devon AONB Partnership Chairman</p>	Pg 56 -	<i>No change made. Not appropriate to alter a residents view especially as it was true at the time it was given</i>
RSPB	<p>BARRATS - Kingsbrook Aylesbury - RSPB Wildlife Corridors. Kingsbrook is being designed so that wildlife can move around and through the green space and the residential areas. Whether it is hedges, strips of wildflower grassland or gaps under fences and walls, wildlife shouldn't have the barriers it normally faces www.kingsbrook-aylesbury.co.uk I understand that at present they are planning to complete similar schemes in ten selected Cities in the UK and NI, Bristol and Bournemouth are the ones selected in this part of the world, will let you have more information in due course.</p>	Policy HQD1 bullet vi)	<i>NCR – supports HQD1 bullet vi)</i>

	<p>should be fine, there is a small "typo" which I'm sure you have already spotted. ie second line should read: <i>that they will be used <u>by most species that.....</u></i></p>		<p><i>Change made as requested</i></p>
	<p>would you like to pass on the attached which should meet the Government's Guidelines updated in July this year. It was included in a CIEEM quarterly Bulletin earlier in the year (June 2019) and represent the RSPB's views on the subject.</p> <p>It may also be relevant that the BSI's standard on integral bird boxes which I understand will be compatible with the above should be available in the summer and an addition to the National House Builders Council's Guides on the same subject should be available in the New Year.</p> <p><b><u>Bulletin of the Chartered Institute of Ecology and Environmental Management (CIEEM)</u></b></p> <p>Planning policy and the role of ecologists Under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, public bodies have a duty to protect and enhance all biodiversity. This is supported by the National Planning Policy Framework (NPPF) 2018 in paragraph 175d: When determining planning applications, local planning authorities should apply the following principles:..... opportunities to incorporate biodiversity improvements in and around developments should be encouraged.</p> <p>Recommendations Biodiversity continues to decline in the UK and swifts are just one</p>	<p>Guidance note 4</p>	<p><i>Added to second para "and should be available Summer 2020"</i></p> <p><i>Added to end of HQD1 "and para 175d – biodiversity improvements" "Natural Environment and Rural Communities (NERC) Act 2006 Section 40 - public bodies have a duty to protect and enhance all biodiversity"</i></p> <p><i>Added to Appendix 7 HQD1 "Bulletin of the Chartered Institute of Ecology and</i></p>

species suffering as a consequence. The UK Government's ambitious target to build 300,000 homes per year presents an opportunity for effective mitigation and compensation for the continual loss of existing swift nest sites. We propose the following key recommendations for all planning applications.

- Incorporate nest boxes into development projects. Nest boxes suitable for multiple species such as swift nest boxes will help more species. Although birds of any kind are good for people's health and wellbeing, budgets should be targeted at species that need help.
- Use data from the mapping tools together with ecological survey work to assess likely impacts on swifts; implement effective mitigation by installing enough swift boxes in the correct location and position.
- Wherever possible, incorporate swift bricks in new or restored buildings to increase the overall availability of nest sites for swifts and other species. Birds such as house sparrows can use swift bricks but swifts cannot use house sparrow nest bricks.
- Integral swift bricks are the preferred option on new housing developments (fitted in clusters of 2 to 4 on gables and near the roofline where swifts would naturally look for a potential nest site); on larger commercial buildings include one swift brick per 6 m<sup>2</sup> of wall, mounted near the roofline, in clusters of 3 or more, with approximately 1 m between entrance holes.
- Try to ensure swift bricks have a minimum of 5 m clearance beneath and in front, and avoid locating them above doors and windows.
- 'Tool-box' training and on-site supervision is essential to ensure swift bricks are fitted correctly and in the right places
- If in doubt, ask for advice: the Swift Local Network (SLN) group, Swift Conservation, Action for Swifts or the RSPB are always available and happy to provide help. Check their respective

*Environmental Management  
(CIEEM) – June 2019”*

	websites and contact them for one-to-one advice on a project.		
	<p>Government planning policy, within the <b>National Planning Policy Framework</b> (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Parts 96 and 97. It is also important to be aware of Sport England's statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.  <a href="http://www.sportengland.org/playingfieldspolicy">http://www.sportengland.org/playingfieldspolicy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.  <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/">http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</a></p> <p>Sport England works with local authorities to ensure their Local</p>	7.4	<p><i>NCR – Claire Rodway says that Sport England's response is a standard reply and all their points are already covered in the EDDC Local Plan.</i></p>

Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence.

It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

	<p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>		
Newton Poppleford Parish Council	<p>The Parish Council had originally requested the following wording be included in the NHP in policies EP3, EP8 and TH1;</p> <p>'independent expert commissioned by the Newton Poppleford and Harpford Parish Council and paid for by the developer'.</p> <p>We note that this wording has been removed from the latest draft and would request that the wording is reinstated in the subsequent draft.</p>	EP3, EP8 and TH1	<i>East Devon District Council Neighbourhood Planning Office previously said that this is unlikely to be allowed, but that the Parish Council's request can be forwarded to the Inspector who will make the final decision.</i>
Colaton Raleigh parish council	<p>The plan was discussed by Councillors at the last Parish Council meeting. The only comments received related to there being no mention of residents from Colaton Raleigh sharing medical facilities with Newton Poppleford</p>	M1	<i>NCR – if a medical centre is built in Newton Poppleford the NHS would decide which patients would be allowed to attend</i>
Planning Inspectorate	<p>Dismissal of Appeal in respect of Capper Close. A summary of the main reasons for dismissal were (see appeal document for full details):</p>	HQD1 and TD1	<i>Supports HQD1 and TD1</i>  <i>Added to Appendix 8</i>



The main issue is the effect of the development on the character and appearance of the area.

