

Farringdon Neighbourhood Plan

Summary of the Representations Submitted to the Independent Examination

Use of this Document

This document sets out a summary of the representations (comments) received on the Submission Version of the Neighbourhood Plan, which were passed to the independent examiner for consideration. Please note that the full responses are available on the [Farringdon Neighbourhood Plan](#) page of the District Council website:

- <https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/farringdon/>

The [Examiner's Final Report](#) is also available on this webpage and forms part of the documentation for the referendum. Correspondence that took place during the examination and documentation for every previous stage in the development of the neighbourhood plan is also available on the website.

The Submission Version of the Plan has been updated to the Referendum Version following consideration of the Examiner's final report by East Devon District Council. The District Council Decision Notice sets out the changes agreed between the versions. The Decision Notice and the Referendum Version of the Plan are also part of the referendum documentation and available on the website.

Summary of Representations

1. Avison Young for National Grid

An assessment was carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. Links and contacts provided for further information and guidance as required.

2. Broadclyst Parish Council

Congratulates Farringdon Parish Council on submitting the Plan. Comments that the Plan's policies reflect the needs and wishes of the community and looks forward to the policies determining the future of Farringdon Parish which it notes lies adjacent to several of East Devon's growth sites.

3. Devon Countryside Access Forum (DCAF)

Regarding **Policy Farr12 Walking & Cycling Networks**, DCAF supports the policy but advises that a small change to the wording would reflect the supporting text better. With reference to an extract of the supporting text, DCAF request the addition of the words 'and public rights of way' within the policy to read, "Development proposals to improve accessibility and extend local footpaths, bridleways and cycle-paths and strengthen links with the wider transport and public rights of way networks will be supported."

4. Devon County Council (DCC)

DCC is supportive of the Neighbourhood Plan for the area and its aims to provide the community's vision for the future. DCC does not object to the Plan but makes a small number of comments regarding highways and waste planning as follows:

- **Policy Farr5** - Given the opportunities for sustainable travel are limited in this area DCC suggest that a requirement for electric vehicle charging points at any new/ custom build be included;
- **Inset Map for Policy Farr6 (page 25)** – Further to comments at pre-submission stage and with reference to the Devon Waste Plan, DCC request an amendment to the purple line showing the ‘extent of employment site’ to include two units which have permitted and built, and for the boundary on this part of plan to align with that used in the Devon Waste Plan (Policy W6C);
- **Paragraph 9.11 (page 27)** – DCC note that Policy Farr6 seeks to prevent an outward expansion of business or commercial development and the identified boundary of the Hill Barton Business Park site is based on that shown in the East Devon Villages Plan. Noted also that this is in the context of business and commercial development specifically, and that the supporting text in paragraph 9.11 expands on this point. However, DCC request that the Neighbourhood Plan should acknowledge at paragraph 9.11 that the Devon Waste Plan allocation (Policy W6 & site W6C in that policy) extends beyond the purple line boundary on the inset map for Policy Farr 6 and therefore the principle of additional waste development in this location is established.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website.

5. East Devon District Council

This representation sought various amendments to policy wording as follows:

- **Policy Farr1 Safeguarding the Natural Environment** - Suggest removal of point (c) to “minimise impacts on biodiversity”, leaving the requirement to deliver a net gain in biodiversity (point d) as the clear policy position. Also to remove “whenever possible” from point (d) to be consistent with the current National Planning Policy Framework and the Government’s intention to make 10% biodiversity net gain mandatory on all development.
- **Policy Farr4 Extensions to dwellings** - Suggest removal of the requirement for extensions to ‘enhance’ existing dwellings as this is considered beyond what it would be reasonable to generally require. Instead to amend criteria (c) of the policy to replace the phrase “reflects and enhances” with “respects” “the character and appearance of the existing building”.
- **Policy Farr5 Self-build & Custom-Built Dwellings** – preference for the new dwellings to be (1) directed to the more sustainable locations in the parish – specifically within or near the village core, and (2) for these to be restricted in perpetuity for those with a local connection to ensure the identified need is met.

- **Policy Farr6 Existing Business & Commercial Areas** – noted this policy goes beyond Policy E7 of the Local Plan. However, this is not a strategic policy and it appears the Neighbourhood Plan policy is reflective of the submitted evidence of the views of the local community.
- **Policy Farr8 Tourism Development** – Amendments suggested for clarity that (i) this Policy does not apply to Crealy Park in line with the supporting text; (ii) that criteria ‘a’ relates to ‘any’ existing activity, and (iii) to include a definition of ‘tourism-related businesses’.
- **Policy Farr10 Existing Community Facilities** – suggest additional criteria to ensure (i) no visual harm and (ii) adequate parking provision.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website.

6. Forestry Commission

The Forestry Commission advise they do not unfortunately have the resources to respond to individual neighbourhood plans but make some key points relevant to all neighbourhood plans regarding (i) reviewing and improving existing trees and woodlands; (ii) protecting ancient woodland; (iii) Deforestation, and; (iv) Woodland creation. The response provides advice and guidance and links for further information.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website.

7. Highways England

Highways England have reviewed the Submission Version and remain satisfied that the plan’s proposed policies are unlikely to impact on the safe and efficient operation of our network and therefore have no specific comments to make.

8. Historic England

No issues associated with the Plan upon which Historic England wish to comment.