Reasons

- the site and the existing dwelling have a significant degree of visual prominence within the streetscene
- the proposed dwelling would appear to directly encroach upon the setting of the existing dwelling, compromising both its outlook and its relationship with Appeal Decision APP/U1105/W/19/3233791 <https://www.gov.uk/planning-inspectorate> 2 High Street.
- the proposed dwelling would be orientated with its rear elevation facing High Street different to the prevailing pattern along High Street
- Proximity to the boundary, combined with the height of the dwelling above pavement level would, accentuate the atypical aspects of the scheme increasing the visual harm caused
- Palette of materials similar to those used in older buildings along High Street would not diminish the harm caused by other aspects of the scheme.
- Although other buildings are elevated above street level, the orientations, layouts and relationships formed with other buildings are not substantially similar
- Although dwellings in Capper Close are on higher ground, the adjacent pub is large building, and the ridge heights of other buildings in the vicinity are greater, none of these points have any meaningful bearing on perception of the harm caused by the proposed development
- As the development is located within a built-up area and not exposed to the broader landscape, It would not have any obvious adverse effect on the landscape or scenic beauty of the AONB.

Conclusion - the development would have an unacceptably

	<p>adverse effect on the character and appearance of the area and would therefore conflict with Policy D1 of the East Devon Local Plan 2013 – 2031 Adopted 28 January 2016 (the LP) (requires development to respect the key characteristics and special qualities of the area) and Strategy 6 of the LP (requires development to be compatible with the character of the site and its surroundings; and provisions relating to design quality set out within the Framework)</p> <p>Had I been minded to allow the appeal, and thus circumstances existed in which planning permission could be granted, it would have been necessary for me to consider this matter in greater detail. As I am dismissing the appeal for other reasons however, further consideration is unnecessary.</p> <p>Conclusion - For the reasons set out and having regard to all other matters raised, I conclude that the appeal should be dismissed.</p> <p>Benjamin Webb INSPECTOR</p>		
Environment Agency (note – response received on 5/1/20)	<p>The neighbourhood plan’s overarching vision refers only to the natural environment in terms of the parish’s AONB setting. Nonetheless, we are supportive of the objectives relating to protecting/enhancing the natural environment and reducing vulnerability to climate change (objective 2), and protecting/enhancing green spaces.</p> <p>We welcome the range of environmental policies set out in the plan</p>		<i>NCR</i>
	- Policy <b>EP1</b> commits to the protection/enhancement of the natural environment and recognises the wide range of habitats present, including watercourses.	EP1	<i>NCR</i>
	- We welcome the intention of policy <b>EP2</b> that development at risk	EP2	<i>Change made as requested.</i>

	<p>of flooding should be avoided. However, we would recommend changing 'on designated floodplain' to 'in areas at risk of flooding'.</p>		<p><i>Heading also changed to read <b>Policy EP2 – Development on designated Flood Zones 2 and 3</b></i></p>
	<p>- We welcome the principles set out in policy <b>EP3</b> (minimise damage to existing development). However, as currently worded this policy would not strengthen or build upon national or local policy which is clear that development should not increase flood risks elsewhere. If you want the plan to help positively address existing flood risk issues in the parish then you should consider whether the policy could be amended to encourage developers to seek to reduce flood risks overall elsewhere.</p>	<p>EP3</p>	<p><i>No change made as reducing flood risk elsewhere is different to causing flood risk in the vicinity.</i></p>
	<p>- Policy <b>EP4</b> refers to flood risk assessment (FRA) requirements. We consider that the first sentence would fit better if it were moved to policy EP2.</p> <p>Furthermore, we recommend that the second paragraph is followed by text such as: 'The findings of the FRA will determine whether the exception test can be satisfied'.</p> <p>The exception test also requires development to provide wider sustainability benefits to the community. This could replace the third paragraph.</p>	<p>EP4</p>	<p><i>First para retained in EP4 as EP4 goes on to define the sequential approach.</i></p> <p><i>Added to EP4 "The findings of the Flood Risk Assessment will determine whether the Exception Test can be satisfied."</i></p> <p><i>Para 3 replaced by "The Exception Test also requires development to provide wider sustainability benefits to the community."</i></p>

	- Whilst we welcome policies <b>EP5</b> (surface water) and <b>EP6</b> (SuDS), we recommend consultation with the Devon County Council's Lead Local Flood Authority team as the lead organisation for surface water management.	EP5 AND EP6	<i>No change made as this is normal process</i>
	- We welcome part iii) of policy <b>EP7</b> which requires arrangements to control water pollution.	EP7	<i>NCR</i>
	- With regard to policy <b>EP9</b> (development on farmland for agriculture), please note that soil compaction and run-off is an issue across East Devon and results in increased nutrients and sediments in watercourses and localised increases in flood risks. It is therefore important that agricultural activities seek to improve the situation. Please consider how this policy might help address these issues.	EP9	<i>Added to EP9 "that does not cause soil compaction and increase run-off into watercourses;  Increased flood risk is dealt with by previous policies which apply all developments including agricultural.</i>
	- We also support policy <b>GS1</b> which seeks to protect local green spaces. In particular we are pleased to see acknowledgement of the recreational, amenity and wildlife benefits provided by local green spaces. It could also be noted that such spaces also provide benefits in terms of flood risk management and water quality as well as improved resilience to climate change.	GS1	<i>Added to GS1 Policy Overview "Green space also provide benefits in terms of flood risk management and water quality as well as improved resilience to climate change."</i>
Natural England (email, pre formal response)	It would be useful if the informative text below policy H2 which identifies relevant Local Plan policy could make reference to the East Devon Villages Plan and in particular the inset map for Newton Poppleford (page 31).	H2	<i>Reference added to Chapter 34 of the East Devon Villages Plan, which includes the 'inset map'.</i>

	In addition please ensure that the Neighbourhood Plan includes a map showing the extent of the Neighbourhood Plan area.	Appendix 6	<i>NCR – Neighbourhood Plan area is already shown in Map 1a</i>
Natural England (Formal response)	Natural England does not have any specific comments on this draft neighbourhood plan.		<i>NCR</i>
West Hill Parish Council	The Draft Newton Poppleford and Harford Neighbourhood Plan was discussed at the WHPC meeting last night (5th Nov). I've been asked to confirm that Cllrs: <ul style="list-style-type: none"> <li>• have no comments to submit</li> <li>• support the views on sustainable transport</li> <li>• congratulate all those involved in producing the plan.</li> </ul>		<i>NCR</i>
Exeter Airport	This parish plan is within the official safeguarded area for Exeter airport and as such consideration must be given to any forms of development that could have the potential to adversely impact on the safety of operations at the aerodrome. Aerodrome safeguarding covers a number of aspects including but not limited to; <ul style="list-style-type: none"> <li>• Protecting the airspace around an aerodrome to ensure no buildings or structures may cause danger to aircraft either in the air or on the ground. This is achieved through the 'Obstacle Limitation Surfaces'.</li> <li>• Protecting the integrity of radar and other electronic aids to navigation by preventing reflections and diffractions of the radio signals.</li> <li>• Protecting aeronautical lighting, such as approach and runway lighting, by ensuring that they are not obscured by any proposed development and also</li> </ul>		<i>No change made as Claire Rodway (EDDC NHP Officer) advised:</i>  <i>"The Local Plan addresses everything the Airport have said and I don't think there's any need for you to repeat it- their text would be incongruous as it's so specialist. We check airport implications when we register applications in the safeguarded area so please don't worry about it."</i>

	<p>that any proposed lighting could not be confused for aeronautical ground lighting.</p> <ul style="list-style-type: none"> <li>· Protecting the aerodrome from any increased wildlife strike risk. In particular bird strikes, which pose a serious threat to flight safety.</li> <li>· Preventing any construction processes from interfering with aerodrome operations through the production of dust/smoke, temporary lighting or construction equipment impacting on radar and other navigational aids.</li> <li>· Protecting aircraft from the risk of collision with obstacles through appropriate lighting.</li> </ul> <p>Any developments including large landscaping schemes should follow the normal planning consultation process so that Exeter Airport can make comment accordingly. Suggested text in this regard might include, “The Airport Operators must be consulted in relation to any proposals where the thresholds specified in the Safeguarding Maps are exceeded, or where such development is located within a 13km radius of the airports and is likely to attract birds. Such proposals should be supported by evidence and supporting justification from an airport safeguarding perspective in terms of the obstacle they would create, their effect on navigational aids, proposed lighting, and the potential to attract birds.”</p>		
National Grid	<p>Key points from National Grid response: Assets in your area National Grid has identified the following high-pressure gas transmission pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> <li>• <b>FM14 - Barrington to Aylesbeare</b></li> </ul>		NCR

	<p>• <b>FM20 - Ottery St Mary to Aylesbeare</b></p> <p>From the consultation information provided, the above gas transmission pipeline does not interact with any of the proposed development sites.</p> <p><b>Gas Distribution – Low / Medium Pressure</b>          Whilst there are no implications for National Grid Gas Distribution’s Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p><b>Electricity distribution</b>          Information regarding the distribution network can be found at: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p><b>Further Advice</b>          National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p>		
South West Water	thank you for providing details of the above the content of which is noted and upon which we have no specific comment.		<i>NCR</i>
Blackdown Hills AONB	I am aware that we are on the EDDC list of bodies for consultation, but this is really only applicable to those plans which are within, or closely affect, the Blackdown Hills. As such I can confirm that we do not wish to comment.		<i>NCR</i>