9. Marcia Frey

Generally supports the whole Neighbourhood Plan. In particular, strongly supports the restriction of further growth and development of Hill Barton Industrial Park and Waldron's Farm (Policy Farr6) and the desire to ensure a tranquil and safe village environment for both current and future residents. Raises concerns about the cumulative impact and effects on the community of planning permission granted by both Devon County Council and East Devon District Council at Hill Barton, and the monitoring of these.

The representation also raises some questions about the public rights of way in the Plan and the parish, suggesting that further information be sought to confirm public access.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website.

10. McMurdo on Behalf of Stuart Partners

Agent responding on behalf of Stuart Partners Ltd, a local company with diverse business interests, confirmed as owning a significant amount of land in the parish of Farringdon, including Hill Barton Business Park. The representation expresses concern that the Neighbourhood Plan is too restrictive of new development in the area and sets out that the area is suitable for strategic development, particularly in view of the restrictions that exist under national designations [i.e. Areas of Outstanding Natural Beauty etc.] across much of the rest of the district.

It specifically raises an objection to Policies Farr 2 (Retaining Rural Character) and Farr 6 (Existing Business & Commercial Areas) for the restrictions placed on the expansion of Hill Barton Business Park and development in the parish more generally. It states that Hill Barton Business Park is a strategically important business park in East Devon and the sub-region where growth "cannot be artificially curtailed". More generally, with reference to the discontinued Greater Exeter Strategic Plan and the 5-year review of the Local Plan (adopted in 2016), the representation "*respectfully, suggest that the Farringdon NP must be made to acknowledge that the parish is in an important location in the sub-region making up part of an area which is long recognised by the Council and its partners as the most sustainable option for accommodating future sub-regional strategic housing and employment needs, balancing environmental impacts with necessary social and economic gains.*" It also raises more general concerns about the way that this business park has been dealt with in planning policy terms at District-level, and sets out various reasons and evidence as to why expansion should be supported.

The representation also states that Stuart Partners Ltd have not been properly consulted on the Neighbourhood Plan.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website.

11. Natural England

No specific comments to make on this Plan.

12. Savills on Behalf of Crealy Theme Park & Resort and FWS Carter & Sons

The representation makes a number of general points including:

- References throughout should be to the current National Planning Policy Framework, dated 2019
- Concern expressed regarding the changing strategic context for the neighbourhood plan in terms of the now discontinued Greater Exeter Strategic Plan and the findings of the 5 year review of the adopted Local Plan. To accord with national policy, seeking that the neighbourhood plan be either paused to allow for account to be taken of the emerging new strategic policies, or edited to ensure it is not unduly seeking to influence or constrain them.
- Overall the representation suggests that the Submitted Neighbourhood Plan cannot progress to the independent examination stage without a number of edits to ensure conformity with the required basic conditions (particularly contribution to sustainable development) and national policy. Specifically, changes are sought to remove references to preventing development and also to accurately present and recognise the nature and character of the parish as not wholly rural.
- Welcomes the recognition within the Plan that Crealy has a strategic role and of the benefits of Greendale Farm Shop. However, concern expressed more generally about negative tone within the Plan in respect of local rural enterprise, and an objection raised to the amount of text related to this - without associated policy and of a nature considered beyond the scope of a neighbourhood plan.

The representation also comments on individual policies:

- **Policy Farr1 Safeguarding the Natural Environment** – (i) Amendment sought to reflect the National Planning Policy Framework in setting the threshold for harm as “significant”, not “unacceptable”; (ii) points out there is no test for ‘community benefit’ set out in paragraph 7.12 of the Neighbourhood Plan, and (iii) comments that bullet (a) of the policy regarding local habitat protection is non-compliant with national planning policy & guidance.

- **Policy Farr 2 Retaining Rural Character** – considers that the policy fails to reflect the diversity ('urban' and rural) of the parish and the Landscape Character Assessment, and does not meet the basic condition of 'contributing to sustainable development'. Furthermore, that the policy would significantly constrain the growth of these significant local businesses, and furthermore, would appear to be seeking a level of blanket protection against further development within the parish. Seeks amendments to the policy to ensure it is reflective of national policy and guidance, including that the assessment of any potential impacts of major development on local character would be assessed through the national requirement for a Landscape & Visual Assessment.
- **Policy Farr 3 Protecting Trees, Woodlands and Hedgerows** – seeks inclusion of a definition of what constitutes a large / medium / small tree for the purposes of clarity in the application of this policy.
- **Policy Farr 4 Extensions to Existing Dwellings & Policy Farr 5 Self-Build & Custom-Built Dwellings** – reports inaccuracies in the methodology employed in the supporting Housing Needs Assessment and comments that it does not reference the most up to date Strategic Housing Market Assessment available at the time of publication.
- **Policy Farr 6 Existing Business & Commercial Areas** – considers that this policy fails to accord with national planning policy and the need to support sustainable growth, and comments that the policy goes beyond the scope of a neighbourhood plan regarding delivery of new strategic employment.
- **Policy Farr 7** – supports the recognition of Crealy as a major/strategic tourism business and a matter for the strategic policies of the Local Plan, but seeks an amendment in the wording to make it clearer that the policy does not apply to Crealy. Also seeking removal of text at paragraph 9.1 and 9.17-9.18 as not relevant to the policy and outside scope of a neighbourhood plan.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website

13. South West Water

The content of the Plan is noted by South West Water. No other comments.

14. Sport England

The representation provides general guidance and sources of further information for the neighbourhood plan about national planning policy and Sport England's role and policy with regards to sports and recreation. No specific comments on the detail of this plan.

See the [full representation](#) on the neighbourhood planning pages of the East Devon District Council website.