Highways	<p>Highways England is responsible for operating, maintaining and improving the Strategic Road Network (SRN) which in East Devon comprises the A30, M5 and A35, with the Plan area situated approximately 6km south of the A30.</p> <p>We are satisfied that the plan's proposed policies are unlikely to impact on the safe and efficient operation of our network and we therefore have no specific comments to make.</p> <p>This response does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>		<i>NCR</i>
Somerset West and Taunton County Council	As regards your consultation, SWT has no comments to make on the Newton Poppleford and Harpford Neighbourhood Plan at this time.		<i>NCR</i>
Historic England	I can confirm that there are no issues associated with the Plan upon which we wish to comment.		<i>NCR</i>

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East Devon District Council	Our comments (in black text) are included below for your consideration. Red text and crossing through indicates suggested specific changes to the policy wording whilst green text indicates notes which explain or expand upon the recommendations.		
	<b>Objective 1 Transport:</b> Strongly support the request for improved	<b>Objective1</b>	<i>NCR – supports Objective 1</i>



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	<p>walking and cycling provision.</p> <p><b>Objective 3 Housing:</b> all new builds should mitigate fuel poverty.</p> <p>All new housing should aspire to meeting 'building for life' criteria</p> <p><b>Objectives 2 &amp; 5 Green space:</b> These are addressed very well</p> <p><b>Objective 6 Health &amp; Care:</b> Support the request by 30% of respondents for pharmacy provision, particularly given the age demographic and accessibility of pharmacies in Sidmouth/elsewhere using public transport</p>	<p><b>Objective 3</b></p> <p><b>HQD1</b></p> <p><b>Objectives 2 &amp; 5</b></p> <p><b>EM2</b></p>	<p><i>'they mitigate fuel poverty' added to HQD1</i></p> <p><i>Bfl changed to 'building for life'. No other change as planning officer advised earlier that Bfl can only be applied to major applications. Also this conflicts with a later EDDC request.</i></p> <p><i>NCR – supports objectives 2 &amp; 5</i></p> <p><i>NCR – supports EM2</i></p>
	<p>Concern that providing more car parking spaces will exacerbate traffic congestion, parking may dominate housing schemes and space available for biodiversity and amenity will be reduced.</p> <p>Suggested textual changes:</p> <p>All developments must provide adequate <b>car and bicycle</b> parking.</p> <p>e.g.: <b>This means:</b></p> <ul style="list-style-type: none"> <li>for each <del>household</del> <b>residential development, at least one car parking space should be provided for one bedroom homes, at least two car parking spaces should be provided for two bedroom homes</b></li> </ul>	<p><b>Policy T1</b></p> <p><b>Adequate Parking</b></p>	<p><i>Change text:</i></p> <p><i>All developments must provide adequate car and bicycle parking. This means:</i></p> <ul style="list-style-type: none"> <li><i>For each residential development, parking spaces should exceed that given in the Local Plan in</i></li> </ul>

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	<p><del>etc. At least one secure bicycle parking space should be provided per bedroom. in terms of where it is situated and the number of parking spaces per dwelling, which should exceed that given in the Local Plan (i.e. one parking space should be allocated per bedroom);</del></p> <ul style="list-style-type: none"> <li><del>for other development, sufficient provision should be made for car and bicycle parking appropriate to the needs of the development;</del></li> </ul> <p><del>car park driveways should use permeable surfaces in accordance with government guidance; Note- this deletion is recommended as it is covered by EP3, and the guidance is aimed at existing householders considering paving their gardens and is not relevant to the amount of parking provided</del></p>		<p><i>that one parking space should be allocated per bedroom (i.e. at least one car parking space should be provided for one bedroom homes, at least two car parking spaces should be provided for two bedroom homes etc.). At least one secure bicycle parking space should be provided per bedroom;</i></p> <ul style="list-style-type: none"> <li><i>for other development, sufficient provision should be made for car and bicycle parking appropriate to the needs of the development;</i></li> </ul> <p><i>Delete “car park driveways should use permeable surfaces in accordance with government guidance” as this is covered by EP3 a)</i></p>
	<p>The Local Transport Plan states that A Roads are “the principal arteries along which goods and services are delivered” and most movements start/finish outside the Parish. Suggest that ‘B’ is deleted and rely on the last sentence of the policy which supports proposals to mitigate the impact of HGVs within the parish.</p>	<p><b>Policy T2 Traffic Calming</b></p>	<p><i>b) says developments must not lead to an increase. Last sentence says proposals which help minimise. Last sentence has been deleted.</i></p>

NAME	STATUTORY COMMENT	NHP Section	ACTION TAKEN
	<p>Suggest that 'F' should be a separate paragraph at the end of the Policy setting out the circumstances in which a transport statement or assessment and a travel plan would be required.</p> <p>Suggest 'h' be deleted as it is already covered by 'A'</p>		<p><i>'f' moved to the end</i></p> <p><i>'a' and 'h' combined.</i>  <i>(Note – new (b) added “take into account the pinchpoints on the A3052 (at Toll House, River Otter Bridge and Four Elms Hill)”</i></p>
	<p>'Housing Development' does not need to be capitalised.</p> <p>The creation of a Footpath and Cycling Strategy would be stronger as a separate objective (rather than a reference in this policy). There is no mention of it elsewhere in the plan so it would be useful to explain what the Plan wants to achieve as a separate objective. If it is made into an objective, this paragraph will be changed to:</p> <p><del>The future Parish 'Footpath and Cycling Strategy' will be supported, subject to consultation and agreement. This will include the</del> <b>The</b> provision of safe and continuous footpaths and cycleways and the reopening of the railway line between Newton <b>Poppleford</b> and Colaton Raleigh as a walking and cycling route <b>will be supported.</b></p>	<p><b>Policy T3</b>  <b>Rights of Way</b></p>	<p><i>Capitalisation removed.</i></p> <p><i>T3 policy wording reduced to “A future Parish 'Footpath and Cycling Strategy' will be supported, subject to consultation and agreement.”</i></p> <p><i>Added to T3 Policy Overview</i>  <i>“A Walking and Cycling Strategy would be supported to include:</i></p> <ul style="list-style-type: none"> <li><i>• new footpath alongside the River Otter bridge;</i></li> <li><i>• repairs to Red Bridge;</i></li> <li><i>• provision of safe and continuous footpaths and cycleways such as reopening of the railway line between Newton</i></li> </ul>

NAME	STATUTORY COMMENT	NHP Section	ACTION TAKEN
			<p><i>Poppleford and Otterton and beyond;</i></p> <ul style="list-style-type: none"> <li>• <i>full pedestrian access to be re-established from Northmostown Lane along Calm Lane, Houghton Lane, Halse's Lane and Hillway Lane to Mutters Moor;</i></li> <li>• <i>dog walking path behind the new development south of King Alfred Way; and</i></li> <li>• <i>new footpath in front of the Toll House"</i></li> </ul>
	<p>Suggested textual changes:</p> <p>ED AONB should be <b>East Devon</b> AONB; the <b>biodiversity</b>;</p> <p>a) give <del>highest priority</del> <b>great weight</b> to conservation and enhancement of the natural <del>amenity</del><b>environment</b>;</p> <p>c) <b>not include the</b> netting of trees and hedges <del>to facilitate development will not be permitted</del>;</p> <p>d) contribute towards the ecological network of the area with <b>appropriate measures to enhance bio-diversity</b> <del>measures, in particular, to support the biodiversity value of designated and local sites</del>;</p> <p>You have mapped the views, so refer to 'cherished public views <b>as</b></p>	<p><b>Policy EP1 Conservation and enhancement of the East Devon AONB and Natural Environment</b></p>	<p><i>Change made as requested</i></p> <p>a) <i>Change made as requested</i></p> <p>c) <i>Change made as requested</i></p> <p>d) <i>Change made as requested</i></p> <p><i>Delete reference to Map 9 from</i></p>

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	<p><b>identified on Map 9'</b></p> <p>'f) <del>not adversely impact on existing treeline</del>' is unclear. The dictionary definition of 'treeline' is 'the line north (or south) of which no trees grow' so it might be clearer to state '<b>not protrude above, or appear dominant when viewed against, existing lines or groups of trees</b>'.</p>		<p><i>EP1 Policy overview and insert it into EP1 Policy instead</i></p> <p><i>f) Change made as requested</i></p>
	<p>This Policy could be deleted as it is covered by EP4 (although uses permitted on floodzones aren't explicitly identified)</p>	<p><b>EP2 Development on designated Floodzones 2 and 3</b></p>	<p><i>Keep EP2 as it shows that the NHP does not support building on flood plains unless for flood alleviation or recreation.</i></p> <p><i>Keep EP4 in case other types of development are imposed despite no NHP support.</i></p>
	<p><b>Note- add to end of point D New drainage systems must demonstrate they will be effective in allowing for above surface water management on site and improvement of water quality. A management plan must be put in place for future maintenance of the drainage system. SuDS systems maintained by South West Water would be preferred.</b></p>	<p><b>EP3 Sustainable Drainage Systems (SuDS) and Minimising damage to existing properties</b></p>	<p><i>This wording is already in EP6 which applies specifically SUDs design and is pertinent to all relevant developments.</i></p> <p><i>EP3 is only relevant to minimising damage to existing properties.</i></p> <p><i>A reference to EP6 has been added to the end of EP3.</i></p>
	<p>A sequential approach will be taken <b>to the location of development.</b> when considering where new development will be located in an area</p>	<p><b>EP4 Policy EP4 -</b></p>	<p><i>Change made as requested</i></p>

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	subject to flooding.	<b>Flood Risk Assessment</b>	
	This Policy duplicates Local Plan policy EN22 and could be deleted.	<b>EP5 Surface Water Run-off</b>	<i>EP5 shows that it is supported by EN22 but we prefer to keep EP5 in the NHP as it goes into more local detail than EN22. e.g. the following EP5 wording is not in EN22 “should not cause any adverse impact to neighbouring properties or the surrounding environment/ wildlife habitat/water quality”.</i>
	This Policy should be combined with EP3. See suggested text at EP3 above.	<b>EP6 SuDS Design and Management</b>	<i>No change, see EP3 above</i>
	<p>Development proposals should demonstrate that they:</p> <p>i) <b>they</b> will have no adverse effect on the tranquillity, through increasing levels and frequency of noise, of the parish;:</p> <p>ii) <b>they have taken all reasonable steps to avoid or at least minimise will have no adverse effect, through</b> light pollution (during any part of the year), on our valued dark skies observable from the parish; <b>and</b></p> <p>iii) arrangements <b>are</b> <b>will be</b> put in place to control noise, air <b>and</b>, water <b>and</b> light pollution. <b>Note- iii could be deleted as pollution is covered by LP Policy EN14</b></p>	<b>EP7 Local Amenity</b>	<p><i>Make first two changes as requested.</i></p> <p><i>ii) would prefer not to change as developers and residents will have different interpretations of ‘reasonable’ and ‘minimise’.</i></p> <p><i>iii) ‘are’ replaced by ‘will be’.</i></p> <p><i>Other changes not made because - Although EP7 is</i></p>

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			<p><i>supported by EN14, EN14 does not say that 'arrangements will be put in place...'. Also, don't understand why noise and light are proposed for deletion as these are also an intrinsic part of EN14?</i></p>
	<p>Planning permission will be refused for development on high grade <b>best and most versatile</b> (categories 1, 2 and 3a) agricultural land (land in grades 1, 2 and 3a of the <b>Agricultural Land Classification</b>) unless it involves the development of land for the purposes of agriculture and forestry. <b>Note- the definition has been amended to reflect the NPPF definition. It does duplicate EN13.</b></p>	<p><b>EP8 Protecting agricultural land</b></p>	<p><i>Recognise that EP8 does duplicate EN13, but would prefer to also retain the wording in NHP as it is such an important issue for the parish (e.g. Alfred's Gate developers are believed to have downgraded agricultural land to get planning permission)</i></p>
	<p><b>Where existing buildings cannot be used or adapted,</b> Pproposals for development of new agricultural buildings,...</p> <p>ii) b) the provision of buildings related to support livestock principally to be kept outside; and;</p> <p><del>Existing buildings should be used or adapted in the first instance</del></p> <p>A Landscape <b>and visual impact assessment, proportionate to the scale of development,</b> Character Assessment will enable applicants <b>be required</b> to demonstrate that the siting and design of the new development is appropriate and that <b>any landscape and visual impacts are appropriately mitigated.</b> <del>it sits below the skyline and is</del></p>	<p><b>EP9 Development on Farmland for Agricultural Purposes</b></p>	<p><i>Change made as requested</i></p>

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	integrated into the landscape.		
	with one, two or three bedroom homes and with no more than three bedrooms. All dwellings should provide a high standard of amenity for the occupants. Note- the last sentence ensures that houses are not cramped/excessively small	<b>H1 Meeting Demand for Smaller Dwellings</b>	<i>Change made as requested</i>
	General Point- Does this achieve anything beyond Strategy 36? If there is a need for accessible developments, these could be encouraged at all scales, from 1 dwelling upwards	<b>H2 Housing which caters for those with mobility issues</b>	<p><i>No change</i></p> <p><i>The NHP wants ‘predominantly single storey dwellings on a flat site’ and ‘wheelchair access’ whereas Strategy 36 only requires the inclusion of single storey dwellings.</i></p> <p><i>Change 2<sup>nd</sup> paragraph to: Strategy 36 must be adhered to. There is a need for predominantly one bedroom particularly smaller homes that are capable of being adapted to suit an aging population, without these homes being ‘for the elderly’.</i></p> <p><i>Add to Appendix 7 Community Policy Justifications “Housing Needs survey 2016 confirms figures from Devon Homes Choice 2013 that there</i></p>



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			<p><i>is a need for one bedroomed dwellings in this parish and across East Devon.” This differs from Strategy 36 which says the expectation is for 2 bedrooms or more.</i></p> <p><i>Change last para to “Housing with level access and complying with Strategy 36 for which facilitates wheelchair access will be prioritised.</i></p>
	<ul style="list-style-type: none"> <li>• must be able to demonstrate that the development conserves and enhances the East Devon AONB and demonstrates an exceptional need for affordable housing which could not be accommodated outside the ED AONBs;</li> <li>• must provide a minimum of 66% affordable homes as per Strategy 35 of the East Devon Adopted Local Plan;</li> <li>• requires new housing to must meet the needs of the Parish community taking figures from Devon Home Choice or other choice-based lettings scheme. Note- Devon Home Choice might be replaced with another choice-based letting scheme in the near future so text should be future proofed.</li> </ul> <p>Subject to the other policies of this Plan, there is particular need within the Parish for:</p> <ul style="list-style-type: none"> <li>• affordable housing</li> <li>• one, two and three bedroom family homes Note- on page 27 of the Plan it states that there is particular need for 1 bed homes.</li> </ul>	<p><b>H3</b> <b>Housing Outside the Built-up area boundary</b></p>	<p><i>Make all changes as requested</i></p>

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	<ul style="list-style-type: none"> <li>single storey homes adapted for the elderly.</li> </ul> <p>Developments on exception sites will only be permitted where they meet demonstrable local <b>affordable</b> housing needs, that is, of appropriate type, tenure and scale according to an up to date housing needs survey minus any built since the survey was undertaken. The demonstration will be via a whole parish survey <del>commissioned by the Parish Council</del>. <b>Note- there is a standard methodology for this, the PC do not need to commit to funding it.</b></p>		
	<p>the effect of infill and garden developments and extensions should not be detrimental to the character of the <del>town</del> <b>village</b> and the <del>neighbourhood areas</del> ;</p> <p>- development should be sensitively designed to reflect the character of the <del>area</del> <b>site</b> and that of its neighbours, however where the surrounding area has been despoiled, qualities should be reinstated through good design, in line with strategy 48, which states that where an area has been despoiled it can be improved by good housing design;...</p> <p><b>- must comply with Policy H1- This is implicit, you don't really need to repeat it</b></p>	<p><b>TD1</b>  <b>Infill and garden developments and extensions within the Built-up area boundary</b></p>	<p><i>Make all changes as requested</i></p>
	<p>Such schemes must <del>meet</del> <b>comply with</b> other policies in this plan, <b>including those relating to flood risk, protection of the East Devon AONB and dwelling size.</b> (e.g. EP2 <del>not in flood zones 2 and 3, EP1 should not result in harm to the AONB and H1</del> each dwelling to be <del>no larger than 93sqm</del>).</p> <p><b>Note- There is a conundrum here because those in need of 'affordable' housing are unlikely to be able to self-build. The Policy would benefit from further explanation/definition in a supporting</b></p>	<p><b>TD2</b>  <b>Affordable homes to meet Local Need through a Community Land Trust</b></p>	<p><i>Make changes as requested</i></p> <p><i>It's understood that those in need of affordable housing are unlikely to be able to self-build but we want to future proof the NHP as future schemes may enable them to do so.</i></p>

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	<p>justification. If the CLT owns the land and grants a long leasehold interest to the self-builder, the leasehold status of the land combined with the local connection requirements may make it hard to obtain a mortgage.</p>		
	<p>Comment that it's a shame the most popular housing type in the Housing Consultation Survey is not locally distinctive but a style which can be found anywhere</p> <p>ii) new houses <del>w</del>should benefit from a satisfactory degree of privacy and daylight and all new developments <del>w</del>should be suitably positioned to ensure they do not have an adverse impact on the privacy and daylight of existing houses. (Guidance Note 2 – Distances Between Dwellings);</p> <p>iii) all new houses <del>w</del>should be given private garden space (e.g. for children's play, pets, drying clothes, quiet enjoyment, etc.). Front gardens do not constitute private garden space. (Guidance Note 3 – Private Garden Space);</p> <p>v) <del>they ensure</del> it is designed in such a way as to minimise its impact on the visual amenity of the surrounding landscape, on views of the proposed development especially viewed from footpaths within the AONB and on the natural environment and <del>mitigating</del> <del>es</del> any adverse impact using landscaping where necessary;</p> <p>viii) schemes for more than 5 dwellings <del>sh</del>ould include variation in design detail in order to maintain the variety of building that is</p>	<p><b>HQD1</b>  <b>Maintain the built character of our parish through High Quality Design</b></p>	<p><i>This section has been amended because Review of the Housing Styles Survey analysis shows little difference in popularity between styles 1 and 2.</i></p> <p><i>ii) Change made as requested</i></p> <p><i>iii) Change made as requested</i></p> <p><i>v) Change made as requested</i></p> <p><i>viii) Change made as requested</i></p>

NAME	STATUTORY COMMENT	NHP Section	ACTION TAKEN
	<p>characteristic of Newton Poppleford;</p> <p>ix) roofs <del>should be</del> <b>are</b> pitched and symmetrical unless there is an exceptional reason not to do so;</p> <p>xii) boundaries adjoining roads or public footpaths <del>should be</del> <b>are</b> defined in a traditional manner using stone or brick walls or native hedging, rather than close boarded fencing;</p> <p>xiii) street-lighting and furniture <del>should be</del> <b>is</b> limited and unobtrusive;</p> <p>xiv) the development <del>would</del> <b>does</b> not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination, land instability or cause ground water pollution;</p> <p>xvi) the development <del>would</del> <b>utilises</b> sustainable construction methods, <del>minimises the use of non-renewable resources and maximises the use of recycled and sustainably sourced materials where compatible with other policies in this document;</del></p> <p>xviii) they provide adequate, well designed off-road parking spaces with regard for the parking standards of the <del>Local</del> <b>Neighbourhood</b> Plan, except where this conflicts with <del>Conservation Area and/</del> neighbourhood design objectives. Modern design will be supported provided the local character is respected or enhanced; <b>Note- there is no Conservation Area in the Parish</b></p> <p>xix) principles of designing-out crime <del>have been</del> <b>should be</b> incorporated, such as suitable layout, <del>lighting</del> <b>window placement</b> and boundary treatments; <b>Note- there is potential for conflict between lighting to deter crime and protection of dark skies</b></p>		<p><i>ix) Change made as requested</i></p> <p><i>xii) Change made as requested</i></p> <p><i>xiii) Change made as requested</i></p> <p><i>xiv) Change made as requested</i></p> <p><i>xvi) Change made as requested</i></p> <p><i>xviii) Change made as requested for reason given.</i></p> <p><i>xix) Change made as requested for reason given.</i></p>

NAME	STATUTORY COMMENT	NHP Section	ACTION TAKEN
	<p>xxi) <del>ecological</del> <b>sustainable design</b> measures such as rain water capture and carbon reduction measures, (e.g. solar panels or water heating panels) <b>have been incorporated</b> <del>are encouraged but should be sited discretely;</del></p> <p>xxii) materials used <del>w</del> should be sympathetic to the localised area.;</p> <p><del>xxiii) d</del> <b>D</b>evelopment proposals that exceed current technical standards for sustainable construction will be encouraged.</p> <p>All major developments within the Neighbourhood Development Plan Area should be of a high standard of design as defined by BfL(12).</p>		<p><i>xxi) make changes as requested other than retain 'discretely' as these features can be unsightly</i></p> <p><i>xxii) Change made as requested</i></p> <p><i>xxiii) Change made as requested</i></p>
	<p>a) they do not create unacceptable disturbance to neighbouring residential properties by way of unsociable hours and should meet Policy EP75 – “Protect Tranquillity and Dark Skies” <b>Local Amenity</b>; <del>and</del></p> <p>b) the use of any floodlighting has mitigation measures in place to protect nearby residential property and areas of nature conservation; <b>and</b></p> <p>c) new sites <del>should be</del> <b>are</b> easily accessible by sustainable means, including by public transport, bicycle, horse, on foot, by wheelchair, etc.</p>	<p><b>CF2 Increasing Sports and Recreation Opportunities</b></p>	<p><i>a) Change made as requested</i></p> <p><i>c) Change made as requested</i></p>
	<p>Increased allotment provision, with improved access, would be <del>welcomed</del> <b>supported</b>.</p>	<p><b>GS1 Protection of Local Green</b></p>	<p><i>Change made as requested</i></p>

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	<p>e) should maximise opportunities for 'greening' the built environment through <b>planting of trees and shrubs appropriate to the local area and prevailing site conditions</b> <del>natural planting of shrubbery and trees local to the biodiversity of the surrounding area.</del></p> <p><b>To avoid confusion, it would be better to refer to 'the natural woodland in the field above Down Close' as Down Close is the name of the new housing</b></p>	<p><b>Spaces</b></p> <p><b>TH1</b></p> <p><b>Trees and hedgerows</b></p>	<p><i>Change made as requested</i></p> <p><i>All references to 'Down Close' woodlands changed as requested</i></p>
	<p>There is limited scope to create new business premises and the requirements may deter applications for conversion to B and C uses.</p> <p>The results of the community survey don't seem to support EM1. 65% and 57% of respondents supported COU to healthcare and shops, with only 12% and 9% for manufacturing and storage/distribution. It</p>	<p><b>EM1</b></p> <p><b>Conversion from residential use</b></p>	<p><i>EM1 Policy overview makes clear that this would be for small scale businesses which are unlikely to have "a significant adverse impact".</i></p> <p><i>Change wording "to <b>small business use</b>"</i></p> <p><i>Remove "b (light industrial)" which would be covered under EM2</i></p> <p><i>Add to EM1 Policy Justification</i></p> <p><i><b>"Small businesses are an appropriate way to provide employment in a rural parish, which also reduces the need to commute. "</b></i></p> <p>-----</p> <p><i>No change made.</i></p>

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	<p>isn't clear from the appendices where EM1 support for B1a (offices), b (light industrial) and c (Research and Development) was articulated.</p>		<p><i>Agreed that the community survey doesn't support this wording.</i></p> <p><i>Our original wording was supported by the Community Survey "Proposals which require a change of use from Residential will be supported, especially for healthcare or shop facilities. However, change of use for manufacturing and storage/distribution uses would not be supported"</i></p> <p><i>In July EDDC NHP officers suggested we replace it with this new wording to encourage new business:</i></p> <p><i>"The change of use of existing residential buildings, or part there-of, to business use: B1a (offices), b (light industrial) and c (Research and Development), will be supported, provided proposals ensure that they do not have a significant adverse impact on the character and appearance of the area and the amenity of neighbouring residents. "</i></p> <p><i>They gave the following reason which we agreed:</i></p>

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			<p><i>“Consider that some small scale manufacturing a distribution may be entirely appropriate / acceptable to the group. Think of a jewellery or craft item manufacturer who wishes to produce items and store stock + distribute from their home based workshop. Instead of the policy specifying uses that would not be supported, we’d suggest adopting the same or similar approach to Payhembury Policy PNP2.”</i></p> <p><i>Following added to Appendix 7</i>  <i>“Small businesses are already a significant employer within the Parish, with in excess of 60 small and home businesses in existence.”</i></p>
	<p>Criteria 5 increases costs and could conflict with the provision of the small industrial units the NP want to promote.</p> <p>Local employment is a laudable aspiration and it’s good it’s stated as an aim and not a strict policy requirement as local labour supply</p>	<p><b>EM2</b>  <b>Development of Small Business Enterprises</b></p>	<p><i>Make criteria 5 a separate statement rather than a bullet and reword to “Developments which use sustainable forms of construction, providing energy conservation measures and renewable energy will be encouraged.”</i></p> <p><i>NCR – supports the EM2 aim.</i></p>



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	simply may not exist.		
	Policy EM3 'provision' needs to state suitable ducting to accommodate FTTP broadband is a construction requirement of all new development.	<b>EM3 Superfast Connectivity</b>	<i>Change made as requested</i>
	This should refer to Non-designated Heritage Assets (rather than None designated)	<b>Appendix 2, point 3</b>	<i>Change made as requested</i>